

DEPARTMENT OF CITY PLANNING APPEAL REPORT

City Planning Commission

Date: August 9, 2018

Time: After 8:30 a.m.*

Place: Los Angeles City Hall

Council Chamber, Room 340 200 North Spring Street Los Angeles, CA 90012

Public Hearing: Required

Appeal Status: Appealable to City

Council

Expiration Date: August 9, 2018

Case No.: VTT-74172-1A

CEQA No.: ENV-2015-1923-EIR

SCH No. 2006111135

Previous Cases: CPC-2007-515-GPA-ZC-HD-CU-

CUB-ZV-ZAA-SPR-SPE-SPP-1A

and VTT-68501-2A

Related Case: CPC-2015-1922-GPA-VZC-

HD-CUB-DB-SPR

Council No.: 13 – O'Farrell **Plan Area:** Hollywood

Specific Plan: Hollywood Signage Supplemental

Use District (SUD)

Certified NC: Hollywood Studio District

Existing GPLU: Regional Center Commercial and

High Medium Residential

Proposed GPLU: Regional Center Commercial **Existing Zone:** (T)(Q)C2-2D and (T)(Q)R4-1VL

Proposed Zone: C2-2D

Applicant: Shaul Kuba; 5929 Sunset

(Hollywood), LLC

Applicant

Representative: Katherine Casey; Craig Lawson

& Co., LLC

Appellant:

Appellant

Representative: Mitchell M. Tsai; Mitchell M. Tsai,

Attorney at Law

Coalition to Preserve LA

PROJECT LOCATION:

5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street

PROPOSED PROJECT:

Vesting Tentative Tract Map for the merger and re-subdivision of nine (9) lots into one (1) master lot and one (1) airspace lot (above and below grade), and limited dedication and merger of Gordon Street below grade at a width of four (4) feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk, in conjunction with a 22-story residential development consisting of an 18-floor residential tower above a four-level above-grade podium structure including three levels of subterranean parking and three levels of above-grade parking and containing a maximum of 299 apartment units, 46,110 square feet of commercial space, and an 18,962-square-foot public park.

REQUEST:

An appeal of the entire decision of the Advisory Agency in approving the following actions:

 The Advisory Agency has reviewed and considered the information contained in the Supplemental Environmental Impact Report (EIR) prepared for this project, which includes the Draft Supplemental EIR, No. ENV-2015-1923-EIR (State Clearinghouse No. 2006111135), dated August 24, 2017, and the Final Supplemental EIR, May 25, 2018 (Sunset and Gordon Mixed-Use Project Supplemental EIR), as well as the whole of the administrative record.

Certified the following:

- a. The Sunset and Gordon Mixed-Use Project Supplemental EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- b. The Sunset and Gordon Mixed-Use Project Supplemental EIR was presented to the Advisory Agency as a decision-making body of the lead agency; and
- c. The Sunset and Gordon Mixed-Use Project Supplemental EIR reflects the independent judgment and analysis of the lead agency.

Adopted the following:

- a. The related and prepared Sunset and Gordon Mixed-Use Project Supplemental EIR Environmental Findings;
- b. The Statement of Overriding Considerations; and
- c. The Mitigation Monitoring Program prepared for the Sunset and Gordon Mixed-Use Project Supplemental EIR.
- 2. Pursuant to Section 17.03 of the Los Angeles Municipal Code (LAMC), the Advisory Agency approved Vesting Tentative Tract Map No. 74172 composed of one (1) master lot and one (1) airspace lot (above and below grade), and for the limited dedication and merger of Gordon Street below-grade at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk, located at 5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street for a 22-story residential development consisting of an 18-floor residential tower above a four-level above-grade podium structure including three levels of subterranean parking and three levels of above-grade parking, and containing a maximum of 299 apartment units, 46,110 square feet of commercial space, and an 18,962-square-foot public park, as shown on revised map stampdated June 20, 2018, in the Hollywood Community Plan.

RECOMMENDATION:

- 1. **Deny** the appeal.
- 2. **Find**, based on the independent judgment of the City Planning Commission, after consideration of the whole of the administrative record, that the project was previously assessed in the Sunset and Gordon Mixed-Use Project EIR, SCH No. 2006111135, certified by the Community

Redevelopment Agency (CRA) on October 18, 2007, the Erratum to the EIR, dated October 10, 2007 and Addendum to the EIR, dated February 29, 2008, pursuant to CEQA Guidelines, Sections 15162 and 15164; and

3. **Find**, that the City Planning Commission, has reviewed and considered the information contained in the Sunset and Gordon Mixed-Use Project EIR, SCH No. 2006111135, certified by the CRA on October 18, 2007, the Erratum to the EIR, dated October 10, 2007, and Addendum to the EIR, dated February 29, 2008; and the Supplemental EIR, which includes the Draft Supplemental EIR, No. ENV-2015-1923-EIR, SCH No. 2006111135, dated August 24, 2017, and the Final Supplemental EIR dated May 25, 2018 (collectively, the Sunset and Gordon Mixed-Use Project Supplemental EIR), as well as the whole of the administrative record.

Certify that:

- a. The Sunset and Gordon Mixed-Use Project Supplemental EIR has been completed in compliance with CEQA;
- b. The Sunset and Gordon Mixed-Use Project Supplemental EIR was presented to the City Planning Commission as a decision-making body of the lead agency; and
- c. The Sunset and Gordon Mixed-Use Project Supplemental EIR reflects the independent judgment and analysis of the lead agency.

Adopt the following:

VINCENT P. BERTONI, AICP

- The related and prepared Sunset and Gordon Mixed-Use Project Supplemental EIR Environmental Findings;
- b. The Statement of Overriding Considerations: and
- c. The Mitigation Monitoring Program prepared for the Sunset and Gordon Mixed-Use Project Supplemental EIR.
- 4. Sustain the Advisory Agency's determination to approve Vesting Tentative Tract Map No. 74172.
- 5. Adopt the Advisory Agency's Conditions of Approval and Findings.

Advisory Agency	
Ammuno	Ammuo A
Shana Bonstin, Principal City Planner	Christina Toy Lee, Senior City Planner
a la	MuiClus
Mindy Nguyen, City Planner	Nuri Cho, City Planning Associate

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Central Los Angeles Area Planning Commission Secretariat, 200 North Spring Street, Room 532, Los Angeles, CA 90012* (Phone No.213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than seven (7) working days prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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Supplemental Environmental Impact Report (EIR) link: https://planning.lacity.org/eir/SunsetAndGordon/SunsetGordonCoverPg.html	
CRA Certified Final EIR Link: http://clkrep.lacity.org/onlinedocs/2008/08-1509_misc_9-1-07.pdf	

Erratum to the CRA Certified Final EIR Link: http://clkrep.lacity.org/onlinedocs/2008/08-1509_misc_10-7-07.pdf

Addendum to the CRA Certified Final EIR Link:

http://clkrep.lacity.org/onlinedocs/2008/08-1509_misc_2-29-08.pdf

APPEAL REPORT

BACKGROUND

Location and Setting

The project site consists of nine (9) contiguous rectangular-shaped lots totaling approximately 72,154 square feet. The site has frontages of approximately 221 feet on the northern side of Sunset Boulevard and approximately 417 feet on the eastern side of Gordon Street.

All properties fronting on Sunset Boulevard and two (2) parcels fronting on Gordon Street (Lots 6 and 12-16) are designated for Regional Center Commercial land uses and zoned (T)(Q)C2-2D-SN, and the remaining parcels fronting on Gordon Street (Lots 17-19) are designated for High Medium Residential land uses and zoned (T)(Q)R4-1VL. The project site is located in the Hollywood Community Plan area, Hollywood Redevelopment Project Area, Los Angeles State Enterprise Zone, Urban Agriculture Incentive Zone, and Fire District No. 1. Lots 6 and 12-16 are located in the Hollywood Signage Supplemental Use District (SUD) (Exhibit B).

Properties to the north are designated for High Medium Residential land uses, zoned [Q]R4-1VL, and improved with a four-story apartment complex. Properties to the west are designated for Highway Oriented Commercial and High Medium Residential land uses, zoned C4-1-SN and [Q]R4-1VL, and improved with single-story retail and commercial uses, a surface parking lot, and residential use. Properties to the south are designated for Regional Center Commercial and Limited Manufacturing land uses, zoned (T)[Q]C4-2D and [Q]C4-1, and improved with single-story commercial uses and the 10-story Emerson College Los Angeles Campus building. Properties to the east are designated for Regional Center Commercial and High Medium Residential land uses, zoned (T)(Q)C4-2D-SN, (T)(Q)C4-2D, and [Q]R4-1VL, and developed with low- to mid-density residential uses and a surface parking lot (Exhibit B).

<u>Sunset Boulevard</u> is an Avenue I per the Mobility Plan 2035 with a designated full right-of-way width of 100 feet and roadway width of 70 feet. The street is currently improved to the required standards with a 100-foot full right-of-way, 50-foot half right-of-way, and 15-foot sidewalks.

Gordon Street is a Local Limited Street per the Mobility Plan 2035 with a designated full right-of-way width of 50 feet and roadway width of 30 feet. The street is currently improved to the required standards with a 52 to 53-foot full right-of-way, 26 to 27-foot half right-of-way, and 8 to 9-foot sidewalks.

Existing Development

In October 2007, the Community Redevelopment Agency (CRA) certified the EIR (Certified EIR) for the demolition of then-existing buildings on the project site and the development of a 23-story mixed-use project containing 311 multi-family residences, approximately 53,500 square feet of commercial space, a 21,177-square-foot public park, 508 parking spaces, and two (2) supergraphic signs.

In September 2008, the City of Los Angeles approved land use entitlements for the project under Case Nos. CPC-2007-0515-GPA-ZC-HD-CU- CUB-ZV-ZAA-SPR-SPE-SPP and VTT-68501.

Between January and July 2012, the Los Angeles Department of Building and Safety (LADBS) issued demolition and building permits for construction of the 23-story mixed-use project.

However, in March 2015, LADBS issued an Order to Vacate as a result of a Court order voiding any permits issued for the project.

The project site is currently built out with the project analyzed in the Certified EIR – a vacant, 22-story, approximately 250-foot tall, mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962 square-foot public park. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking. A complete and detailed project history can be found in the Staff Recommendation Report for Related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR.

The applicant seeks to re-entitle the completed building and public park so that all necessary permits can be considered for issuance by the City.

Proposed Project

The applicant, 5929 Sunset (Hollywood), LLC, proposes to modify the previous project and allow for development of a mixed-use project containing 299 residential apartment units, including 269 market rate units and 15 affordable housing units at the Very Low Income level (5 percent of total units), and 15 units for workforce housing (5 percent of total units); approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor retail space including up to a 1,475-square-foot coffee shop; and an approximately 18,962 square-foot public park. In total, the project will contain approximately 324,693 square feet of floor area. The project will be a 22-story structure consisting of an 18-floor residential tower with a four-level above-grade podium stricture including three levels of above-grade and three levels of below-grade parking.

As proposed, the project also includes a new automated steel parking structure located above the parking area on Level L3 (within the approximate height of Level L4 of the podium structure, occupied by creative office space), which would include two floors of automated parking, and provide 353 residential parking spaces and 75 commercial parking spaces (for a total of 428 parking spaces).

Case No. VTT-74172 and Appeal

On June 29, 2018, the Advisory Agency approved Vesting Tentative Tract Map No. 74172 for the merger and re-subdivision of nine (9) lots into one (1) master lot and one (1) airspace lot (above and below grade), and limited dedication and merger of Gordon Street below grade at a width of four (4) feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk, as shown on the revised map stamp-dated June 20, 2018. As part of the Vesting Tentative Tract Map approval, the Advisory Agency also certified and adopted the Sunset and Gordon Mixed-Use Project Supplemental EIR, Statement of Overriding Considerations, and Mitigation Monitoring Program. The Advisory Agency approved the "No Automated Steel Parking Structure Alternative" as part of the certification and adoption of the Sunset and Gordon Mixed-Use Project Supplemental EIR and the approval of Vesting Tentative Tract Map No. 74172 (Exhibits C and D). This Alternative involves the approval of an Ordinance that would allow for the reduction of clear space at structural elements¹ in the project's parking structure and up to 66

¹ LAMC Section 12.21 A.5(a)(ii) requires the minimum width of every parking stall provided for multi-family dwelling units to be increased by at least 10 inches when the stall adjoins a wall, partition, column, post or other obstruction that is located less than 14 feet from the access aisle in order to provide adequate "clear space" for residents' cars to park and for people to be able to enter and exit safely from their vehicles.

percent of the parking stalls to be compact parking stalls. The Ordinance under this Alternative will be processed under Related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. This Alternative would not involve the construction of a new automated steel parking structure. The Supplemental EIR identified the "No Automated Steel Parking Structure Alternative" as the Environmentally Superior Alternative to the proposed project, as this Alternative would include less exterior construction activities and slightly reduce the intensity of the significant and unavoidable noise impact as compared to the proposed project with the automated steel parking structure. On July 6, 2018, the Department of City Planning received an appeal of the entire decision by the Advisory Agency.

Related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR

The approved map is related to Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR for a 22story residential development consisting of an 18-floor residential tower above a four-level abovegrade podium structure including three levels of subterranean parking and three levels of abovegrade parking, and containing a maximum of 299 apartment units, 46,110 square feet of commercial space, and an 18,962-square-foot public park. The applicant is seeking a General Plan Amendment to amend the 1988 Hollywood Community Plan to re-designate the portion of the project site located at 1528-1540 N. Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. 2), from High Medium Residential to Regional Center Commercial; a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and building height of approximately 250 feet (22 stories); a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant; an Affordable Housing On-Menu Incentive to allow a 20 percent decrease in the total required amount of usable open space for a project setting aside 15 units, or 5 percent of the total number of dwelling units, for Very Low Income Households, and 15 units, or 5 percent of the total number of dwelling units, for workforce housing, in conjunction with Parking Option 1; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. This case will be heard by the City Planning Commission concurrently to the subject appeal.

THE APPEAL/STAFF RESPONSES

The following is a summary of the appeal and staff's response. It should be noted many of the appellant's claims are the same comments submitted to the Department of City Planning on the Draft Supplemental EIR on October 9, 2017 and to the Deputy Advisory Agency during the public hearing held on June 20, 2018. The appellant's comments have been addressed in detail under Section III. Responses to Comments in the Final Supplemental EIR. A link to the Draft and Final Supplemental EIR is provided in Table of Contents on page 4 of this report.

Appeal Point 1:

The Supplemental EIR fails to adequately disclose the project's impact on local neighborhood streets. The Supplemental EIR underestimates traffic impacts, excluding the traffic generated by the residential portion of the project from its analysis of impacts on neighborhood residential streets. The City's Transportation Impact Study Guidelines, local CEQA significance thresholds and the CEQA Guidelines do not exclude residential traffic from analysis of residential street impacts.

Staff Response: Per Section 2.3 Residential Street Impact Analysis of Los Angeles

Department of Transportation (LADOT) Transportation Impact Study

Guidelines, commercial development projects may be required to conduct a Residential Street Impact Analysis. The objective of this Analysis is to determine potential increases in average daily traffic associated with cutthrough traffic that can result from a project and impact residential streets. Cut-through trips are measured as vehicles that bypass a congested arterial street or intersection to instead travel along a residential street. Per the LADOT Transportation Impact Study Guidelines, when selecting residential street segments for analysis, all of the following conditions must be present:

- The proposed project is a non-residential development and not a school;
- The arterial is sufficiently congested, such that motorists traveling on the
 arterial may opt to divert to a parallel route through a residential street;
 the congestion level of the arterial can be determined based on the
 estimated level of service (LOS) under project conditions of the study
 intersection(s); LOS E and F are considered to represent congested
 conditions;
- The project is projected to add a significant amount of traffic to the congested arterial that can potentially shift to an alternative route; project traffic would need to exceed the daily minimum significance thresholds listed under "Project-Related Increase in Average Daily Traffic"; and
- The local residential street(s) provides motorists with a viable alternative route.

The proposed project is a mixed-use development containing both residential and commercial components. A Traffic Impact Analysis, dated October 2016, was prepared by Overland Traffic Consultants, Inc. for the proposed project. LADOT reviewed the Traffic Impact Analysis and concurred with the analysis and conclusion. Both Traffic Impact Analysis and LADOT approval letter, dated December 27, 2016, are included as Appendix G to the Draft Supplemental EIR.

In the Traffic Impact Analysis, LADOT required the project to evaluate potential cut-through traffic on residential streets of its commercial component only, which is consistent with LADOT's Transportation Impact Study Guidelines. In addition, LADOT confirmed on March 21, 2018 via email (Exhibit E) that the residential component of the traffic for the proposed project was not considered in the impact analysis, because the specific intent of this analysis is to identify cut-through traffic that is primarily defined as commercial traffic that uses the local neighborhood street network to bypass congested arterials. Per LADOT, local streets are designed to support residential traffic. and not commercial traffic, so LADOT does not measure residential traffic on local streets but requires commercial cut-through traffic to be analyzed. Residential traffic that uses the local street network merely as direct access to the project property is not considered cut-through traffic and is therefore not applicable to the residential street impact analysis. LADOT further confirmed that the traffic study prepared for the proposed project was completed correctly.

Furthermore, State CEQA Statutes and Guidelines Appendix G focuses on the analysis of the performance of the entire circulation system based on

applicable plans and policies, not whether there is an increase in vehicle trips, as follows:

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Appendix G was amended in March 2010 in response to Senate Bill 97, which directed the Natural Resources Agency to develop certain amendments to the State CEQA Statutes and Guidelines. The traffic and transportation language in Appendix G was amended to focus on a project's effect on the overall circulation system instead of an increase in traffic trips. In amending Appendix G, the Natural Resources Agency recognized a lead agency's discretion to choose a methodology to assess traffic impacts on the circulation system. As such, the City's decision to focus on the commercial trips for the residential street segment analysis, in conformance with LADOT's Transportation Impact Study Guidelines and Traffic Study Policies and Procedures, to evaluate a project's impacts to the circulation system in its entirety, is consistent with State CEQA Statutes and Guidelines Appendix G. Therefore, the Residential Street Impact Analysis was conducted in compliance with applicable LADOT policies and CEQA, and the proposed project would not have a significant impact on local residential streets. The Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 2:

The Supplemental EIR fails to disclose significant traffic impacts at the intersection of Vine and Sunset. The Supplemental EIR understates the project's transportation impacts by understating the amount of traffic that could take an alternative route to the project via Vine or Argyle Street, so much so that the addition of just one (1) more project trip making the southbound left turn at the intersection would make the project have a significant impact even with the proposed TDM Plan.

Staff Response:

A Traffic Impact Analysis, dated October 2016, was prepared by Overland Traffic Consultants, Inc. and included as Appendix G to the Draft Supplemental EIR, and a Supplemental Traffic Analysis, dated March 2018, was prepared by Overland Traffic Consultants, Inc. and included as Appendix C to the Final Supplemental EIR. The Supplemental Traffic Analysis explains that the Traffic Impact Analysis did not distribute trips north of Sunset Boulevard on Vine Street or Argyle Avenue, because drivers are not reasonably likely to use Vine Street or Argyle Avenue for access to or from the Hollywood Freeway since there are alternative entrances and exits to the Freeway that are substantially closer to the project site. The alternative entrances and exits to the Freeway include the southbound route via Van Ness Avenue and Sunset Boulevard approximately 1,600 feet from the project

site, southbound route via Hollywood Boulevard and Bronson Avenue approximately 2,300 feet from the project site, and southbound route via Gower Street and Yucca Street approximately 3,000 feet from the project site. As there are three closer southbound Hollywood Freeway off-ramps that can be used to access the project site than the southbound Vine Street off-ramp, which is over 4,700 feet away from the project site, it is not reasonable to assume that drivers would use the Vine Street off-ramp to access the project site.

Another reason drivers are unlikely to exit the freeway at Vine Street is because they would be required to travel the additional distance to the project site on slower moving streets. As explained in the Supplemental Traffic Analysis, there are high volumes of traffic on streets in the Hollywood area during peak hour periods, which makes it unlikely that drivers on the southbound Hollywood Freeway would exit the Freeway four exits away from the project site to traverse the added distance on slow-moving streets through a more congested area to access the project site, when there are closer and potentially faster alternative routes. Accordingly, the Traffic Impact Analysis concluded that drivers would not exit the Hollywood Freeway at Vine Street during peak hours and use Vine Street or Argyle Street to access the project site.

Nevertheless, the Supplemental Traffic Analysis was prepared for the Final Supplemental EIR to provide a more conservative analysis and additional information, and to respond to comments received regarding the intersection analysis and trip distribution. The Supplemental Traffic Analysis concluded that the with the additional distribution analysis, the intersection of Vine Street and Sunset Boulevard has the potential to be significantly impacted during the P.M. Peak Hour. However, potential impacts at the intersection of Vine Street and Sunset Boulevard would be reduced to less-than-significant levels with the implementation of a Transportation Demand Management (TDM) Plan, which has been included in the Final Supplemental EIR as Mitigation Measure MM K.1-3 that states:

MM K.1-3: The proposed project shall implement a Transportation Demand Management (TDM) Plan, consistent with the recommendations of LADOT, that would achieve at least a 10 percent reduction in the proposed project's P.M. Peak Hour trips. While multiple methods of compliance may be available for certain measures, the final TDM Plan shall be reviewed and approved by LADOT prior to the certificate of occupancy for the proposed project to ensure that the TDM Plan will provide at minimum a 10 percent reduction in the proposed project's P.M. Peak Hour trips. Potential measures that could achieve a 10 percent reduction in the proposed project's P.M. Peak Hour trips include the following elements:

- 1. Establish an on-site Transportation Management Office (TMO) as part of the management office to assist residents and employees in finding alternate travel modes and strategies.
- 2. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;

- 3. Provide car sharing service for residents and employees:
- 4. Encourage alternative work arrangements for residents and employees;
- 5. Improve the existing bus stop on the north side of Sunset Boulevard, east of Gordon Street:
- 6. Provide transit pass reductions of at least 25% for residents and employees;
- 7. Provide carpool and vanpool matching and preferential parking for carpools/vanpools that register with the TMO;
- 8. Provide secure bicycle facilities and bicycle sharing service for residents and employees;
- 9. Provide transit and ridesharing incentives such as points or coupons for merchandise
- 10. Provide guaranteed rides home for employees that use alternative modes of transportation or rideshare in the event of an emergency;
- 11. Provide unbundled parking for residents; and
- 12. Encourage office tenants to establish workplace parking for employees (i.e. charging employees of office tenants for some or all of their parking costs) or to establish an employee parking cash-out program.

The TDM Plan incorporates enhanced measures to achieve a reduction in the proposed project's vehicle trips by 10 percent during the P.M. Peak Hour. The Supplemental Traffic Analysis includes an evaluation of the TDM Plan prepared by Fehr & Peers. The effectiveness of the TDM Plan was estimated using Fehr & Peers' TDM+ tool, which estimates a percent reduction in vehicles miles traveled (VMT) due to a variety of individual TDM strategies. The VMT reductions estimated in the TDM+ tool are based on strategies. methodologies, and research identified in Quantifying Greenhouse Gas Mitigation Measures by the California Air Pollution Control Officers Association. This TDM Plan was reviewed and approved by LADOT on April 26, 2018, and LADOT's Approval Letter is included as Appendix D to the Final Supplemental EIR. LADOT's approval letter of the Supplemental Traffic Analysis, dated July 31, 2018, is also included in Exhibit F of this report. The TDM Plan will be implemented through Mitigation Measure MM K.1-3 in the Supplemental EIR and Condition of Approval No. 25 in the Advisory Agency's Letter of Determination (Exhibit C). Furthermore, the appellant has not submitted any citation, analysis, or document supporting his claim that the TDM Plan will not reduce potential significant impacts to less-than-significant levels. Therefore, the Supplemental EIR did disclose the proposed project's potential impacts at the intersection of Vine Street and Sunset Boulevard and identified a mitigation measure that would reduce potentially significant impacts to less-than-significant levels, and the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 3:

The Supplemental EIR fails to disclose significant traffic impacts on Gordon Street from vehicles queuing to enter the project on Gordon Street, as it underestimates the length of vehicle queues likely to form from vehicles attempting to enter the project.

Staff Response:

Vehicular access for the proposed project would be from a single driveway off of Gordon Street, north of Sunset Boulevard. The driveway will be located at the north end of the building site, south of the public park site. The Supplemental Traffic Analysis, dated March 2018, prepared by Overland Traffic Consultants, Inc. and included as Appendix C to the Final Supplemental EIR, includes a queuing analysis for the proposed project under conservative estimates. Prior to any access gates, the proposed project will provide approximately 58 feet of shared drive aisle queuing space, plus an additional approximately 38 feet for queuing space for residential vehicles, and an additional approximately 119 feet, 4 inches of queuing space for commercial vehicles. As such, the proposed project's queuing area would exceed the LADOT standard that requires a minimum of 60 feet prior to access gates for queuing area.

Furthermore, the combined queue for the residential and commercial uses is seven (7) vehicles during the A.M. Peak Hour and six (6) vehicles during the P.M. Peak Hour. The Supplemental Traffic Analysis estimates that the proposed project has sufficient queuing space in the garage for a total of 11 vehicles to queue on site prior to entry through access gates. As such, there is sufficient space on-site for the combined total queue at any given time in the proposed project's parking garage prior to entry through the access gates. As such, based on the results of the conservative queuing analysis provided in the Supplemental Traffic Analysis, the proposed project's parking garage has ample capacity for vehicles that would gueue as part of the proposed project. No queues would extend beyond the proposed project's parking structure to affect traffic on Gordon Street, and therefore, no queuing impacts would occur. Furthermore, as required by LADOT's Approval Letter, included as Appendix G to the Draft Supplemental EIR, the proposed project is required to submit proposed driveway dimensions, access and circulation schemes to LADOT for their review and approval.

The appellant contends that there is no space for vehicles that accidentally enters the garage to make a U-turn. Garages are designed for parking areas, not for U-turn space for vehicles that accidentally enter the garage, and internal conflicts within a parking garage are typical as vehicles enter and exit parking spaces. Regardless, a car accidentally entering the parking garage would not result in a potentially significant impact on vehicles traveling on Gordon Street.

The appellant also questions how guests will enter the residential gated area since it would take longer for non-residents to open the gate and affect delays on Gordon Street. Residents and guests will have access to the gate with a tenant's entry card or fob sensor. The amount of time guests will take to enter the residential parking area is anticipated to be similar to residents, because they would have the tenant's entry card or fob sensor. The access time was estimated at a conservative 13 seconds per the queuing analysis. Other guests of the project site may choose to park in the commercial parking area, in which case, they would access the parking area with a ticket. The access time to enter the commercial parking area was estimated at a conservative 40 seconds by the queuing analysis. Accordingly, the queuing analysis accounted for conservative service rates, and quest queuing would not take

longer than estimated. As such, the Supplemental EIR determined that no queuing impacts would occur even with conservative estimates. Therefore, the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 4:

The Supplemental EIR should be recirculated due to significant new information unveiled in the Final Supplemental EIR. The Final Supplemental EIR adopted new transportation mitigation measures, including a new transportation demand management plan to mitigate previously undisclosed transportation impacts not disclosed in the Draft Supplemental EIR. The City is required to recirculate the Draft Supplemental EIR with the revised traffic analysis and mitigation measures and for a new round of public comment prior to certification.

Staff Response:

The proposed project's trip distribution and study intersections were initially evaluated in Section IV.K.1, Traffic/Transportation of the Draft Supplemental EIR based on a Traffic Impact Analysis, dated October 2016, prepared by Overland Traffic Consultants, Inc., The Traffic Impact Analysis as well as LADOT's Approval Letter of the Analysis were included as Appendix G to the Draft Supplemental EIR. The Traffic Impact Analysis included detailed analysis of 20 intersections based on LADOT's traffic impact criteria and in consultation with LADOT. While the Traffic Impact Analysis concluded that the proposed project would have potentially significant impacts on two study intersections: Bronson Avenue and Sunset Boulevard, and Gower Street and Sunset Boulevard, the Traffic Impact Analysis did not identify potentially significant impacts on the Vine Street and Sunset Boulevard intersection. For the two intersections that may be impacted by the proposed project, the applicant is required to implement Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements at Bronson Avenue and Sunset Boulevard and Gower Street and Sunset Boulevard.

In response to the Draft Supplemental EIR, AIDS Healthcare Foundation submitted comments regarding potential impacts on the Vine Street and Sunset Boulevard intersection. While the proposed project's Traffic Impact Analysis was prepared based on expert analysis of conditions in Hollywood and reasonable expectations of driver behavior based on those conditions, and in consultation with LADOT and in compliance with CEQA, a Supplemental Traffic Analysis, dated March 2018, was prepared by Overland Traffic Consultants, Inc. to provide a more conservative analysis and additional information, and to respond to comments from AIDS Healthcare Foundation regarding the intersection analysis and trip distribution. The Supplemental Traffic Analysis is included as Appendix C to the Final Supplemental EIR.

Consistent with the Traffic Impact Analysis dated October 2016 and the Draft Supplemental EIR, the Supplemental Traffic Analysis concluded that the same two (2) intersections at Bronson Avenue and Sunset Boulevard and Gower Street and Sunset Boulevard would be significantly impacted by proposed project traffic prior to mitigation, and that the implementation of Mitigation Measures MM IV.K.1-1 and MM I.V.K.1-2 would reduce potentially significant impacts to less-than-significant levels. The Supplemental Traffic

> Analysis also found that with the additional distribution analysis, the intersection of Vine Street and Sunset Boulevard has the potential to be significantly impacted during the P.M. Peak Hour. However, potential impacts at the intersection of Vine Street and Sunset Boulevard would be reduced to less-than-significant levels with the implementation of a Transportation Demand Management (TDM) Plan. The TDM Plan has been included in the Final Supplemental EIR as Mitigation Measure MM K.1-3 as previously described.

> Pursuant to State CEQA Statutes and Guidelines Section 15088.5, "significant new information" requiring recirculation includes:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The Final Supplemental EIR did not identify any new significant environmental impact that would result from implementation of Mitigation Measure MM K.1-3; did not result in a substantial increase in the severity of an environmental impact that would result from the proposed project that cannot be mitigated to a level of insignificance; did not include an alternative or mitigation measure that would lessen impacts but was declined to be adopted by the project's proponents; and was not inadequate and conclusory such that meaningful public review and comment were precluded. The analysis conducted in the Supplemental Traffic Analysis did not change any of the conclusions in the proposed project's Traffic Study and the Draft Supplemental EIR and the proposed project's traffic and circulation impact would remain less than significant with the implementation of mitigation. As such, identifying an impact that would be reduced to less-than-significant levels with a mitigation measure is not considered new significant information warranting recirculation. Therefore, recirculation of the Supplemental EIR is not required, and the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 5:

The Supplemental EIR fails to adequately analyze the project's impacts on housing and population. The project does not adequately mitigate its impacts on gentrification and displacement of low to moderate income populations in the City. The Supplemental EIR inaccurately tiers its analysis from the old 2007 EIR for the proposed project.

Staff Response: While CEQA requires an analysis of whether or not a project would displace substantial numbers of people or existing housing, necessitating the

construction of replacement housing elsewhere, CEQA does not require an analysis of socioeconomic effects, including gentrification.

With regards to the proposed project's impacts on displacement, the project's potential impacts on housing and population were fully analyzed in Section IV.G. Population, Housing & Employment of the Draft Supplemental EIR, which determined that the proposed project would have no impact on housing population displacement. In October 2007, the Community Redevelopment Agency (CRA) certified the EIR (Certified EIR) for the demolition of then-existing nine (9) dwelling units on the project site the development of a 23-story mixed-use project containing 311 multi-family residences, approximately 53,500 square feet of commercial space, a 21,177square-foot public park, 508 parking spaces, and two (2) supergraphic signs (CRA Approved Project). The Certified EIR determined that the CRA Approved Project would not result in a significant impact with regard to population or housing displacement, as replacement housing for the nine (9) dwelling units that existed on the site would be provided by the new housing units that would be developed on the site. The proposed project does not change the Certified EIR's conclusion since the proposed project would continue to provide replacement housing units that would exceed the nine (9) dwelling units that previously existed on the site. In addition, the proposed project includes affordable housing units that were not proposed under the CRA Approved Project analyzed in the Certified EIR. Therefore, mitigation is not necessary for the proposed project, because it would not result in an impact to displacement of people or housing under CEQA. Therefore, the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 6:

The Supplemental EIR does not adequately describe the project, because it provides a flexible list of entitlements, and mentions a parking ordinance alternative without providing a full environmental analysis of that alternative or identifying which of the parking alternatives would be the environmentally preferred alternative as required by CEQA.

Staff Response:

Pursuant to State CEQA Statutes and Guidelines Section 15124, the description of the project [...] should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. Section 15124 also requires a list of permits and other approvals required to implement the project be included in the project description to the extent that the information is known to the lead agency. All of the potential permits and approvals for the proposed project are identified on pages II-41 through II-42 in Section II. Project Description of the Draft Supplemental EIR. All permits and approval listed in the Draft Supplemental EIR were known to the lead agency at the time the Draft Supplemental EIR was published. The inclusion of language "would include, but may not be limited to" in the project description acknowledges the fact that the Supplemental EIR is an informational document and informs the decision makers of the potential approvals that could be required and that the ultimate approvals are subject to the discretion of the decision makers. Furthermore, such language does not render the project description unstable, incomplete or inaccurate.

The Draft Supplemental EIR identifies a "No Automated Steel Parking Structure Alternative" as one of reasonable alternatives to the proposed project. This Alternative requires the adoption of an Ordinance to reduce the clear space required at structural elements in the parking structure and allow up to 66 percent of the proposed project's parking stalls to be compact parking stalls, in lieu of constructing a new automated steel parking structure. The Draft Supplemental EIR includes a complete analysis of potential traffic and transportation impacts resulting from this Alternative in Section IV.K.1, Traffic/Transportation and Section IV.K.2, Parking. The Draft Supplemental EIR explains that under this alternative, the proposed project would provide approximately 508 parking spaces within the three levels of subterranean parking and three levels of above-grade parking. This Alternative would not encourage additional vehicle trips to the project site. The trip generation for the proposed project is based on the proposed mix of uses (residential, office, restaurant, retail and coffee shop), and providing additional parking spaces for those uses would not modify the proposed mix of uses or demand for those uses. Therefore, the additional parking spaces would not modify the vehicle trip assumptions for the proposed project. The Draft Supplemental EIR concludes that the "No Automated Steel Parking Structure Alternative" will not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The appellant contends that the Supplemental EIR does not identify which of the parking alternatives would be the environmentally preferred alternative as required by CEQA. To the contrary, Section VI, Alternatives to the proposed project of the Draft Supplemental EIR clearly states that the environmentally superior alternative is the "No Automated Steel Parking Structure Alternative," because this Alternative would slightly reduce the intensity of the significant and unavoidable noise impact as compared to the proposed project as this Alternative would include less exterior construction activities than the proposed project. As such, the Draft Supplemental EIR did analyze potential environmental impacts of the "No Automated Steel Parking Structure Alternative" and identified this Alternative as environmentally superior to the proposed project. Therefore, the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 7:

The Supplemental EIR adopts unduly narrow project objectives by strictly defining affordable housing for the project at five percent. Project objectives should not be so narrowly defined that they preclude consideration of reasonable alternatives for achieving the project's underlying purpose.

Staff Response:

Pursuant to State CEQA Statutes and Guidelines Section 15124, the description of the project shall contain a statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

The Statement of Project Objectives for the proposed project is discussed on page II-10 in Section II. Project Description of the Draft Supplemental EIR. which states the underlying purpose of the proposed project is to meet the demand for mid- to high-rise residential living and provide neighborhoodserving retail uses and additional office space in the Hollywood area of the City of Los Angeles. The objective "to promote affordable housing by including 5 percent affordable housing units at the 'Very Low' income level" is disclosed in the Draft Supplemental EIR to further the proposed project's underlying purpose and also to provide a written statement to the lead agency to develop a reasonable range of alternatives to evaluate in the EIR. The project objectives, taken as a whole, do not preclude the consideration of project alternatives that achieve the project's underlying purpose, meaning this objective does not preclude the lead agency from its discretion to identify and pursue a higher percentage of affordable housing units as an alternative to the 5 percent as stated in the objective. Furthermore, changing the affordable housing percentage provided by the proposed project would not change the conclusions in the Supplemental EIR stating that the proposed project would have a less-than-significant impact to population, housing and employment. In addition, as of July 26, 2018, the applicant has agreed to update its application to increase the amount of affordable housing in the project from 5 percent of the total units for Very Low Income households to 10 percent of the total units for Very Low Income households and workforce housing. Therefore, the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 8:

The Supplemental EIR s impermissibly vague and defers critical details of mitigation measures.

Staff Response:

State CEQA Statutes and Guidelines Section 15126.4(a)(1)(B) explains that the formulation of mitigation measures after adoption is allowed when the mitigation measures "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." Accordingly, the proposed project's mitigation measures include performance standards. In addition, the nine (9) mitigation measures the appellant mentions in the appeal application are mitigation measures that were originally approved by the CRA in connection with its certification of the Certified EIR for the CRA Approved Project. As explained in Section I. Introduction/Executive Summary at pages I-14 - I-15 of the Draft Supplemental EIR, the proposed project contained two sets of mitigation measures: (1) Certified EIR Mitigation Measures, which are mitigation measures that the proposed project would continue to implement that were included in the Certified EIR; and (2) Mitigation Measures, which are mitigation measures the proposed project would implement that were not included in the Certified EIR to account for any physical or regulatory changes to the circumstances under which the proposed project is being undertaken. The CRA adopted the Certified EIR in October 2007 and subsequently adopted the mitigation monitoring and reporting program, which included the Certified EIR Mitigation Measures, in December 2007. All of the nine (9) mitigation measures the appellant claims are vague and deferring critical details are Certified EIR Mitigation Measures that were already originally

approved and adopted by the CRA as part of its certification of the Certified EIR.

In addition, the appellant's appeal points are the same comments the Aids Healthcare Foundation submitted in response to the Draft Supplemental EIR. A thorough and detailed response to this appeal point and each of the nine (9) mitigation measures is included in the Final Supplemental EIR under Responses to Comments 5 A.9 through 5 A.19 in Section III.B, Responses to Comment Letters at pages II.B-42 through 56. The Final Supplemental EIR Responses to Comments addresses a clear and detailed explanation of how and each mitigation measure complies with CEQA. Therefore, the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 9:

The project requires an entirely new environmental impact report or a subsequent environmental impact report. The totality of the circumstances demonstrate that the current project is an entirely new project. Due to changes in the plans, circumstances and available information concerning the project, the previous EIR for the project lacks informational value. The previous approvals for the project have been vacated by the Court as they were based upon the preservation of the Old Spaghetti Factory façade rather than the rebuilding and restoration of it.

Staff Response:

The Supplemental EIR prepared for the proposed project is the appropriate CEQA document to analyze the Modified' Project's potential effects on the environment. The Supplemental EIR was prepared pursuant to State CEQA Statutes and Guidelines Sections 15163 and 21166, which state that where an EIR has been prepared for a project and substantial changes are proposed that will require major revisions of the EIR, then either a subsequent or supplemental EIR is required. A supplemental EIR may be prepared if only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

As previously mentioned, in October 2007, the CRA certified the EIR (Certified EIR) for the demolition of then-existing nine (9) dwelling units on the project site the development of a 23-story mixed-use project containing 311 multifamily residences, approximately 53,500 square feet of commercial space, a 21,177-square-foot public park, 508 parking spaces, and two (2) supergraphic signs (CRA Approved Project).

The applicant is proposing limited modifications to the CRA Approved Project in the proposed project, and only minor additions or changes were necessary to make the Certified EIR adequate to apply to the proposed project. The CRA Approved Project proposed the demolition of then-existing structures on the project site and the development of an approximately 324,432-square-foot mixed-use project including 311 dwelling units, approximately 53,500 square feet of commercial space, a 21,177-square-foot public park, two (2) supergraphic signs, and 508 parking spaces. The CRA Approved Project proposed a 23-story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure. The proposed project is a similar development, involving all of the same uses as

the CRA Approved Project, of which most are slightly smaller under the proposed project.

The applicant proposes a new two-level automated steel parking structure to be located above the parking area on Level L3 of the podium structure as part of the proposed project. The proposed project with the new automated steel parking structure would provide a total of 428 parking spaces consisting of 353 residential parking space and 75 commercial parking spaces. However, the Supplemental EIR identified the "No Automated Steel Parking Structure Alternative" as the Environmentally Superior Alternative to the proposed project. This Alternative would not involve the construction of the new automated steel parking structure. Instead, it requires the adoption of an Ordinance to reduce the clear space required at structural elements in the parking structure and allow up to 66 percent of the proposed project's parking stalls to be compact parking stalls. Under this Alternative, the proposed project would provide approximately 508 parking spaces within the existing three levels of subterranean parking and three levels of above-grade parking without the need to construct the new automated steel parking structure. The following table compares the CRA Approved Project analyzed in the Certified EIR and the proposed project analyzed in the Supplemental EIR.

Table 2. Project Comparison

	CRA Approved Project	Modified Project	
Dwelling Units	311 (No Restricted Affordable Units)	299 (15 Very Low Income units, 15 workforce housing units and 269 market-rate units)	
Floor Area	324,432 SF	324,693 SF	
Commercial Space	53,500 SF	46,110 SF	
Parking	508 508 ²		
Public Park	21,177 SF	18,962 SF	
Height	260 feet; 23 stories with 18-story residential tower above 5-level podium	250 feet; 22 stories with 18-floor residential tower above 4-level podium	
Signage	2 Supergraphics	No Supergraphics	

As such, the physical changes between the proposed project and the CRA Approved Project are extremely minor, and thus the Certified EIR continues to provide informational value for the environmental analysis of the proposed project.

In addition, the Draft Supplemental EIR evaluates: 1) changes between the CRA Approved and the proposed project; 2) changes with respect to the circumstances under which the CRA Approved and the proposed project are

² The number of spaces is based on the "No Automated Parking Structure Alternative" identified in the Supplemental EIR.

being undertaken; and 3) any new information, which was not known and could not have been known at the time of the Certified EIR for the CRA Approved Project. By providing these comparisons, the environmental analysis addresses each of the potential environmental effects of the proposed project as compared to the CRA Approved Project and demonstrates that the Certified EIR retains informational value for the decision makers.

The appellant contends that an entirely new EIR based upon current environmental conditions presuming the non-existence of the currently illegal structure is required. In compliance with State CEQA Statues and Guidelines Section 15125, the Draft Supplemental EIR provides a description of the physical environmental conditions in the vicinity of the project site as they existed at the time the notice of preparation was published. Furthermore, the Draft Supplemental EIR discusses the fact that a vacant mixed-use building and public park currently occupy the project site. However, the Draft Supplemental EIR's environmental analysis of the proposed project does not take credit for the existing vacant building and the park on the project site. While the Draft Supplemental EIR updates the current environmental setting to account for the existing building and public park, the Draft Supplemental EIR includes a complete environmental analysis of the proposed project including an analysis of the construction of the existing building and public park.

The appellant also contends that the Certified EIR lacks informational value since it has been more than 10 years since the certification of the Certified EIR. Length of time is not a controlling factor in determining whether a previously certified EIR maintains informational value. In addition, as explained, the Certified EIR maintains substantial informational value for the environmental analysis of the proposed project given that the overall physical changes between the CRA Approved Project and the proposed project are minor, and the Draft Supplemental EIR discloses the entirety of the proposed and settings as well as a complete environmental analysis of the proposed project.

Regarding the appellant's comment about the Old Spaghetti Factory building (OSF Building), the proposed project's proposal for the OSF Building is consistent with the Certified EIR, as the Certified EIR explained that the applicant is exploring options to retain and restore the exterior facade and various interior treatments of OSF Building. The Certified EIR further explained the proposal as a partial structural treatment plan to retain and incorporate a portion of the OSF Building as a prominent design element at the corner of Sunset Boulevard and Gordon Street. The Certified EIR explained that since none of the buildings located on the project site were deemed historically or culturally significant, demolition and/or remodel of these structures would not significantly impact any historic or cultural resource. The proposed project would demolish the OSF Building and incorporate a replica of its facade in approximately the same position and dimensions of the demolished building, which is consistent with the Certified EIR's description of the option to not retain and/or restore the building façade, but instead to memorialize the social significance of this building. Therefore,

> the Advisory Agency did not err or abuse his discretion in certifying and adopting the Supplemental EIR and approving VTT-74172.

Appeal Point 10: The Hollywood Community Plan states that no increase in density shall be effected by zone change or subdivision unless it is determined that the City's circulation system is adequate to serve the traffic generated, and requires the City to prepare a station area master plan prior to permitting higher intensity development in the vicinity of Metro Rail stations per the Hollywood Community Plan. The proposed project will have significant traffic impacts and no master plan has been adopted for the area surrounding the Metro Rail Station. Therefore, the project's proposed General Plan Amendment, Height and Zone Changes and Vesting Tentative Tract Map fail to comply with the Hollywood Community Plan.

Staff Response:

The Hollywood Community Plan states that arterials and local streets shall be developed in accordance with standards and criteria contained in the Mobility Plan 2035 and the City's Standard Street Dimensions. The project site adjoins Sunset Boulevard to the south and Gordon Street to the west. Sunset Boulevard is an Avenue I under the Mobility Plan 2035 with a designated full right-of-way width of 100 feet and roadway width of 70 feet. The street is currently improved to the required standards with a 100-foot full right-of-way, 70-foot roadway, and 15-foot sidewalks. Gordon Street is a Local Limited Street under the Mobility Plan 2035 with a designated full right-of-way width of 50 feet and roadway width of 30 feet. The street is currently improved to the required standards with a 52- to 53-foot full right-of-way, 36-foot roadway. and 8 to 9-foot sidewalks. Therefore, the streets adjacent to the proposed development are developed in accordance with the Mobility Plan 2035.

The Vesting Tentative Tract Map was distributed to the Subdivision Committee, including the Los Angeles Department of Building and Safety (LADBS) and the Department of Transportation (LADOT), prior to the Advisory Agency's approval of the Vesting Tentative Tract Map. Both Departments reviewed and submitted comments, which have been incorporated as Conditions of Approval Nos. 1-8 and 12 (Exhibit C). Neither of the Departments recommended denial of the Vesting Tentative Tract Map or raised an issue regarding the adequacy of the circulation system to serve any traffic that would be generated by the proposed project.

The appellant contends that a station area master plan must be prepared for the proposed project. However, while the Hollywood Community Plan recommends a station area master plan be prepared if higher intensity development is to be encouraged in the vicinity of Metro Rail Stations, the master plan is not a requirement for the approval of a Vesting Tentative Tract Map. Furthermore, as discussed on pages IV.K.1-53 through IV.K.1-56 in Section IV.K.1, Traffic/Transportation of the Draft Supplemental EIR, the proposed project is not expected to result in any long-term impacts on transit services. The Draft Supplemental EIR anticipates that the proposed project transit ridership would utilize approximately 0.4 percent of available transit capacity during the peak hours, and related projects along with the proposed project are conservatively estimated to generate transit trips that represent approximately 3.5 percent of the available transit capacity during the peak

hours. Additionally, the project site and the greater Hollywood area are served by a considerable amount of transit service, including the Metro Red Line, several rapid and local bus routes and LADOT service. Therefore, there is sufficient transit capacity for the related projects as well as the proposed project.

The Draft Supplemental EIR analyzes the proposed project's potential impacts associated with traffic/transportation based on the Traffic Impact Analysis prepared by Overland Traffic Consultants, Inc. for the proposed project, dated October 2016; Traffic Impact Analysis prepared by Overland Traffic Consultants, Inc. for the CRA Approved Project, dated November 2006; Neighborhood Traffic Analysis prepared by Overland Traffic Consultants, Inc. for the CRA Approved Project, dated February 2007; and analysis provided in the CRA Approved Project's Certified EIR.

The Supplemental EIR concludes that the proposed project's (with or without the automated steel parking structure) impacts to traffic during construction would be less than significant at all of the 20 intersections studied in the Traffic Impact Analysis during both the A.M. and P.M. peak hours with implementation of Mitigation Measures MM IV.K.1-1, MM IV.K.1-2, and MM IV.K.1-3. In addition, the proposed project would implement Regulatory Compliance Measure CM K.1-1, which includes approval of a Construction Traffic Control/Management Plan and the maintenance of existing site access to ensure that emergency access to the site is maintained at all times and further reduce impacts related to traffic construction. In addition, the proposed project would implement Certified EIR Mitigation Measure MM IV.K.1-2, which would bind the applicant to specific haul route conditions if the applicant needs to obtain a haul route permit for the proposed project's additional construction activities. The implementation of the Regulatory Compliance Measure and Certified EIR Mitigation Measure would further reduce impacts related to traffic during the construction period. Accordingly, as compared to the CRA Approved Project, the proposed proposed project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during construction.

In addition, the Supplemental EIR concluded that the "No Automated Steel Parking Structure Alternative" would not encourage additional vehicle trips to the project site because trip generation for the proposed project is based on the proposed mix of uses rather than the number of parking spaces, and providing additional parking spaces for those uses would not modify the proposed mix of uses or demand for those uses. Therefore, the additional parking spaces as a result of the "No Automated Steel Parking Structure Alternative" would not modify the vehicle trip assumptions for the proposed project, and like the proposed project, implementation of above-referenced mitigation measures would reduce the impacts from the "No Automated Steel Parking Structure Alternative" during the A.M. and P.M. peak hour to a less-than-significant level.

Furthermore, the proposed project would have a less-than-significant impact upon roadway segment traffic volumes, Congestion Management Program (CMP) network, alternative transportation facilities, pedestrian safety and

> circulation patterns, and project access. In addition, the proposed proposed project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to roadway segment traffic volumes, CMP network, alternative transportation facilities, pedestrian safety and circulation patterns, and project access. The applicant is required to comply with all Regulatory Compliance Measures, Mitigation Measures and Project Design Features identified in the Supplemental EIR per Condition of Approval No. 25 in the Advisory Agency's Letter of Determination (Exhibit C).

> Lastly, the General Plan Amendment and Height and Zone Changes are within the jurisdiction of the City Planning Commission under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The Advisory Agency does not have the authority to grant or deny a Conditional Use Permit. In addition, the approval of VTT-74172 was contingent upon the approval of the related related CPC Case per the following Condition of Approval No. 20 in the Letter of Determination that reads (Exhibit C):

Prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider shall submit a tract modification.

In the event the related CPC case is denied, the applicant is required to modify the tract map and request a Modification to the subject VTT case. Therefore, the Advisory Agency did not err or abuse his discretion in approving VTT-74172.

Appeal Point 11: The General Plan Amendment, by effectively spot-zoning the project site and granting special entitlements, violates the City Charter. The project will have a significant impact on land use, because the proposed General Plan Amendments and Vesting Zone and Height District changes are inconsistent with the City's General Plan and Hollywood Community Plan.

Staff Response:

This appeal point addresses entitlements request that are within the jurisdiction of the City Planning Commission under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The Advisory Agency does not have the authority to grant or deny General Plan Amendment and Vesting Zone and Height District requests. In addition, the approval of VTT-74172 was contingent upon the approval of the related CPC Case per the following Condition of Approval No. 20 in the Letter of Determination that reads (Exhibit C):

Prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider shall submit a tract modification.

Therefore, this appeal point is not relevant to the Advisory Agency's decision to approve VTT-74172.

Appeal Point 12: Approval of a Conditional Use Permit to allow the sale of alcoholic beverages

for on-site consumption at the project violates LAMC 12.24 W.1.

Staff Response: This appeal point addresses an entitlement request that is within the

jurisdiction of the City Planning Commission under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The Advisory Agency does not have the authority to grant or deny a Conditional Use Permit. In addition, the approval of VTT-74172 was contingent upon the approval of the related CPC Case per the following Condition of Approval No. 20 in the Letter of

Determination that reads (Exhibit C):

Prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider shall submit a tract modification.

Therefore, this appeal point is not relevant to the Advisory Agency's decision to approve VTT-74172.

STAFF RECOMMENDATION:

In consideration of the foregoing, it is submitted that the Advisory Agency acted reasonably in approving Case No. VTT-74172. Staff recommends that the City Planning Commission <u>Deny</u> the appeal; <u>Find</u> that the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report (EIR), State Clearinghouse No. 2006111135, adopted by the Community Redevelopment Agency (CRA) on October 18, 2007 (Sunset and Gordon Mixed-Use Project EIR), and the information contained in the Erratum to the EIR, dated October 10, 2007 and Addendum to the EIR, dated February 29, 2008, and Supplemental EIR prepared for this project, which includes the Draft Supplemental EIR, No. ENV-2015-1923-EIR, State Clearinghouse No. 2006111135, dated August 24, 2017, and the Final Supplemental EIR, May 25, 2018 (Sunset and Gordon Mixed-Use Project Supplemental EIR), as well as the whole of the administrative record; <u>Certify</u> and <u>Adopt</u> the Supplemental EIR, Statement of Overriding Considerations, and Mitigation Monitoring Program prepared for the Supplemental EIR; <u>Sustain</u> the Advisory Agency's determination to approve Vesting Tentative Tract Map No. 74172; and Adopt the Advisory Agency's Conditions of Approval and Findings.

EXHIBIT A

Appeal Application

ORIGINAL



APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

T _e	APPELLAN I BODY/CASE INFORMATION				
	Appellant Body:				
	☐ Area Planning Commission ☐ City Planning Commission ☐ City Council ☐ Director of Planning				
	Regarding Case Number: Vesting Tentative Tract No. 74172; 1				
	Project Address: 5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street				
	Final Date to Appeal: 07/09/2018				
	Type of Appeal by Applicant/Owner Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved Appeal from a determination made by the Department of Building and Safety				
2.	APPELLANT INFORMATION				
	Appellant's name (print): Mitchell M. Tsal, Attorney for Coalition to Preserve LA				
	Company: Coalition to Preserve LA				
	Mailing Address: 6500 Sunset Boulevard				
	City: Los Angeles State: California Zip: 90028				
	Telephone: (626) 381-9248 E-mail: mitch@mitchtsailaw.com				
	Is the appeal being filed on your behalf or on behalf of another party, organization or company?				
	☐ Self ☑ Other: Coalition to Preserve LA				
2	Is the appeal being filed to support the original applicant's position? Yes No				
3.	REPRESENTATIVE/AGENT INFORMATION				
	Representative/Agent name (if applicable): Mitchell M. Tsei				
	Company: Mitchell M. Tsal, Attorney at Law				
	Mailing Address: 155 South El Molino Avenue, Suite 104				
	City: Pasadena State: California Zip: 91101				
	Telephone: (626) 381-9248 E-mail: mitch@mitchtseilaw.com				

4.	JUS	STIFICA	TION/REASON FOR	APPEAL		ä		
	ls th	ne entire	decision, or only parts	s of it being appealed?	☑ Entire	☐ Part		
	Are	specific	conditions of approva	being appealed?	□ Yes	☑ No		
	lf	Yes, list	the condition number	(s) here:				
	Atta	ch a sep	parate sheet providing	your reasons for the appea	l. Your reason mu	st state:		
	6	The rea	son for the appeal	How you are age	grieved by the deci	sion		
	0	Specific	ally the points at issue	Why you believe	the decision-make	er erred or abused their discretion		
5.	APP	LICAN	T'S AFFIDAVIT					
	cer	tify that	the statements contain	and in this application are c	omplete and true:			
	App	ellant Si	gnature:		- Manager	Date: July 6, 2018		
6.	FILI	NG REC	DUIREMENTS/ACCITY	ONAL INFORMATION		,		
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	 All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt. 							
	 Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt. 							
	 A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may <u>riot</u> file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an <u>individual on behalf of self</u>. 							
	 Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation). 							
	 Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the <u>date of the written determination</u> of said Commission. 							
 A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)]. 								
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155 South El Molino Avenue Suite 104 Pasadena, California 91101

VIA HAND DELIVERY & E-MAIL

July 6, 2018

Hand Delivered to: City of Los Angeles Advisory Agency 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012

Mindy Nguyen 200 North Spring Street, Room 621 Los Angeles, CA 90012 Em: mindy.nguyen@lacity.org

Nuri Cho 200 North Spring Street, Room 621 Los Angeles, CA 90012 Em: nuri.cho@lacity.org

E: 5929-5945 W. Sunset Boulevard / 1512-1540 N. Gordon Street, Los Angeles, California 90028/Sunset and Gordon Mixed Use Project (Case No. ENV-2015-1923-EIR, VTT-74172, CPC-2015-1922-GPA-VZC-HD CUB DB-SPR).

On behalf of the Coalition to Preserve LA ("Commenter" or "Coalition"), my Office is submitting an appeal of the City of Los Angeles' Advisory Agency's June 29, 2018 approval of Vesting Tentative Tract No. 74172, its related CEQA findings (ENV-2015-1923-EIR, as well as all related approvals included CPC-2015-1922, GPA-VZC-HD-CUB-DB-SPR, which includes a General Plan Amendment to amend the 1988 Hollywood Community Plan to redesignate the portion of the Proejct Site located at 1528 – 1540 N. Gordon Street (Lots 17,18 and 19 of Bagnoli Tract No. 2) from High Medium Residential to Regional Center Commercial, a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D to permit a maximum allowable Floor Area Ration (FAR) not to exceed 4.5:1, a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant, a density bonus to set aside 15 units for Very Low Income households, and a Site Plan Review for a project which creates or results in an increase of 50 or more dwelling units.

Coalition is a nonprofit organization in Los Angeles that advocates for smart land use planning, government transparency, open space, affordable housing, support for the City's homeless population, and against gentrification. Coalition, its employees, customers, and the many persons whom Coalition serves are beneficially interested in and will be impacted by the outcome of this Project.

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Commenter expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); Bakersfield Citizens for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see Galante Vineyards v. Monterey Water Dist. (1997) 60 Cal. App. 4th 1109, 1121.

Commenter incorporates by reference all comments raising issues regarding the SEIR submitted prior to certification of the SEIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 CA4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

I. EXPERTS

This comment letter includes comments from a scientific and technical expert Robert Kahn concerning the SEIR. His comments, attachments, and CV are attached hereto and are incorporated herein by reference.

Robert Kahn, P.E., ("Mr. Kahn") has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his bachelor's degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. He developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and

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numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

II. BACKGROUND ON THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations ("CCR" or "CEQA Guidelines") § 15002(a)(1). "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal. 3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs. (2001) 91 Cal. App. 4th 1344, 1354 ("Berkeley Jets"); County of Inyo v. Yorty (1973) 32 Cal. App. 3d 795, 810.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). See also, Berkeley Jets, 91 Cal. App. 4th 1344, 1354; Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; Laurel Heights Improvement Ass'n v. Regents of the University of California (1988) 47 Cal.3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position.' A 'clearly inadequate or unsupported study is entitled to no judicial deference." *Berkeley Jets*, 91 Cal.App.4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal.3d at 391, 409 fn. 12). As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the

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project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. Communities for a Better Environment v. Richmond (2010) 184 Cal. App. 4th 70, 80 (quoting Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 449–450)

III. THE SEIR FAILS TO COMPLY WITH CEQA

- A. The SEIR Fails To Adequately Analyze Or Disclose Significant Transportation Impacts
 - 1. The SEIR fails to adequately disclose the Project's impact on local neighborhood streets

As transportation expert Mr. Kahn notes, the Project will have direct significant impacts on surrounding neighborhood street systems. The SEIR underestimates traffic impacts, excluding the traffic generated by the residential portion of the Project (totaling 1,789 trips) from its analysis of impacts on neighborhood residential streets. Kahn at 4. Kahn's analysis shows that after including residential traffic related to the Project, that the Project would have significant, unmitigated impacts on both Gordon Avenue as well as Carlton Way. Kahn at 6 tbl. 13b.

The City claims that its Transportation Impact Study Guidelines don't require it to include traffic from the residential portions of the Project Site. However, mere compliance with a regulatory standard, such as the City's Transportation Impact Study Guidelines, cannot "be applied so as to foreclose consideration of substantial evidence showing a significant environmental impact from a project." East Sacramento Partnerships for a Livable City v. City of Sacramento (2016) 5 Cal. App. 5th 281, 301. Even if the City's Transportation Impact Study Guidelines allowed for the exclusion of traffic generated by the residential portion of a mixed-use Project, it doesn't, the Transportation Impact Study Guidelines bear little weight on the City's compliance with CEQA.

As already previously mentioned, the City's Transportation Impact Study Guidelines, local CEQA significance thresholds and the CEQA Guidelines do not exclude residential traffic from analysis of residential street impacts. The City's Transportation Impact Study Guidelines merely note that "commercial development projects may be required to conduct residential street impact analysis." City of Los Angeles (2016) Transportation Impact Study Guidelines 8 – 9. They certainly don't mandate the exclusion of the residential traffic attributed to mixed-use projects such as this one. Moreover, the City of Los Angeles' guidance for CEQA significance thresholds similarly doesn't distinguish between commercial versus residential traffic, simply noting that an EIR should evaluate the "impacts of traffic generated by the project, and/or traffic diverted or shifted due to the project, on local streets in residential neighborhoods." City of Los Angeles (2006) L.A. CEQA Thresholds Guide at L.4-1 – 4. Finally, Appendix G of the CEQA Guidelines also doesn't exclude traffic generated by the residential portion of a mixed-use project, merely requiring that an EIR evaluate any "increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system" CEQA Guidelines Appdx. G XV.a.

The SEIR fails to disclose significant traffic impacts at the intersection of Vine and Sunset

The SEIR fails to disclose a significant traffic impact at the corner of Vine and Sunset. As Mr. Kahn notes, the SEIR understates the Project's transportation impacts by understating the amount of traffic that could take an alternative route to the Project via Vine or Argyle street, so much so that the addition of just one (1) more project trip making the southbound left turn at the intersection would make the project have a significant impact even with the proposed TDM plan." Kahn at 2. The SEIR fails to disclose a significant impact on the intersection of Vine and Sunset.

3. The SEIR fails to disclose significant traffic impacts on Gordon Street from vehicles queuing to enter the Project

The SEIR fails to disclose a significant impact from queuing vehicles entering the Project on Gordon Street from inadequate storage for the vehicle queues for the Project. According to Mr. Kahn:

However, in reviewing the detailed site plan it appears that the queuing for the residential gates was to occur in a short left turn pocket located away from the actual residential gate. It is likely that residential vehicles will creep up towards the gate itself and block circulation leaving the project. This will also result in conflicts with the "Flex" parking spaces that will need to back into the main circulation aisle. Furthermore, there is no means for vehicles who accidentally enter the left turn pocket to make a U-turn out of the site in the event they erroneously enter the building, because there is insufficient turn around space.

Finally[,] how will guests enter the residential gated area? The queuing into the residential area would be much longer than assumed in the study and would cause additional queuing blocking the entrance to the site and back into Gordon Street. The time for non-residents to open the gate would be substantially longer. Therefore queuing of the project traffic onto Gordon will cause delays to through traffic on the street. Which will cause delays to existing traffic. How will this be addressed and what are the potential impacts to both on-site and off-site traffic?

Kahn at 3. The SEIR fails to disclose traffic impacts on Gordon Street as it underestimates the length of vehicle queues likely to form from vehicles attempting to enter the Project.

4. The SEIR Should Be Recirculated Due To Significant New Information Unveiled In the Final SEIR

CEQA requires that an agency recirculate an environmental impact report "when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . but before circulation." CEQA Guidelines § 15088.5; PRC § 21083.

Here, the Final SEIR adopted new transportation mitigation measures, including a new transportation demand management plan to mitigate previously undisclosed transportation impacts not disclosed in the Draft SEIR. The City is required to recirculate the Draft SEIR with the revised traffic analysis and mitigation measures and for a new round of public comment prior to certification.

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B. The SEIR Fails To Adequately Analyze The Project's Impacts On Housing and Population.

The SEIR fails to adequately analyze or mitigate its impacts on housing and population. By allocating a mere 5 percent of the units in the Project to affordable housing, the Project does not adequately mitigate its impacts on gentrification and displacement of low to moderate income populations in the City of Los Angeles.

Urban revitalization, such as new housing stock as proposed by the Project, can have devastating impacts on low-income residents in a neighborhood. As the City's Housing and Community Investment Department noted in 2015 "[t]he significant urban renewal taking place in many of the city's traditional lower income and diverse neighborhoods is further exacerbating the high housing costs. . . . , revitalization can . . . have a devastating impact for low-income renters who are least able to withstand increasing housing costs."

The SEIR fails to account for the mismatch between the mix of housing set to be made available by the Project and the housing needs within the City of Los Angeles. As HCID notes "[a] contributing factor to the acute housing affordability problem is a mismatch between what is being built and what needs to be built." The SEIR itself supports the fact that allocating a mere five percent of units towards very low income households is inadequate, citing to the City's 2014 – 2021 Regional Housing Needs Assessment Allocation that notes that at least 12.5 percent of the City's housing stock needs to be allocated towards very low income households and that 40.2 percent of the City's overall housing supply needed to be allocated to low income households overall.

The SEIR inaccurately tiers its analysis from the soon to be more than ten-years old 2007 EIR for the Project, even though rapid economic growth and accompanying population boom in the City of Los Angeles has significantly modified the situation.

C. The SEIR Does Not Adequately Describe The Project

The SEIR fails to provide a stable, complete and accurate Project Description. "An accurate, stable and finite project description is the sine qua non of an informative and legally adequate EIR." County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192; Berkeley Jets, supra, 91 Cal.App.4th at 1354; Sacramento Old City Assn. v. City Council (1991) 229 Cal.App.3d 1011, 1023; Stanislaus Natural Heritage Project v. County of Stanislaus (1996) 48 Cal.App.4th 182, 201. "[A] curtailed or distorted project description," on the other hand, "may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives

 $^{^1}$ Los Angeles Housing & Community Development Department (2015) REPORT BACK IDENTIFYING LOCAL, PERMANENT FUNDING SOURCE(S) FOR THE CITY'S AFFORDABLE HOUSING TRUST FUND (AHTF) AND REQUEST TO FUND A NEW AFFORDABLE HOUSING BENEFIT FEE STUDY 3. 2 Id.

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in the balance." *Id.*; see also CEQA Guideline § 15124; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438. As one analyst has noted:

The adequacy of an EIR's project description is closely linked to the adequacy of the EIR's analysis of the project's environmental effects. If the description is inadequate because it fails to discuss the complete project, the environmental analysis will probably reflect the same mistake.

Stephen L. Kostka, Michael H. Zischke (2013) Practice Under the California Environmental Quality Act 580. A "rigorous analysis" is required to dispose of an impact as insignificant. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. Such a rigorous analysis is not possible if the project description is inaccurate, inconsistent, or misleading.

Here, the SEIR fails to provide an adequate project description as it provides a flexible list of entitlements which "include, but may not be limited to" a general plan amendment, vesting zone, height district change, among others. In addition, the SEIR mentions a parking alternative, without providing a full environmental analysis of that alternative (noticeably omitting any transportation analysis of the implications of providing a full 508 parking spaces on transportation, induced travel and greenhouse gas emissions) or identifying which of the parking alternatives would be the environmentally preferred alternative as required by CEQA.

D. THE SEIR ADOPTS UNDULY NARROW PROJECT OBJECTIVES.

The SEIR unduly constrains the range of alternatives that could be considered for the Project with regards to affordable housing by strictly defining affordable housing for the Project at five percent. Project objectives should not be so narrowly defined that they preclude consideration of reasonable alternatives for achieving the project's underlying purpose. North Coast Rivers Alliance v Kawamura (2015) 243 Cal. App. 4th 647, 668.

The SEIR defines the Project's objective as "[t]o promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level." SEIR at II-10. By defining one of the Project's objectives as the Project itself, which provides 5% affordable housing units at the very low income level, the SEIR adopts an unduly narrow set of project objectives.

E. THE SEIR DOES NOT ANALYZE THE ENVIRONMENTAL IMPACTS OF THE CLEAR SPACE REDUCTION ORDINANCE.

The SEIR notes that the Project may be modified by "approval of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66% of the Modified Project's parking stalls to be compact parking stalls to increase the available on-site parking supply." SEIR at II-4. The SEIR, while mentioning the potential ordinance, ignores the potential transportation, parking and other environmental impacts of providing excess parking at the Project.

The additional parking spaces called for as part of the Clear Space Reduction Ordinance would significantly increase the Project's transportation impacts. As Mr. Kahn states:

The additional parking spaces could encourage additional traffic generation that would impact study area intersections and surrounding roadway conditions. Any change in the parking provisions will have to be reassessed in an additional environmental document and traffic study to access the impact of these changes. The increase in parking beyond what is required could serve other uses either within the Site or in adjacent areas. This would generate additional traffic beyond what was assessed in the supplemental EIR. This needs to be evaluated if it is to be considered as part of the project.

(RK Engineering, pg 5). The Clean Space Ordinance would have significant environmental impacts that are not disclosed as part of the Project.

F. The SEIR Is Impermissibly Vague And Defers Critical Details of Mitigation Measures

The SEIR improperly defers critical details of mitigation measures. Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency's decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. CEQA Guidelines § 15126.4(a)(1)(B) ("...[f]ormulation of mitigation measures should not be deferred until some future time.").

Deferring critical details of mitigation measures undermines CEQA's purpose as a public information and decision-making statute. "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." Communities for a Better Environment v. City of Richmond (2010) 184 Cal. App. 4th 70, 92 ("Communities"). As the Court noted in Sundstrom v. County of Mendocino (1988) 202 Cal. App. 3d 296, 307, "[a] study conducted after approval of a project will inevitably have a diminished influence on decision-making. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA."

A lead agency's adoption of an EIR's proposed mitigation measure for a significant environmental effect that merely states a "generalized goal" to mitigate a significant effect without committing to any specific criteria or standard of performance violates CEQA by improperly deferring the formulation and adoption of enforceable mitigation measures. San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 670; Communities, 184 Cal.App.4th at 93 ("EIR merely proposes a generalized goal of no net increase in greenhouse gas emissions and then sets out a handful of cursorily described mitigation measures for future consideration that might serve to mitigate the [project's significant environmental effects."); cf. Sacramento Old City Assn. v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029 (upheld EIR that set forth a range of mitigation measures to offset significant traffic impacts where performance criteria would have to be met, even though further study was needed and EIR did not specify which measures had to be adopted by city).].

The SEIR defers critical details on a number of mitigation measures. Without critical details, it is impossible to adequately determine if a Project actually adequately mitigates its environmental impact to a less than significant or to the extent feasible. These include, but are not limited to:

Noise Mitigation Measures MM. F.-1.2 which requires that construction operations be conducted "as far as possible from the nearest noise-sensitive land uses and that barriers shall be utilized "to the maximum extent possible" is impermissibly vague and unenforceable;

Noise Mitigation Measures MM. F.-1.3 which requires that the use of construction equipment or construction methods "with the greatest peak noise generation potential" shall be minimized "[t]o the maximum extent feasible" is also impermissibly vague and unenforceable;

Land Use Mitigation Measure IV.H-7 which requires that the Project "procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City Planning" is impermissibly vague, defers mitigation measures to a later date and unenforceable;

Public Utilities Mitigation Measure IV.H-4-1 which requires that the Project "develop a construction and demolition debris recycling program" defers mitigation measures to a later date and is unenforceable as it sets no performance standards for the recycling program;

Public Utilities Mitigation Measure IV.H-4-2 which requires that the Project "develop an operational project recycling plan" defers the development of a mitigation measure to a later date and is unenforceable as it sets no performance standards.

Public Services Mitigation Measure IV.J.1-2.1 which requires that the Project develop a Construction Traffic Control / Management Plan defers the development of a mitigation measure to a later date.

Public Services Mitigation Measure IV.J.1-3.2 which requires that the Project "develop and implement a security plan" defers the development of a mitigation measure to a later date.

Parking Mitigation Measure IV.K.2-1 which requires that the Project "develop a Construction Parking Plan" defers the development of a mitigation measure to a later date.

General Impact Categories Mitigation Measure IV.D-5 which requires that the Project "prepare and submit an emergency response plan" defers the development of a mitigation measure to a later date.

The aforementioned mitigation measures violate CEQA as they are vague and unlawfully defer the development of critical details to a later date with little to no performance standards.

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G. The Project Requires An Entirely New Environmental Impact Report Or A Subsequent Environmental Impact Report

A new environmental impact report rather than supplemental environmental review is required. By conducting supplemental environmental review, rather than an entirely new round of environmental review, the City is improperly limiting the scope of environmental analysis on this Project. A subsequent or supplement environmental impact report is required to analyze substantial changes to the project or circumstances around the project or new information that could not have been known at the time the original environmental impact report was certified. PRC § 21166.

Here, the totality of the circumstances demonstrate that the current Project is an entirely new project. Save Our Neighborhood v. Lishman (2006) 140 Cal. App. 4th 1288, 1301; see also Sierra Club v. County of Sonoma (1992) 6 Cal. App. 4th 1307, 1320 - 21. A prior court ruling invalidated the previous environmental impact report and approvals upon which this SEIR is tiered from.

Moreover, due to changes in the plans, circumstances and available information concerning the Project, the previous EIR for the Project lacks informational value, requiring an entirely new environmental impact report based upon current environmental conditions presuming the non-existence of the currently illegal structure. Friends of College of San Mateo Gardens v. San Mateo County Community College Dist. (2016) 1 Cal. 5th 937, 951.

The previous EIR for the Project lacks informational value as it has been more than 10 years since the certification of the last EIR. Moreover, the previous approvals for the Project have been vacated by the Court as they were based upon the preservation of the Old Spaghetti Factory facade rather than the rebuilding and restoration of it. *La Mirada Neighborhood Ass'n v. City of Los Angeles* 2015 Cal. App. Unpub LEXIS 6438 *3, 25.

H. The Project Will Have A Significant Impact On Land Use

By definition the Project's proposed General Plan Amendments, Vesting Zone and Height District Changes will have a significant impact on land use due to its inherent inconsistency with the City's General Plan and Hollywood Community Plan that requires the changes to the General Plan, zoning and height district.

IV. THE CITY FAILS TO COMPLY WITH THE CITY'S GENERAL PLAN, HOLLYWOOD SPECIFIC PLAN AND ITS OWN MUNICIPAL CODE

A. The Project's Proposed General Plan Amendment, Height & Zoning Changes and Vesting Tentative Tract Map Fail To Comply With The Hollywood Community Plan

The Hollywood Community Plan bars increases in density effectuated by zone changes or subdivisions, such as the project proposes, without adequate transportation infrastructure. In particular the Hollywood Community Plan requires that "[n]o increases in density shall be effected by zone changes or subdivision unless it is determined that the local streets, boulevard and avenues, freeways and public transportation available in the area of the property involved are adequate to serve the traffic generated. City of Los Angeles (1988) Hollywood Community Plan HO-4. The Project will have significant traffic impacts and violates the Hollywood Community Plan.

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In addition, the Hollywood Community Plan requires that the City prepare station area master plans prior to permitting higher intensity development, such as the Proposed Project, in the vicinity of Metro Rail stations. Hollywood Community Plan HO-3 – 4. The Project Site is a mere six blocks from the Hollywood and Vine Metro Rail Station, and therefore the City is barred from approving the Project Site's land use zoning designations to allow higher density without having adopted a master plan for the area surrounding (general plan amendment, vesting zone and height district, and vesting tentative tract map). No master plan has been adopted for the area surrounding the Hollywood / Vine Metro Rail Station.

B. The General Plan Amendment, By Effectively Spotzoning The Project Site and Granting Special Entitlements, Violates The City Charter

Section 555 of the City Charter allows amendments to the City's General Plan "by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity."

The Project's proposed general plan amendment to redesignate the portion of the Project Site located at 1528 – 1540 North Gordo Street (Lots Nos. 17, 18 and 19 of Bagnoli Tract No. 2) from High Medium Residential to Regional Center Commercial violated Section 555 of the City Charter as it is neither a geographic area of significant social, economic or physical identity.

C. The Tentative Tract Map Fails To Comply With The State Subdivision Map Act The Subdivision Map Act, Government Code section 66410, et seq. ("Subdivision Map Act" or "Act") requires local agencies to review and approve all land subdivisions. The Act regulates both the process for approving subdivisions and sets substantive requirements for approval of land subdivisions. The Act requires that a local agency deny approval of a land subdivision, referred to as a tentative map or a parcel map, if it makes a determination that "the proposed map is not consistent with applicable general and specific plans" or that "the design or improvements of the proposed subdivision is not consistent with the applicable general and specific plans." Cal. Gov. Code, § 66474(a–b).

For aforementioned reasons, the Project is inconsistent with the City's General Plan and Hollywood Community Plan. Approving the Project would violate the Subdivision Map Act, the City's own land use ordinances and municipal code as well as CEQA.

D. <u>Approval of a Conditional Use Permit To Allow The Sale of Alcoholic Beverages for On-Site Consumption at the Project violates LAMC 12.24.W.1</u>

Section 12.24.W.1 of the LAMC requires that the City find:

- (1) that the proposed use will not adversely affect the welfare of the pertinent community;
- (2) that the granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, including beer and wine, in the area of the City involved, giving consideration to applicable State laws and to the California Department of Alcoholic Beverage Control's guidelines for undue concentration; and also giving consideration to the number and proximity of

City of Los Angeles Department of Planning – Sunset and Gordon Mixed Use Project SEIR July 5, 2018 Page 12 of 13

these establishments within a one thousand foot radius of the site, the crime rate in the area (especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace and disorderly conduct), and whether revocation or nuisance proceeding have been initiated for any use in the area; and

(3) that the proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools, hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.

The City has failed to issue any of the required findings, engaged in any factfinding regarding the concentration of premises selling alcoholic beverages in the area surrounding the Project Site. The conditional use permit for this Project violates the LAMC.

V. COMMENTER REQUEST A STAY OF ALL PROJECT APPROVALS, INCLUDING ALL RELATED PROJECT APPROVALS, PENDING COMPLETION / EXHAUSTION OF ALL ADMINISTRATIVE REMEDIES INCLUDING AN APPEAL TO CITY COUNCIL.

CEQA requires that an appeal of any CEQA determination, including categorical exemptions be appealable to an elected decision-making body. CEQA requires public agencies to allow the public to appeal a CEQA determination to a public "agency's elected decision-making body." Pub. Res. § 21151(c). A CEQA determination and project approval is not "final" until the "final adjudicatory administrative decision." Hensler v. City of Glendale (1994) 8 Cal. 4th 1, 22. CEQA defines "project" broadly to mean "the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately ... [¶ [t]he term . . . refers to the activity which is being approved" Guidelines³, § 15378, subds. (a) and (c). The scheme proposed by the City, that CEQA only requires a perfunctory appeal regarding the sufficiency of an EIR to an elected decision-making body, defeats the entire point of an EIR, which requires an agency, and if available an agency's elected decision-makers, to "have a real confrontation with the EIR," to "face "the political heat of certifying an EIR," leaving them with "no alternative to taking arms against the troubles identified in the EIR," and to have a "real confrontation . . . with the economic and social values in the project." Vedanta Soc'y of So. Cal. v. Cal. Quartet (2000) 84 Cal. App. 4th 517, 527 – 529.

It is a well-established principle that "CEQA is violated when the authority to approve or disapprove the project is separated from the responsibility to complete the environmental review." POET, LLC v. State Air Resources Bd. (2013) 218 Cal. App. 4th 681, 734, and that an elected decision-making body "act[] as the final, independent decision-making body for both the Project and the environmental review documents." Citizens for the Restoration of L Street v. City of Fresno (2014) 229 Cal. App. 4th 340, 359 (emphasis added); Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal. App. 4th 1184, 1202 ("It is the City's bifurcated process, which resulted in segregation of environmental review from project approval, that supports an imputation of bad faith"). The City's

³ Known as the CEQA Guidelines, codified in Title 14 of the Cal. Code of Regulations.

City of Los Angeles Department of Planning – Sunset and Gordon Mixed Use Project SEIR July 5, 2018 Page 13 of 13

practice does exactly what POET and L Street disapprove of -- separating project approval from responsibility to complete the environmental review and allowing elected decision-making bodies to ignore the merits of the project ultimately being analyzed and considered for approval.

As POET noted, an EIR cannot be certified after a project had already been approved, as the City has done in declaring the Project Approvals final prior to completing the administrative appeals of the Project's EIR. POET, supra, 218 Cal. App. 4th at 730 ("The Executive Officer's adoption of the final regulation was improper because it violated the timing requirement of CEQA that "approval" occur after consideration of the environmental review documents."). Similarly, L Street independently found that an appeal that included only the sufficiency of an EIR failed to satisfy CEQA's mandates under PRC § 21177. L Street, supra, 229 Cal. App. 4th at 362 ("the administrative appeal, standing as a separate and independent procedure, did not comply with the CEQA requirement for findings by the decision-making body."). As such, the City's CEQA procedure allowing for appeal to an elected decision-making body is in violation of CEQA because it separates components of the project from the environmental review. See POET, supra, 218 Cal. App. 4th at 734.

VI. CONCLUSION

Coalition remains open to discussions concerning this Project. For the aforementioned reasons, Coalition requests that the City deny the Project or at a minimum order the revision and recirculation of the Project's environmental documentation.

Sincerely,

Mitchell M. Tsai

Attorneys for Coalition to Preserve LA

Attached:

Letter from RK Engineering Group, Inc. to Mitchell M. Tsai, Attorney At Law (June 19, 2018) (Exhibit A);

LADOT (2016) Transportation Impact Study Guidelines (Exhibit B);

City of Los Angeles (2006) LA CEQA Thresholds Guide: Your Resource for Preparing CEQA Analysis in Los Angeles (Exhibit C); and

Los Angles Housing and Community Investment Department (2015) Report Back Identifying Local Permanent Funding Sources for the City's Affordable Housing Trust Fund (AHTF) and Request To Fund A New Affordable Housing Benefit Fee Study (Exhibit D).



June 19, 2018

Mitchell Tsai MITCHELL M. TSAI, ATTORNEY AT LAW 155 South El Molino Avenue Suite 104 Pasadena, CA 91101

Subject:

Sunset and Gordon Mixed Use Project (5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street) EIR (Case No.: ENV 2015-1923-EIR) City of Los Angeles – Response to Final EIR Comments

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to submit this response to the Final EIR Response to Comments for the Sunset and Gordon Mixed Use Project (Case No.: ENV-2015-1923-EIR). RK provided extensive traffic and parking comments in our letter dated October 5, 2017.

The purpose of this review is to identify any additional traffic, circulation and parking issues not fully addressed in the EIR Response to comments as they may affect the adequacies of the study and the impacts to the AIDS Healthcare Foundation Facility. The Final EIR provided a Response to our comments which included additional traffic analysis and the preparation of a TDM (Transportation Demand Management Plan) which was not previously available in the DEIR. The TDM Plan has now been made a mitigation measure rather than a Design Feature and will require an on-going Mitigation Monitoring Program.

RESPONSE TO COMMENTS

There are still some outstanding issues with respect to transportation issues that need to be addressed before the EIR can be finalized. RK will address those issues based upon our original comments on the DEIR.

1. RK Comment - <u>Trip Distribution and Assignment of Project Traffic:</u> Figure 6 in the Traffic Impact Study shows the Project's peak hour trip distribution percentages at each study area intersection. Based on Figure 6, the Traffic Impact Analysis does not assign traffic to Vine Street or Argyle Street, north of Sunset Boulevard. These roadways are plausible alternative routes for traffic traveling to/from Hwy 101,

north of the site. There are also many retail/commercial land uses along this route that may draw project traffic. The Traffic Impact Analysis should assign traffic along Vine Street and Argyle Avenue, north of Sunset Boulevard and evaluate the impacts of the intersections and roadways.

Response to Comment – The FEIR response to comments did not feel that it was appropriate to assign project traffic north of Sunset Blvd. on Vine Street or Argyle, because the project was closer to the State Route 101 interchange at Hollywood Blvd. and because of possibly slower traffic on these alternative routes. According to the original traffic study approximately 15% of the project traffic is oriented north on State Route 101 and all of it was assign to the Hollywood Blvd. interchange. While it is true that the Hollywood Blvd. interchange is closer to the project than the other two interchanges, the actual travel distance north on State Route 101 to the Vine Street interchange is actually longer (10-20%) for vehicle desiring to travel north than the other interchanges. Also, there is a substantial amount of traffic congestion on the southbound off-ramp at Hollywood Blvd. heading towards the project as shown in the screenshots included in Appendix A. Therefore for project traffic heading south on the State Route 101 to the project, these alternative routes are plausible alternatives to what was studied in the original traffic study.

As a result of RK's comments a supplemental traffic analysis was performed in the FEIR/Response to Comments that did assume traffic would use these alternative routes to access the project site. It did conclude that with project mitigation (implementing a Transportation Demand Management Plan) the impacts at Vine Street at Sunset Blvd. could be adequately mitigated. If only of 2% of the 15% is allocated to this intersection. It is very likely that more than 2% of the project trips will occur at this intersection. The reason this is important is the intersection of Vine Street at Sunset Blvd. is projected to operate at a poor level of service (LOS = E) and if one (1) more project trip makes the southbound left turn at the intersection it would make the project have a significant impact even with the proposed TDM Plan.

Even with the Transportation Demand Management Plan. Given the fact that Vine Street is a viable alternative to accessing the project from the southbound State Route 101 some improvement to this failing intersection should be included as a project mitigation. Since it is very likely that more than 2% of the project will utilize the intersection of Vine Street and Sunset Blvd.

2. **RK Comment** – It did not appear that a queuing analysis was provided with respect to any proposed parking garage gates. It is not clear exactly where these gates are located and whether they would have an impact to the adjacent Gordon Street. A queuing analysis should be conducted to evaluate these conditions.



Response to Comment – As a result of RK's comments the supplemental traffic study in the FEIR/Response to Comments included an internal queuing analysis for the project. That analysis addressed the queuing for the separate entrances to the commercial gates and residential gate. It concluded that there is adequate storage available for both the commercial and residential areas of the project.

However, in reviewing the detailed site plan it appears that the queuing for the residential gates was to occur in a short left turn pocket located away from the actual residential gate. It is likely that residential vehicles will creep up towards the gate itself and block circulation leaving the project. This will also result in conflicts with the "Flex" parking spaces that will need to back into the main circulation aisle. Furthermore there is no means for vehicles who accidentally enter the left turn pocket to make a U-turn out of the site in the event they erroneously enter the building, because there is insufficient turn around space.

Finally how will guests enter the residential gated area? The queuing into the residential area would be much longer than assumed in the study and would cause additional queuing blocking the entrance to the site and back into Gordon Street. The time for non-residents to open the gate would be substantially longer. Therefore queuing of the project traffic onto Gordon will cause delays to through traffic on the street. Which will cause delays to existing traffic. How will this be addressed and what are the potential impacts to both on-site and off-site traffic?

3. RK Comment - The neighborhood traffic analysis only assumed impacts from the commercial portion of the project. This is not reasonable and the entire project (both commercial and residential components) should be evaluated with respect to neighborhood traffic impact. Realistically since this is a mixed use project, the entire project should be evaluated with respect to traffic impacts to neighborhood street impacts. This would include all neighborhood streets where the entire project will exceed the following thresholds:

Projected ADT with Project (Final ADT)	Project-Related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12 percent or more of final ADT
2,000 to 2,999	10 percent or more to final ADT
3,000 or more	8 percent or more of final ADT



Response to Comment – The response to comments states that the residential portion of the project does not need to be included in the neighborhood street system evaluation. In reviewing the latest LADOT Traffic Study Guidelines it only says that a project which has commercial needs to assess the neighborhood street system review, not necessarily just the commercial component of the mixed use project. For the Sunset and Gordon mixed use project the residential component of the mixed use project generates 62% of the projects daily traffic. None of these trips (a total of 1,789 trips per day) were included in the neighborhood street traffic evaluation.

Since CEQA requires a full evaluation of the project's impact to the surrounding community the entire number of trips generated by the project (commercial and residential) must be included in this analysis and if it is determined that the project causes a significant impact then mitigation measures should be identified to reduce or eliminate these impacts. RK updated the neighborhood traffic analysis in the attached Table 13b (Revised). When including the full project including the residential component significant unmitigated project impacts will occur at the nearby neighborhood streets.

CONCLUSIONS

RK Engineering Group, Inc. has review the FEIR and Response to Comments which addressed our previous comments. As noted above there are still several outstanding traffic issues that have not been fully addressed in the FEIR. These include the potential additional traffic impact from the project to the intersection of Vine Street at Sunset Blvd., the internal queuing within the project and the impacts of the project to the local neighborhood street system.

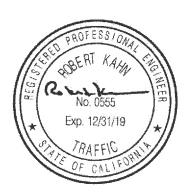
RK appreciates the opportunity to review this project for the Aids Healthcare foundation. If you have any questions about our review please give me a call at (949) 474-0809.

Sincerely,

Robert Kahn, P.E. Founding Principal

Registered Civil Engineer 20285 Registered Traffic Engineer 0555

cc: Mitchell M. Tsai, Attorney at Law



TABLES

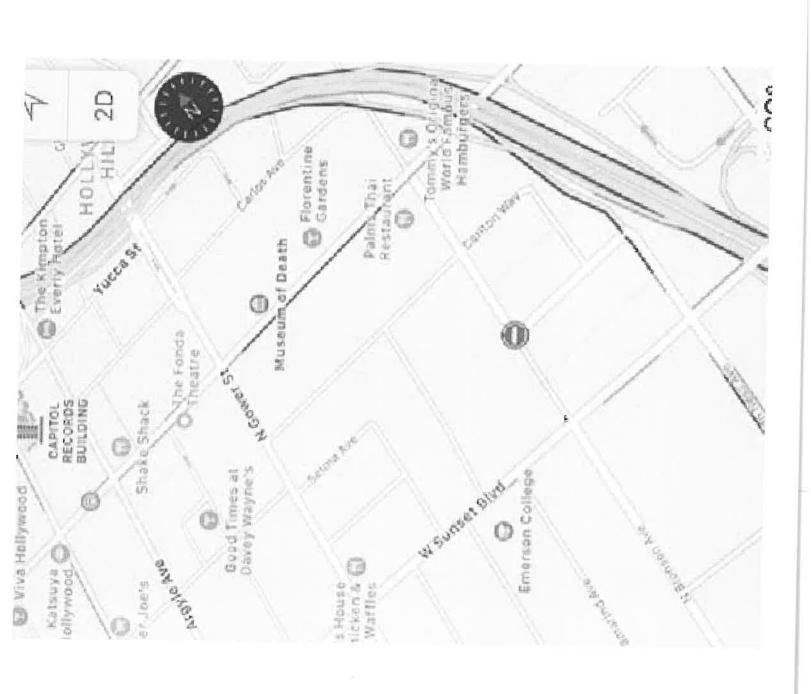
Table 13b (Revised) Street Segment Analysis Summary - With Residential Traffic Analysis Without Credit For Prior Uses

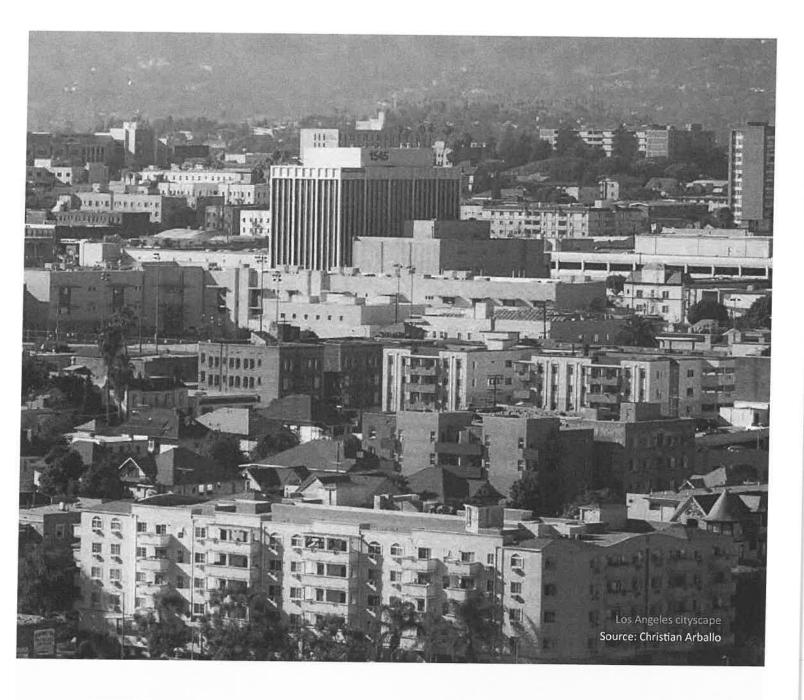
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stboound	930	0%	out	0	930			19	949	0%	out	0	948		
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ocation:	Carlton Way	west of B	ronson A	venue											
otal	1,818			356	2,174	16.4%	Yes	36	1,854			356	2,210	16.1%	Yes
Westbound	872	20%	out	285	1,157			17	889	20%	out	285	1,174		
astbound	946	5%	in	71	1,017			19	965	5%	in	71	1,036		
Direction		<u>%*</u>		Trips**	Total	Impact	Significant?	Ambient	<u> IDtal</u>	Project <u>%*</u>		Project Trips**	<u>Total</u>	% Impact	Significant?
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ocation:	Carlton Wa	y east of G	iower Str	eet											
Total	1,569			570	2,139	26.6%	Yes	31	1600			570	2,170	26.3%	Yes
Southbound	<u>859</u>	20%	in	285	1144			<u>17</u>	<u>876</u>	20%	in	285	1161		
Northbound	710	20%	out	285	995			14	724	20%	out	285	1,009		
Direction		% <u>*</u>		Project <u>Trips**</u>		% <u>Impact</u>	Significant?	Ambien	t <u>Total</u>	Projec <u>%*</u>	t	Project Trips**		% Impact	Significant
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Appendices

Appendix A

Screen Shot of Traffic Conditions at the State Route 101 Interchange at Hollywood Blvd.







Transportation Impact Study Guidelines

December 2016



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For comments or questions regarding the transportation study review policies and practice of the City of Los Angeles, please contact:

City of Los Angeles Department of Transportation Bureau of Planning & Development Services

Wes Pringle, P.E., Transportation Engineer, Metro Office Sergio Valdez, P.E., Transportation Engineer, Valley Office Eddie Guerrero, P.E., Transportation Engineer, West Los Angeles Office

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Attachment A: Development Review Fees

Attachment B: Standard Street Dimensions

Attachment C: Study Scoping MOU

Attachment D: Pass-By Trip Rates

Attachment E: Manual Traffic Count Summary

Attachment F: Bicycle and Pedestrian Count Forms

Attachment G: Level of Service Worksheet

Attachment H: Transportation Demand Management and Trip Reduction Measures Ordinance (LAMC 12.26-J)

Attachment I: Sample Physical Mitigation Drawing

Attachment J: Map of LADOT Development Review Office Boundaries

SECTION 1:

Overview of Process & Procedures

1.1 BACKGROUND

The City of Los Angeles Department of Transportation (LADOT) may require Applicants to analyze and evaluate Project-specific transportation impacts to comply with the California Environmental Quality Act (CEQA) and/or City regulations. This edition of the City of Los Angeles Transportation Impact Study (TIS) Guidelines replaces the Traffic Study Policies and Procedures, last updated in August 2014, to identify the criteria, guidelines, objectives, and standards to be used in the preparation of a TIS in the City of Los Angeles.

In 2013, when Governor Edmund G. Brown Jr. signed Senate Bill 743 into law, the Governor's Office of Planning and Research (OPR) was charged with developing new guidelines for evaluating transportation impacts under CEQA using methods that no longer focus on measuring automobile delay and level of service (LOS). Senate Bill 743 directs agencies to develop new guidelines that develop a transportation performance metric that can help promote: the reduction of greenhouse gas emissions, the development of multimodal networks, and a diversity of land uses. Thus, the City's TIS Guidelines are subject to revisions and updates upon the certification and adoption of OPR's recommended guidelines and criteria for determining transportation impacts by the Secretary of the California Natural Resources Agency. The City is in the process of updating its travel demand model and transportation impact thresholds based on vehicle miles traveled (VMT), so revision of these guidelines is imminent.

1.2 PURPOSE

At a time when safety, sustainability, smart growth, and the reduction of greenhouse gas emissions - in addition to traditional mobility considerations - are prime concerns for the City of Los Angeles, these TIS Guidelines support the City's goal of developing a

safe, accessible, well-maintained, and well-connected multimodal transportation network for all Angelenos. The TIS Guidelines have been developed to identify Projects that may have transportation impacts, to provide step-by-step guidance for assessing transportation impacts and preparing Transportation Studies, and to ensure consistency in site access design, on-site circulation planning, and off-site improvements for proposed land use Development Projects.

Project Applicants and consultants shall follow the procedures and standards set forth in this document when preparing and submitting a TIS to ensure a timely review by LADOT. However, note that TIS requirements may differ in certain areas of the City where specific plans or similar ordinances establish distinct guidelines. LADOT strongly recommends that the Project applicant and/or consultants communicate with LADOT staff early in the design of the Project to ensure that traffic access, circulation and safety issues are addressed, and to establish the scope and basic assumptions of the TIS. Applicable fees for the various submittals and reviews described in these TIS Guidelines are listed in the Los Angeles Municipal Code (LAMC) Section 19.15 (Planning and Zoning Code) (see Attachment A).

1.3 INITIAL STEPS

Upon receipt of an application for discretionary action, LADOT will prepare an initial assessment of the Development Project to determine if a Technical Memorandum or a TIS is required. A Development Project is defined as any proposed land use project that changes the use within an existing structure, creates an addition to an existing structure, or new construction, which includes any occupied floor area. For transportation infrastructure Projects for which a transportation analysis is required (e.g. lane reconfiguration, roadway improvement, transit project, etc.), refer to *Section 2.1B* of these guidelines for recommended transportation analysis methods.

The general parameters for determining the appropriate transportation impact review process for a Development Project are as follows:

- A Technical Memorandum is required when the Development Project is likely to add 25 to 42 a.m. or p.m. peak hour vehicle trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F. The scope of work of a Technical Memorandum, which is a significantly scaled-down version of a TIS, must be reviewed and approved by LADOT. If LADOT determines the preparation of a Technical Memorandum is required, the Project applicant or consultant should evaluate the potential impacts of the Development Project to intersections adjacent to the Project site at a minimum. The Technical Memorandum shall be prepared under the direction of, and signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering.
- A Transportation Impact Study (TIS), previously referred to as a Traffic Study, is required when the Development Project is likely to add 43 or more a.m. or p.m. peak hour vehicle trips. Transportation Studies aim to predict and analyze the circulation and congestion impacts generated by Development Projects and identify feasible mitigation measures to offset any impacts. The criteria, guidelines, objectives, and standards described herein shall be used by the public, private consultants, and City staff in the preparation and review of a TIS in Los Angeles. The preparation of a TIS must follow the guidelines, as described herein, and shall be prepared under the direction of, and signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering. Further, the Consultant hired by a Project Applicant to complete the TIS must have a valid Los Angeles City Business Tax Registration Certificate.

1.4 PROCESS

Any Project Applicant or their designated representative (e.g. transportation consultant) required to prepare a Transportation Impact Study (TIS) for a Development Project, shall follow the steps summarized in Figure 1 and described here. Steps applicable to Project Applicants preparing a Technical Memorandum are identified below.

Step 1 Contact LADOT with a request to prepare a new Technical Memorandum or TIS. During this initial communication, the following information shall be provided:

<u>I. Project Description</u> – Provide a general description of the proposed Project size (defined by square footage per use and/or number of dwelling units), uses, and heights of proposed new buildings and other structures to be remodeled and/or removed. Include information on any sequence of phased construction and any unusual conditions. Specify a building address, legal description and project title.

For Projects that require the preparation of an EIR, the transportation analysis should include Project alternatives. For such Projects, the LADOT assessment letter will be limited to summarizing the findings and requirements for the preferred Project alternative or the alternative that generates the most peak period trips. Should the Project applicant request separate assessments for each alternative, then additional review fees may be required.

II. Proposed Study Assumptions and Content —
The assumptions and content of the Technical
Memorandum or TIS shall be presented in accordance
with:

- a. California Environmental Quality Act (CEQA) guidelines,
- b. the Los Angeles County Congestion Management Program (CMP) (see **Section 2.5** for guidance),

- c. any applicable Transportation Specific Plan (TSP) and
- d. other applicable plans, laws, or ordinances (see *Section 2* for guidance).

III. Project Site Plan — Submit the proposed Project's site plan with driveway location(s), loading/unloading area, and parking scheme to help estimate the distribution of Project trips according to any necessary turn prohibitions at the proposed driveways. Projects should integrate existing alleys into the design of site access and circulation plans. Projects should avoid creating new driveways and consider reducing driveways on roadways within the High Injury Network or where protected bicycle lanes are planned. While existing alleys should be used primarily for vehicular access, loading, and service access, they can also serve as midblock paseos for pedestrians and bicyclists.

Project site access, circulation, and parking plans should be compliant with the transportation and public accommodation provisions of the Americans with Disabilities Act (ADA). Development proposals that are not able to meet their parking-code requirements and cannot provide accessible parking on-site may be required to install accessible on-street parking space(s) with the complimentary ADA access ramp(s). Additionally, the design of driveways requires approval by LADOT and the Bureau of Engineering. Please refer to the LADOT "Driveway Design" Guidelines for additional information.

Generally, final LADOT recommendation of driveway location(s) and parking scheme will be conducted at LADOT's Citywide One-Stop Counter, the Valley Development Review Office, or West Los Angeles Development Review Office (see *Section 5* for contact information) as a clearance on the Project's building permit. Traffic flow considerations must be designed and incorporated early into the building and parking layout plans. In order to minimize and prevent last

minute building design changes, Project applicants should contact LADOT for driveway width and internal circulation requirements before building or parking layout design.

Step 2 Consult with other affected agencies or adjacent jurisdictions (i.e., Caltrans, L.A. County Public Works, other cities, transit agencies, etc.) to ensure that all transportation-related concerns and issues that may result from the Project and may affect that agency are properly addressed in the TIS. If a TIS includes the evaluation of an intersection or intersections in a neighboring local jurisdiction, then the TIS standards and methodology and impact thresholds of that local jurisdiction should be used to assess a Project's impact on that intersection or intersections.

Step 3 Consult with the Bureau of Engineering and LADOT to determine any highway dedication and street improvement requirements, as well as requirements under the Americans with Disabilities Act (ADA) (see Attachment C). For streets that front the proposed Project, the Technical Memorandum or TIS should reference the Mobility Plan 2035 for street classifications, and for roadway and right-of-way standard dimensions.

Step 4 If the Project is expected to generate a significant number of regional trips, LADOT may require the TIS to use travel demand simulation modeling and predict potential regional Project impacts. The decision to require travel demand modeling shall be made by the Bureau Chief supervising the development review functions of LADOT. These studies will be subject to LADOT's model calibration and validation standards.

Step 5 Submit payment of necessary fees per LAMC Section 19.15 (see Attachment A). For a TIS, a scoping Memorandum of Understanding (MOU) must be executed (see Attachment D). The MOU describes the assumptions that shall be included in the TIS including study intersections, residential street segments and freeway

segments; freeway analysis screening filter; related projects; trip generation rates; ambient growth rate; trip distribution pattern and trip assignments; trip credits for existing active or previous land use; projected buildout year and study methodology.

Step 6 Collect traffic counts in accordance with standards and methods established in *Section 3.3C* and at LADOT's discretion.

Step 7 Inform LADOT on the progress made in completing the TIS. LADOT approval is required for any deviations from the assumptions described in the executed MOU or any other changes made in the analysis, before the final report is prepared.

Step 8 Submit the complete Technical Memorandum or TIS comprised of all components described in *Section* **3** of these guidelines and payment for required fees to initiate LADOT's review. The consultant shall also submit proof of possessing a valid Los Angeles City Business Tax Certificate.

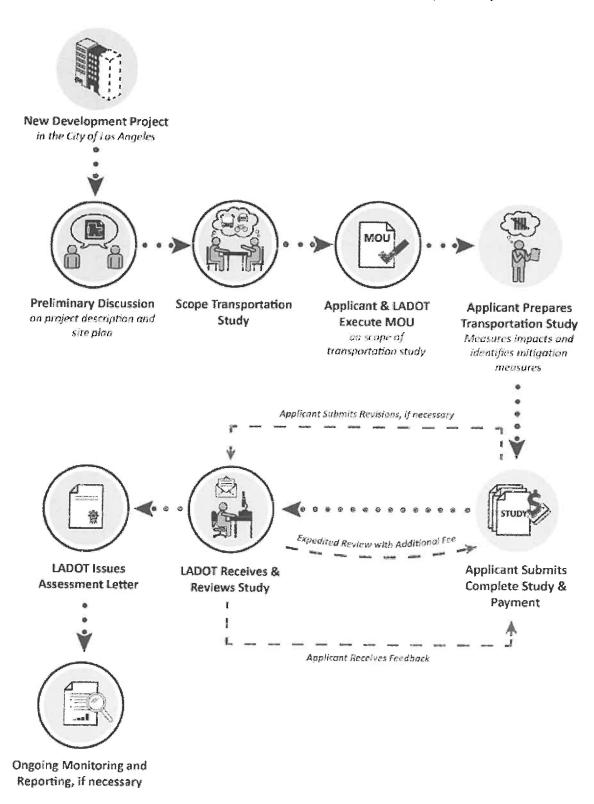
Step 9 After reviewing the submittal, LADOT will release a Project impact assessment report. LADOT will not release their Project impact assessment report until all necessary review fees are received and the complete and final electronic version of the Technical Memorandum or TIS in portable document format (PDF) has been submitted.

1.5 STUDY HIATUS AND INTERRUPTIONS

Occasionally, LADOT will review a TIS for a Project that is later modified. If LADOT determines that the description or scope of the Project has changed such that extensive and major revisions to the TIS are required, then LADOT shall consider the revised Project a new Project, which will require a new TIS and payment of the applicable review fees. If LADOT determines that revisions to the TIS can be accomplished without the preparation of a new TIS, then LADOT may require the preparation of a Technical Memorandum or supplemental analyses and payment of any necessary review fees.

Similarly, if, after LADOT has commented on a TIS, LADOT staff receives no further written communication from the Project Applicant or the Consultant on the status of the Project for one year or more, then LADOT will assume that the Project is no longer being pursued. To reinstate the Project after this time, a new TIS and traffic review fee will be required and the environmental processing "clock" shall start again.

Figure 1: Overall Review Process for Transportation Impact Study



SECTION 2:

Identifying Transportation Impacts

The City of Los Angeles's current policies and procedures for determining a Project's transportation impacts begins with an application for a discretionary action including, but not limited to, a master development plan, planned development, conditional use permit, variance, hillside development permit, design review, and/or a request to alter the assessor's map. This section describes different transportation analyses the City may require as part of a TIS to ensure the proposed Project is consistent with State environmental requirements and local policies.

2.1 LEVEL OF SERVICE (LOS) ANALYSIS

Currently, LADOT describes the performance of the City's transportation system using Level of Service (LOS). LOS is a performance measure that considers multiple roadway characteristics such as travel speed, travel time and flow interruptions and describes the quality of vehicular traffic flow. LOS ranges from "A" to "F" with LOS "A" representing excellent, free flow conditions and LOS "F" representing jammed, forced flow conditions. Table 1 provides a description of the different LOS measures and associated Volume/Capacity (V/C) ratios, which are measured on a scale of 0.000 to 1.000.

2.1A DEVELOPMENT PROJECTS

To assess the transportation impacts of proposed Development Projects, the Transportation Research Board, Circular 212 Critical Movement Analysis (CMA) Planning Method shall be used to analyze traffic operating conditions at study intersection(s). CMA is a method that determines the volume to capacity (V/C) ratio on a critical lane basis and the LOS associated with each V/C ratio at a signalized intersection. When determining which intersections should be included in the impact analysis for Development Projects, only signalized intersections should be selected.

Unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device(s), but will not be included in the impact analysis. When choosing which unsignalized intersections will be reviewed, intersections that are adjacent to the Project or that are expected to be integral to the Project's site access and circulation plan should be identified. For these intersections, the overall intersection delay should be measured pursuant to procedures accepted by LADOT during the scoping process. Based on the estimated delay, if the resultant LOS is E or F in the "Future with Project" scenario, then the intersection should be evaluated for the potential installation of a new traffic signal. The study shall include a traffic signal warrant analysis prepared pursuant to Section 353 of LADOT's Manual of Policies and Procedures and submitted to LADOT for review and approval.

2.1B INFRASTRUCTURE PROJECTS

To assess the transportation impacts of proposed transportation infrastructure Projects, including transit, rail, bicycle, and other roadway improvements, Transportation Studies should use the Highway Capacity Manual's (HCM) delay-based methodology for signalized intersections. In such cases, micro-simulation may also be necessary to fully understand the effects of the Project in terms of queue lengths, traffic signal timing parameters, transit travel times, etc. **Table 1** provides a description of the different LOS performance measures and associated delays in terms of "delay per vehicle."

Table 1: Level of Service Definitions for Signalized Intersections¹

LEVEL OF SERVICE	VOLUME/ CAPACITY RATIO	DELAY PER VEHICLE (Sec/Vehicle)	DEFINITION
А	0.000 - 0,600	≤ 10	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
В	0.601 - 0.700	> 10 - 20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
С	0.701 - 0.800	> 20 - 35	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	> 35 – 55	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.
Е	0,901 - 1,000	> 55 – 80	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	> 80	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

2.2 SIGNIFICANT IMPACT THRESHOLDS

The thresholds contained herein determine a Development Project's expected level of impact on the transportation system and determine the need for mitigation. The "Final V/C Ratio" shall define the future V/C ratio at a study intersection considering impacts with Development Project, and ambient and related Project growth without proposed transportation impact mitigation. "Project-Related Increase in V/C" shall be calculated as the change in V/C between the future V/C ratio with Project, ambient and related project growth without proposed traffic mitigation, and the future V/C ratio with ambient and related project growth without Project and proposed traffic mitigation. A transportation impact at a signalized intersection shall be deemed "significant" in accordance with Table 2, except as otherwise specified in a TSP, ICO, or CMP.

Table 2: Significant Transportation Impact Thresholds for Development Projects

LEVEL OF SERVICE	FINAL V/C RATIO	PROJECT-RELATED INCREASE IN V/C
С	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
Е	> 0.901-1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

Sources: Transportation Research Board, <u>Interim Materials on Highway Capacity</u>, <u>Transportation</u> Research Circular No. 212, January 1980; and Transportation Research Board, <u>Highway Capacity Manual 2010</u>.

For transportation impact analysis purposes, the "Final Delay" shall mean the future delay per vehicle at an intersection considering impacts with Project, ambient and related Project growth but without proposed traffic mitigation. "Project-Related Increase in Delay" shall mean the change in delay between the future delay with Project, ambient and related project growth without proposed traffic mitigation, and the future delay with ambient and related project growth without Project and proposed traffic mitigation. When using the HCM method for signalized intersections to assess transportation infrastructure Projects, a transportation impact shall be deemed "significant" in accordance with Table 3.

Table 3: Significant Transportation Impact Thresholds for Transportation Infrastructure Projects

LEVEL OF SERVICE	FINAL V/C RATIO	PROJECT-RELATED INCREASE IN V/C
С	> 20 - 35	equal to or greater than 6.0 seconds
D	> 35 – 55	equal to or greater than 4.0 seconds
E	> 55 – 80	equal to or greater than 2.5 seconds
F	> 80	equal to or greater than 2.5 seconds

2.3 RESIDENTIAL STREET IMPACT ANALYSIS

Commercial Development Projects may be required to conduct Residential Street Impact Analysis. The objective of the Residential Street Impact Analysis is to determine potential increases in average daily traffic associated with cut-through traffic that can result from a Project and impact residential streets. Cut-through trips are measured as vehicles that bypass a congested arterial street or intersection to instead travel along a residential street. To address these potential impacts, non-restrictive traffic calming measures should be considered and, if deemed warranted, implemented to off-set any anticipated impacts. Restrictive traffic calming measures should not be considered. See *Section 4* of these guidelines for a description of restrictive and non-restrictive traffic calming measures.

When selecting residential street segments for analysis during the traffic study scoping process, all of the following conditions must be present:

- the proposed project is a non-residential development and not a school,
- the arterial is sufficiently congested, such that motorists traveling on the arterial may opt to divert to a parallel route through a residential street; the congestion level of the arterial can be determined based on the estimated LOS under project conditions of the study intersection(s); LOS E and F are considered to represent congested conditions,
- the Project is projected to add a significant amount of traffic to the congested arterial that can potentially shift to
 an alternative route; Project traffic would need to exceed the daily minimum significance thresholds listed below
 under "Project-Related Increase in ADT," and
- the local residential street(s) provides motorists with a viable alternative route.

A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes as shown in **Table 4**.

Table 4: Significant Residential Street Impact Thresholds

PROJECTED ADT WITH PROJECT (FINAL ADT)	PROJECT-RELATED INCREASE IN ADT
0 to 999	120 or more
1,000 to 1,999	12 percent or more of final ADT
2,000 or 2,999	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT

2.4 FUTURE PERFORMANCE MEASURES

The LOS measure calculated by the CMA and HCM methods, respectively, focuses on the performance of transportation facilities for vehicular travel. To help achieve the City's vision of developing a robust multimodal transportation network and encouraging sustainable modes of travel, LADOT is currently evaluating other performance measures that can better analyze Project impacts on non-vehicular modes of travel. Updating the measures LADOT uses to identify Project impacts can provide useful information regarding the ability of a Project or a mitigation measure to reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions and to promote sustainable modes of travel.

The LOS performance measure cannot quantify the measurable reduction in VMT or GHG emissions of some mitigation measures, thus limiting the number of transportation impact mitigation measures that may be considered. In the case that mitigation measures with potential VMT or GHG reduction benefits are proposed, the TIS should include a description of the proposed improvements and the anticipated benefits to air quality. Additionally, traffic volume counts collected at the study intersections should include the volumes of pedestrians and bicycles that enter the intersection. These are helpful parameters and provide the necessary context when evaluating the overall operation of each intersection.

2.5 CONGESTION MANAGEMENT PROGRAM (CMP) TRANSPORTATION IMPACT ANALYSIS

The 2010 Congestion Management Program (CMP) for Los Angeles County includes the "Guidelines for CMP Transportation Impact Analysis" (Appendix "D" of the 2010 CMP) intended to assist local agencies in evaluating impacts of Development Projects on the CMP system through the preparation of a regional transportation impact analysis (TIA). A CMP TIA is necessary for all Projects required to prepare an Environmental Assessment based on local determination. The geographic area examined in the TIA must include, at a minimum, the following:

- All CMP arterial monitoring intersections, including freeway on and off-ramp intersections, where a proposed
 project is expected to add 50 or more trips during either the weekday a.m. or p.m. peak hours (of adjacent street
 traffic).
- Mainline freeway monitoring locations where a project is expected to add 150 or more trips, in either direction, during either the weekday a.m. or p.m. peak hours.

Based on these criteria, if the TIA does not identify any impacted regional facilities, then further CMP traffic analysis is not required. However, Projects must still consider transit impacts (also per the 2010 CMP). For further information on the CMP TIA process, visit the Metro CMP website (https://www.metro.net/projects/congestion_mgmt_pgm/) or contact Stacy Alameida at (213) 922-7414 or alameidas@metro.net.

2.6 FREEWAY IMPACT ANALYSIS SCREENING CRITERIA

Pursuant to the Freeway Agreement between LADOT and the California Department of Transportation (Caltrans) District 7, executed in October 2013 and updated in December 2015, Project applicants may be required to conduct a focused freeway impact analysis in addition to the CMP TIA described in *Section 2.5*. Since the Freeway Agreement is about to expire, to better align with the State's multimodal transportation and environmental action goals, Caltrans is pursuing vehicle miles traveled (VMT) as the metric of Project impacts.

Until further revision of these guidelines; however, all Projects for which a TIS is required shall conduct a freeway impact screening analysis. The screening analysis should be submitted to LADOT along with the Study MOU and should include the Project's trip generation and distribution estimates. Based on these estimates, the screening analysis shall also include a morning and afternoon peak hour Project trip assignment to determine the amount of Project traffic expected to be assigned to the freeway system. The freeway impact screening analysis shall investigate whether the Project meets any of the following screening criteria:

- The Project's peak hour trips would result in a 1% or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2% or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a 1% or more increase to the capacity of a freeway off-ramp operating at LOS E or F (based on an assumed ramp capacity of 850 vehicles per hour per lane); or
- The project's peak hour trips would result in a 2% or more increase to the capacity of a freeway off-ramp operating at LOS D (based on an assumed ramp capacity of 850 vehicles per hour per lane).

If the proposed Project meets any of the screening criteria, the Applicant will be directed to Caltrans Intergovernmental Review (IGR) for a determination on the need for analysis beyond the CMP TIA and, if necessary, the methodology to be utilized for a freeway impact analysis. To assist in the evaluation of impacts on State facilities, the Project's transportation consultant should refer to Caltrans' "Guide for the Preparation of Traffic Impact Studies" found at the following web link: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

SECTION 3:

Study Preparation

Each Transportation Impact Study (TIS) should follow a consistent format and organization and include all of the figures, maps, and information presented in this section. The appropriate level of detail required for each Project's transportation impact analysis with respect to specific issues should be determined during the scoping process and identified in the MOU. When this version of the TIS Guidelines is referenced in a TIS report, LADOT suggests using "2016 LADOT Transportation Impact Study Guidelines" to properly identify this reference.

3.1 PROJECT DESCRIPTION

All TIS reports shall include a detailed project description at the beginning of the document. The project description should include the following information:

- Project case number, as assigned by the Department of City Planning (if applicable)
- Location of the Project site, address, Assessor's Block and Lot number(s), cross streets, and City Council District
- Existing and proposed total square footage for each type of land use and the number of units for residential, hotel/ motel, and live/work projects including the net changes for each type of use
- Existing and proposed type and number of parking spaces
- This section shall also include the following maps and figures:
 - » Project site plan showing driveway locations, loading/unloading area, and any proposed highway dedication
 - » Site map showing study intersections and distance of the Project driveway(s) from the adjacent intersections. Include location and identification of all major buildings, driveways, parking areas and loading docks of the Project

3.2 PROJECT CONTEXT

The information on the locale and surroundings of the Project shall be discussed following the Project description as a different section of the TIS report. This section will provide a brief but comprehensive description of the existing transportation infrastructure and conditions in the vicinity of the Project. Normally, the Project vicinity is defined as a ¼-mile radius around the Project site; however, a larger area may be required during the scoping process. The specific boundaries of the TIS area, for both the locale and Project impact analysis, should be confirmed during the initial discussion and scoping process with LADOT. The boundaries of the TIS area are subject to LADOT revision after initial impact analysis.

The Project context section should include the following information, with the level of detail to be directed by LADOT during the scoping process:

 Street designations, classifications, and modal priorities as identified in the Mobility Plan 2035, the Transportation Element of the Los Angeles General Plan. This street information can be found on the following maps in the Transportation Element of the General Plan: Citywide General Plan Circulation System; Transit Enhanced Network; Neighborhood Enhanced Network; Bicycle Enhanced Network; Bicycle Lane Network; Vehicle Enhanced Network; Pedestrian Analysis; and Goods Movement.

- Description of the TIS area streets, including the number and width of lanes, direction of flow, and the presence
 of peak period tow-away lanes affecting roadway travel capacity, the presence of bicycle lanes, and any other
 significant street information.
- Location of, distance from, and routings to and from on-ramps and off-ramps of regional highways and freeways.
- Description of public transit routes operating on the streets within the TIS area, including hours of service, peak
 period headways, type of vehicle (diesel coach, trolleybus, light rail vehicle, etc.), and service provider.

This section of a Technical Memorandum and TIS will also include the following maps and figures:

- Area map showing location of proposed Project and related projects
- Street maps of the study area indicating street names, classifications, modal priorities
- Table indicating location, size, name, description, and trip generation of each related project

3.3 ANALYSIS AND DISCUSSION

Following the descriptions of the Project and its surroundings, the TIS report shall contain a section that details the analyses conducted, summarizes the results, and identifies any impacts and mitigation measures.

3.3A TRIP GENERATION ANALYSIS

The latest edition of the Institute of Transportation Engineer's (ITE) Trip Generation Handbook for trip generation rates and formulas should be used to estimate the Project's trip generation. However, if the Project is in a Transportation Specific Plan (TSP) area, then the procedures and trip rates identified in the TSP should be applied. If other rates are proposed, then these rates must first be submitted with the appropriate background survey data for approval by LADOT. A table presenting the estimated number of daily trips and a.m. and p.m. peak-hour trips generated by the proposed Project entering and exiting the site must be included.

3.3B ADJUSTMENTS TO TRIP GENERATION RATES

Any trip generation rate adjustments must be approved by LADOT during the scoping process and those trips must be included in existing base year traffic counts. The following adjustments may apply to some Projects:

Unique Developments

Unique types of development may require trip generation studies of similar facilities in order to establish a trip rate for use in the impact analysis. These developments may include land uses for which trip generation rates are not available in the ITE Trip Generation Handbook, or land uses for which the rates in the ITE Trip Generation Handbook are based on a small sample of surveyed sites. The procedures and the results of the trip generation studies must be approved by LADOT.

Existing Use

When estimating the Project's net new trips, any claim for trip credits for an "existing" active land use requires that the "existing" use is/was in place at the time of the base year traffic counts. Generally, for CEQA purposes this means the "existing" use must have been active for at least 6 months during the past 2 years. To fully ensure that "existing use" trip credit claims are validated by LADOT, supporting documentation (leasing agreements, utility bills, etc.) must be submitted. Documentation of any previous environmental review of the circulation impacts of the "existing" use should be included in this submittal. Note that some TSP ordinances allow different time frames for the determination of existing use trip credits and of any applicable trip fees.

Terminated Land-Use

Any claim for trip credits for a previously terminated land use must be supported with appropriate documentation of the previous active use, such as copies of any building permit, certificate of occupancy, business license, lease agreement, affidavits, or photographs as well as documentation as to when the previous land use was terminated. Documentation of any previous environmental review of the circulation impacts of the terminated land use should also be submitted in support of such claims. The absence of documentation of previous environmental review may result in denial of the claim for trip credits.

Pass-by Trips

Any claim for "pass-by" trip generation adjustments must use the trip rates summarized in **Attachment F** titled "Pass-By Trip Rates," which are based on rates published by ITE. However, these rates may be superseded by additional guidelines provided in specific plans or interim control ordinances. Pass-by trip generation adjustments shall not be used in determining the need for a Transportation Impact Study.

• Transit-friendly Projects

LADOT encourages Project applicants to design and construct transit-friendly Projects that create safe and walkable site design and facilities that connect Project patrons to and from transit stations and stops. Consistent with City policy goals to promote the use of transit and walking, LADOT, at its discretion, may allow up to a 25% transit/walk trip generation reduction, subject to the following guidelines, on a case by case basis:

- Developments above or adjacent to a Metro Rail, Metrolink, or Orange Line station, or to a similar dedicated transit line station with convenient pedestrian access to the station may qualify for a maximum 25% trip generation adjustment. The actual adjustment provided should be determined by an analysis of the transit service frequency and density at the specified transit station.
- Developments within a 1/4-mile walking distance of a transit station, or of a RapidBus stop, may qualify for up to a 15% trip generation adjustment. The actual adjustment provided will be determined by an analysis of the transit service frequency and density at the specified transit station or RapidBus stop.
- To obtain the maximum trip generation adjustment, Development Projects should include the following improvements listed in priority order:
 - » Provide a wider than standard sidewalk along the streets fronting the Project through additional sidewalk easement or by dedicating additional right-of-way beyond street standards.
 - » Improve the condition and/or aesthetics of existing sidewalks leading to transit station(s) with adequate lighting and safety improvements to provide for a safer pedestrian environment.

- » Provide continuous paved sidewalks / walkways with adequate lighting from all buildings in the Project to nearby transit services and stops. This may include mid-block paseos.
- » Implement transit shelter enhancements.
- If the Development Project is not within ¼-mile walking distance of a transit station or a RapidBus stop, the Project may still qualify for up to 10% trip generation adjustment. To be eligible for this adjustment, the Project should include design features that promote alternative travel modes and provide certain amenities to tenants and employees. Features and amenities that may qualify a Project for this adjustment include the following:
 - » An on-site transit information klosk and/or on-site transit pass sales;
 - » On-site facilities such as ATM machines, cafeteria, convenience shopping, showers, and changing rooms;
 - » Pricing for single-occupancy auto parking;
 - » Publicly accessible car share or bike share station, contingent on LADOT approval;
 - » Bicycle racks or amenities for people traveling by bicycle;
 - » Provision of on-site concierge service to facilitate use of transit, taxis, or private shuttles by employees/ residents;
 - » Provision of shuttle service for employees and/or customers.

Transit trip adjustment will not be automatically granted to Development Projects located in an area with infrequent transit service. However, all reasonable efforts by the developer to promote the use of public transit or walking will be considered for transit adjustments on a case-by-case basis.

NOTE: Refer to Section 4.2 of these TIS Guidelines for transit-related impact mitigation measures.

Affordable Housing Projects

Residential or mixed-use developments that include Affordable Housing Units [as defined in LAMC 12.22-A.25 (b)] are eligible to use the trip generation rates presented in **Table 5**, which are based on the total number and type of dwelling units reserved as affordable. These trip generation rates are based on vehicle trip count data collected at affordable housing sites in the City of Los Angeles in 2016. These trip generation rates for Affordable Housing units are not subject to any of the aforementioned adjustments in this Section.

Table 5: Trip Generation Rates for Affordable Housing Projects

Affordable Housing Type	Daily Rate (Trips per DU)	Average AM Peak Hr Rate (Trips per DU)	% AM Trips In	% AM Trips Out	Average PM Peak Hr Rate (Trips per DU)	% PM Trips In	% PM Trips Out
Family	4.08	0.50	40%	60%	0.34	55%	45%
Seniors	1.72	0.12	38%	62%	0.15	52%	48%
Permanent Supportive Housing / Special Needs	1.27	0.12	44%	56%	0.12	59%	41%

Family affordable housing offers affordable dwelling units designed for households with children. Senior affordable

housing provides affordable dwelling units designed for mature residents. Permanent supportive housing provides long-term housing with supportive services designed to enable homeless persons and individuals/families at risk of homelessness to ensure that they remain housed and live as independently as possible.

3.3C TRAFFIC COUNTS

The LADOT traffic count database should be searched for any recent traffic counts at the Study intersections. The TIS should not use any traffic counts that are more than two years old. If recent LADOT traffic counts are not available, then new traffic counts shall be collected by a qualified data collection firm. Turning movement data at the study intersections should be collected in 15-minute intervals during the hours of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m., unless LADOT specifies other hours (e.g., for a signal warrant determination or weekend analysis). Unless otherwise required, all traffic counts should generally be conducted when local schools or colleges are in session, on days of good weather, on Tuesdays through Thursdays during non-Summer months, and should avoid being taken on weeks with a holiday. Relative to the proposed Project description, the TIS may be required to collect traffic data on and evaluate special circumstances, such as:

- Summer weekend activity in recreational areas
- · Holidays or special events
- Alternative Project scenarios if required by another City Department or adjacent jurisdiction

Traffic counts should include vehicle classifications, pedestrian volume counts, and bicycle counts. If traffic count data is collected utilizing video technology equipment that is left unattended in the public right-of-way, the video equipment should be clearly labeled as traffic counting equipment and should include the name and contact information of the company conducting the count, as shown in **Figure 2**. All traffic data collected should be summarized and presented in the standard LADOT format depicting turning movement volumes for all required modes as shown in **Attachments G** and **H**, and submitted in digital and hard copy formats.

The TIS should include map(s) showing the "existing" (specify base year) traffic volumes for both the a.m. and p.m. peak hours at the study intersections and the average daily traffic (ADT) on any analyzed street segments. Additionally, the TIS should include map(s) showing future traffic volumes with ambient growth without Project at the Study intersections and street segments. This map should specify the future year used in the impact analysis and should be based on the expected date of project buildout. The future year identified in this step shall remain consistent for all other analyses and maps used to illustrate future traffic projections.

Figure 2: Sample Label for Traffic Counting Equipment

TRAFFIC COUNTING EQUIPMENT

For Information Contact

(xxx) xxx-xxxx (Company Name)

3.3D TRIP DISTRIBUTION

The TIS must include map(s) showing Project trip distribution percentages (inbound and outbound) at the study intersections, freeway locations and project driveway(s). This map must be pre-approved by LADOT and included in the scoping MOU.

3.3E RELATED PROJECTS LIST

The TIS must consider proposed Projects and associated trip generation within the vicinity of the Project site. The Study must include map(s) showing traffic generated by the related projects only. Use a separate map for similar land uses (e.g. retail, office, residential, industrial/manufacturing) with similar trip distribution patterns (as they affect the study intersections and freeway locations). Consultation with the Department of City Planning and LADOT may be required to compile the related projects list.

3.3F SELECTED HORIZON YEAR AND AMBIENT GROWTH RATE

The TIS must estimate ambient traffic at the Development Project site for the horizon year selected during the scoping phase and recorded in the executed MOU. The Study must clearly identify the horizon year and annual ambient growth rate used for the Study. The horizon year should align with the Development Project's expected completion year. For Development Projects constructed over several years, the TIS should analyze intermediary milestones before the buildout and completion of the Project. The annual ambient growth rate shall be determined by LADOT staff during the scoping process and will be based on an adopted TSP, Metro CMP guidance, or most recent SCAG regional transportation model, as applicable.

3.3G TRANSPORTATION ANALYSIS

The TIS should include calculations, data, and descriptions of any transportation analyses conducted to determine Project impacts on the transportation system. During the scoping process, LADOT staff will determine which of the transportation analyses listed in Section 2 of these TIS Guidelines or other methods of assessment are required.

To assist the evaluation of Development Projects, LADOT has developed a CMA spreadsheet in MS-Excel format to estimate the LOS for study intersections. All Transportation Studies that require the use of CMA to estimate impacts should be prepared using this spreadsheet. Completed LOS calculations must be submitted to LADOT in digital format and included with the submittal of the TIS. A typical sample of a LOS calculation worksheet is shown in **Attachment I**. A digital copy of the spreadsheet will be provided to firms preparing Transportation Studies in the City of Los Angeles. Contact any of the LADOT offices identified in Section L for a copy of the LOS spreadsheet. For some intersections (such as a 5-legged intersection, diamond interchange, etc.), the V/C ratio may need to be calculated manually or may need to be adjusted accordingly. The methodology utilized for these special cases should be discussed with the appropriate LADOT staff during the MOU scoping process.

The intersection capacity at intersections along a congested corridor may need to be adjusted to account for reduced capacity due to gridlock, heavy pedestrian volumes, or other prevailing factors. The LOS spreadsheet developed by LADOT allows users to override the standard CMA capacities to account for these factors. However, any such revisions to the standard capacities or to any formula or function used in the LOS spreadsheet require LADOT approval.

3.3H RESULTS & IMPACTS

The TIS should describe the results of all Project scenarios and identify impacts for all Projects. When a LOS analysis

is conducted, V/C ratios at Study intersections should be calculated to three decimals, rounded and summarized in a table showing weekday a.m. and p.m. peak hour LOS at study intersections for existing conditions, existing with Project, future without Project, future with Project and future with Project plus mitigation. In a separate appendix, the TIS shall include the detailed LOS worksheets for each study intersection. The results of the impact analysis shall be summarized and presented as shown in **Table 6**, in which the "cumulative base" scenario represents existing traffic conditions plus increases in traffic related to ambient growth and related projects and the "project" scenario is equal to the cumulative base scenario plus the Project trips.

(Year) Existing Traffic Conditions	Existing Plus Project	Project Impact	(Buildout Year) Cumulative Base	(Buildout Year) Project	Project Impact	(Buildout Year) Project with Traffic Mitigation	Net Project Impact
V/C LOS	V/C LOS		V/C LOS	V/C LOS		V/C LOS	

Table 6: Project Impact Summary Table Format

The TIS should also include a map or table that illustrates the lane configurations and lane volumes for each study intersection. Also, any programmed and funded transportation improvements that are expected to be implemented on or before the project buildout year should be identified in the study. Should these programmed improvements include a modification to the existing lane configuration to any of the study intersections, then the study should identify these changes and include the revised lane configuration in the V/C calculations for all future scenarios.

In determining the lane assignments for an intersection with an unmarked curb lane, the V/C calculations may assume the capacity of a functional right-turn only lane, provided that the lane width is a minimum of 18 feet wide, there are no bus stops at the approach, on-street parking would not impede vehicles turning right, the pedestrian volumes are low during the peak hour, and this de-facto right-turn operation has been verified in the field. Should the TIS include an analysis of freeway segments, then consultation with Caltrans is needed on the capacity analysis methodology used to evaluate state facilities.

3.4 ALIGNMENT WITH VISION ZERO

Directed by Mayor Eric Garcetti's Vision Zero Los Angeles initiative, the City is committed to creating safer streets for our most vulnerable road users, including children, older adults, and people walking and bicycling. All proposed Projects in the City must be designed to prioritize the safety of people walking, bicycling, rolling, taking transit to improve their connectivity. The City aims to eliminate all traffic-related deaths by the year 2025. To focus the implementation of safety countermeasures, LADOT conducted a citywide traffic collision analysis and identified a network of streets known as the High Injury Network (HIN), which consists of streets where high incidences of collisions involving vulnerable road users have resulted in severe injuries and deaths. Projects proposed on a roadway within the HIN should be designed to enhance safety.

During the preparation of the TIS, the Applicant or designated representative must consult with LADOT to identify treatments that may enhance safety at the Project site. Treatments that have proven to enhance the safety of vulnerable road users and/or lower vehicle speeds include, but are not be limited to, curb extensions, leading

pedestrian intervals, controlled mid-block crosswalks, pedestrian refuge islands, protected bicycle lanes, bike boxes, exclusive bicycle signal phases, protected left-turn lanes, etc. Additionally, site access plans for proposed Projects on roadways identified within the HIN should avoid or minimize the number of proposed driveways on that street. To determine whether a Project is on the HIN, visit the interactive map on www.navigatela.lacity.org and/or download the street dataset available on the City's Vision Zero website (www.visionzero.lacity.org).

3.5 TRANSPORTATION MITIGATION MEASURES

When a Project is expected to result in significant traffic impacts, as defined in **Sections 2.2 and 2.3**, the Project's consultant should meet with LADOT to discuss potential transportation mitigation options before submitting a TIS. Different transportation mitigation solutions should be explored when attempting to mitigate a Project's significant transportation impact to a level of insignificance.

In addition to traditional traffic flow considerations, mitigation programs must primarily aim to minimize the demand for trips by single-occupancy vehicles through transportation demand management (TDM) strategies. A preliminary draft performance-based TDM Program, prepared as outlined in Section 4 of these TIS Guidelines, must be included in the TIS for any Project seeking trip generation amendments supported by TDM. If the TDM Program is acceptable to LADOT, the applicant will be allowed to reduce the total Project trips by an amount determined to be commensurate with the measures proposed in the TDM Program. For additional information on TDM and other mitigation measures, refer to Section 4 of these guidelines.

The adequacy and feasibility of each mitigation measure must be determined to the satisfaction of LADOT. The final required mitigation measures for the Project will be determined by the appropriate decision maker (e.g., the City Planning Commission, the City Council). All proposed mitigation measures shall comply with the following requirements:

3.5A PLAN PREPARATION FOR PHYSICAL MITIGATION

a. Existing Conditions

- Prepare preliminary geometric design drawing to a scale 1" = 40' for each of the significantly impacted intersections for existing conditions, where lane reconfigurations are a proposed mitigation measure.
 Conduct field investigations and illustrate all important roadway details, including adjacent land use(s), parking restrictions, sidewalks, driveways, lane dimensions, roadway striping, curb and right-of-way lines, and "footprints" of building line on the plan.
- Use existing LADOT drawings where available and field check for accuracy to reflect current conditions.
- Provide copy of current City Bureau of Engineering District Map illustrating public rights-of-way on impacted streets.

b. **Euture Conditions with Mitigation**

- Prepare preliminary geometric design drawing to a scale of 1" = 40' showing recommended changes in striping including additional roadway and right-of-way necessary to mitigate the significant impact(s) of the project for each location where street reconfiguration is a proposed mitigation measure.
- Plans showing striping modifications should include adequate segments of the roadway (approximately 300-

400 feet on each leg of the intersection) to indicate the appropriate transitions from the existing striping.

 Plans should indicate parking restrictions (existing and proposed), bus stops (existing and relocated), driveways, signals, street lights, signs, trees, utility poles and catchment basins.

c. Traffic Volume Diagram

• Attach the a.m. and p.m. peak hour lane volume diagram with the geometric design plan for each intersection.

d. Finalize Plans as necessary

Revise mitigation plans as required and resubmit the final mitigation plans to LADOT for approval.

3.5B GUARANTEES OF MITIGATION MEASURES

All physical transportation mitigations and associated traffic signal work within the City must be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. All improvements along state highways and freeway ramps require approval from Caltrans. An encroachment permit must be obtained from Caltrans for these improvements before the issuance of any building permits.

In the event the originally proposed mitigation measure becomes infeasible, a substitute mitigation measure may be provided subject to approval by LADOT or other governing agency with jurisdiction over the location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.

3.5C MITIGATION MONITORING AND REPORTING PROGRAM IN DRAFT EIRS

Each mitigation measure part of a Project's mitigation monitoring program should be described separately for inclusion in the Draft EIR. The following details are required for each measure:

- Identification of the responsible agency for monitoring the measure and the designated coordination for all participants
- Qualifications, if any, of the necessary monitor(s)
- Monitoring schedule (i.e., the phase of the project during which the measure should be monitored, frequency, and completion/termination) - this should be stated for physical mitigation measures required during construction as well as those that are for the operation/life of the project (e.g., TDM program)
- Funding required and sources of funding for monitoring activities by both project and City personnel (especially for long-term monitoring activities)

SECTION 4:

Mitigating Transportation Impacts

This section of the guidelines presents mitigation categories in order of priority to the City. If a Transportation Impact Study (TIS) identifies Project-related impacts, these mitigation measures should be considered when evaluating and proposing transportation mitigations.

4.1 TRANSPORTATION DEMAND MANAGEMENT

Transportation Demand Management (TDM) is a general term for strategies and actions that improve overall transportation system efficiency by encouraging and supporting a shift from single-occupancy vehicle trips to other modes of travel, or moving vehicle trips out of peak periods. When successful, TDM influences how people choose to travel in order to make the most of existing transportation facilities and creates livable communities. Development Projects proposing the construction of new, nonresidential development in excess of 25,000 square feet gross floor area are required by LAMC 12.26-J to provide and maintain minimal TDM measures, by way of a covenant and agreement associated with the land, prior to issuance of a building permit, that the owner or applicant agree. LAMC 12.26-J is summarized in **Attachment J**.

LAMC 12.26-J notwithstanding, a consultant may be required to prepare a more comprehensive, integrated program of TDM measures. LADOT strongly encourages the development of a comprehensive TDM program to eliminate as many new Project single-occupancy vehicle trips from the transportation system as possible. TDM strategies should aim to reduce demand for single-occupancy vehicle trips by encouraging, promoting, and supporting the use of other sustainable modes of travel like public transit, walking, and bicycling.

If TDM strategies are claimed as a mitigation of Project-related traffic impacts, or if required under any applicable TSP or other City ordinances, then the TDM program shall include the following elements:

- A. Statement of measurable goals to be achieved
- B. Estimate of trips to be reduced
- C. Key elements of the program
- D. Schedule and responsibilities for funding and implementation
- E. Method of monitoring program performance
- F. Contingency plan and/or penalties for failure to achieve goals

If the Project is a mixed use project that includes housing, LADOT will consider adjusting the Project's trip generation to account for the internal trip characteristics of the Project. This adjustment shall be limited to the trips that would be affected by the special features of the Project relative to ITE or TSP trip generation rates. If the Project site is under one ownership or control; is uniquely located so as to permit accurate monitoring of all site trips; and extraordinary trip reduction goals are proposed, LADOT may recommend a trip cap agreement. Such an agreement typically places a cap on the total vehicle trips entering and leaving the site during peak hours and includes a monitoring and contingency plan.

To achieve additional vehicle trip reductions as traffic mitigation, TDM programs may include, but not be limited to, the following elements:

- Implementation of vehicle trip reduction incentives and services for Project employees and/or tenants; provide onsite education on alternative transportation modes.
- Implementation of flexible / alternative work schedules and telecommuting programs.
- Provide a bicycle and pedestrian-friendly environment; provide bicycle amenities such as secure bicycle racks, lockers and showers for employees.
- Provide bicycle parking beyond the requirements of the Bicycle Parking Ordinance No. 182,386.
- Enhance the environment for bicycling such as consolidating driveways and improving pavement conditions;
- Financial contribution to the City's Bicycle Plan Trust Fund.
- Implement a Neighborhood Friendly Street improvement as identified in the Mobility Plan 2035, which may include curb extensions, wayfinding signage, diverters, bicycle loop detection, shared lane markings, etc.
- Conduct educational workshops for Project employees and/or tenants related to the usage of bicycles on streets including how to integrate bicycles use with transit use and how to ride next to vehicles.
- Provide bicycle repair stations for use by Project employees and/or tenants.
- Provide fully or significantly subsidized transit passes to Project residents and/or employees.
- Implementation of first and last mile solutions that can increase the use of transit by bridging the gap between transit stops/stations and a commuter's origin or final destination.
- Implementation of a parking cash-out program.
- Pursuant to Internal Revenue Code Section 132(f), arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees.
- Vehicle trip reduction incentives and services affecting visitors to the project, such as shoppers, clients, patrons,
 etc.
- Financial support for the capital and/or operating costs of enhanced transit or vanpool service to the project.
- Provision of a variety (mixed use) of land uses in close proximity, facilitating trip making by walking, bicycling or local shuttles.
- Provision of onsite facilities that encourage the use of alternate forms of transportation such as bicycle lanes and amenities, enhanced pedestrian connections, telecommuting facilities, etc.
- Include site trip cap and/or parking cap in trip monitoring agreements.
- Join an existing Transportation Management Organization serving the area where the Project is located.

4.2 TRANSIT CAPACITY AND ACCESS IMPROVEMENTS

Vehicle trips generated by a Project may be reduced by operating or contributing to the operation of public transit systems. If a Transit Program is claimed as a mitigation of Project-related impacts, or if required under any applicable TSP or other City ordinances, the Transit Program shall contain elements similar to those in the TDM Program described above. Additionally, a description of the Transit Program and a letter of support from the related transit service provider is required.

The exact mitigation effectiveness shall be determined on the basis of the Project's size, type of use(s), and the frequency/density of transit service in the vicinity of the Project. The following elements should be considered when developing a Transit Program:

- Contribution of funds or equipment to increase the capacity of existing public transit systems (must be coordinated with transit providers)
- Transit shuttles provided by applicant (e.g., bus, taxicab, van, etc.)
- Contributions toward construction or enhancement of public transit stations or centers
- Construbutions toward construction of bike share station and/or operation/maintenance costs
- Provision of facilities or equipment which expedite transit flow (e.g., transit priority signal systems, exclusive transit lanes, HOV lanes, etc.)
- Contributions toward operation/maintenance costs and/or fleet vehicle replacement costs of existing public transit service (must be coordinated with providers)

4.3 PARKING MANAGEMENT MEASURES

Parking management strategies use existing parking facilities efficiently to reduce parking demand and shift travel away from single-occupancy vehicle trips. If Project-related transportation impacts are mitigated through a Parking Management Program, or if required under any applicable TSP or other City ordinances, the Program shall contain elements similar to those in the TDM program described above. Additionally, the following parking management strategies should be considered:

- Contribution of equipment or funds to LADOT ExpressPark Program to implement intelligent parking systems,
 which can include the use of new parking meter technology, vehicle sensors, dynamic signage, a central
 management system, and a real time parking guidance system. Such upgrades should be implemented along
 appropriate City block faces with existing parking meter zones in the vicinity of the Project, or at all approaches and
 departures of an impacted intersection.
- "Unbundling" of parking spaces in multiple unit residential development, e.g., parking shall be bought or rented separately when the dwelling units are initially bought or rented, enabling discounts for not using parking spaces and/or complementing Flex Car or other car sharing programs.
- "Unbundling" of parking spaces in non-residential development, e.g., employee parking is not to be provided free-of-charge and/or parking costs are listed as a separate line item in lease agreements. This would be a necessary component of a Parking Cash-Out program.

Shared parking agreements, e.g., parking is provided by existing parking facilities and shared by multiple land uses through an agreement among private lot and property owners.

4.4 JOBS / HOUSING BALANCE MEASURES

A travel demand mitigation value of up to 10% may be approved for a Development Project that incorporates Work Force housing (dwelling units affordable to, and reserved for, sale to Low and Moderate Income persons/families as defined in CA Health and Safety Code Section 50093 who are employed at the development) or that constructs such housing within a one-half mile of the Project. LADOT will determine the exact mitigation value based on an analysis of the development size and type of land use, employment type/density, and the number of Work Force housing units to be provided. The affordability of the Work Force housing units must be guaranteed for a minimum period of thirty (30) vears.

4.5 TRAFFIC SIGNAL OPERATIONAL IMPROVEMENTS

Traffic signal enhancements that include, but are not limited to, traffic signal phasing modifications, communication hub upgrades, new signal installations, CCTV camera installations, additional vehicle detector loops, etc., may be considered and provided as transportation impact mitigation or as supplemental measures to proposed intersection mitigations. Signal improvements that are considered Project-serving or that provide access to the project are not considered impact mitigations.

4.6 STREET RESTRIPING

Generally, street re-striping is not an acceptable mitigation measure because it often requires parking prohibitions which may cause secondary impacts in certain commercial and residential areas. Street restriping may be an acceptable complimentary element to another acceptable mitigation measure, such as installation of left-turn phasing, implementation of traffic signal upgrades, expanding transit service, etc.

4.7 PHYSICAL STREET IMPROVEMENTS

Street improvements recommended as impact mitigation must be physically feasible and meet minimum City standards. Physical mitigation measures proposed on a street identified in one of the six Network Concept Maps of the City's Mobility Plan 2035 should be designed to effectuate the modal priorities identified for that street. See Attachment K for a sample intersection mitigation drawing. Proposed physical mitigation measures shall not result in inadequate sidewalk widths, should accommodate pedestrian activities, and should meet ADA requirements.

4.7A PARKING INVENTORY AND DEMAND ANALYSIS

Any mitigation proposal that would require the loss of on-street parking should include an on-street parking utilization study at the intersections and/or along the roadway where the potential improvements were identified. The study results should be presented in a parking inventory and demand analysis that summarizes that area's parking demand and supply, and informs LADOT on the secondary impacts that may result from the loss of parking. This analysis should include proposed measures to mitigate any such impacts to the extent feasible. The scope of the parking utilization study, including study area and survey hours, shall be approved by the appropriate LADOT staff prior to commencing the survey.

4.7B PARKING METER REVENUE LOSS

When a mitigation proposal for a Development Project requires the permanent removal of any metered parking spaces, payment to LADOT for lost parking meter revenue is required. The lost revenue fee will be determined during the site plan or B-permit plan review process and will be based on the revenue collected over the last twelve continuous months for each removed parking meter, as determined by LADOT's Parking Meter Division. The removal of each on-street metered parking space will require payment to LADOT in the amount of the annual revenue projected over a ten year period. The Project applicant will also be subject to any costs incurred by LADOT during the removal of each parking meter, including but not limited to meter post removal, parking sensors (if any), sign and post removal/relocation, stall marking, payement messages, and curb painting.

4.8 FAIR SHARE CONTRIBUTIONS

If a TIS demonstrates that the Project applicant is responsible for only a portion of a large and costly transportation enhancement, such as a bridge or roadway improvement, a fair share contribution toward the cost of the improvement may be an acceptable mitigation. Fair share contributions are applicable in those cases where there are other proposed Development Projects in the vicinity that may also contribute toward the cost or when the City has other funding sources for the improvement.

4.9 TRANSPORTATION MITIGATION TRUST FUND

If Project is located in a TSP area, an applicant may be required to pay "mobility or trip fees" into a mitigation trust fund for implementation of regional transportation improvements specified in the TSP.

4.10 INFEASIBLE MITIGATION MEASURES

The TIS should also include a discussion of mitigation measures deemed to be infeasible, as appropriate, to record the reason(s) for rejecting these measures.

4.11 SUBSTITUTE MITIGATIONS

If a proposed transportation impact mitigation measure does not receive the required approval during plan review, a substitute mitigation measure may be provided subject to the approval of LADOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is environmentally equivalent or superior to the original measure in mitigating the Project's significant transportation impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant transportation impact would remain.

4.12 UNMITIGATED IMPACTS

Projects with unmitigated transportation impacts that seek a Statement of Overriding Considerations should evaluate and consider other suitable enhancements that improve quality of life in the public realm, such as non-restrictive traffic calming measures, traffic safety enhancements, signal timing upgrades, and community streetscape features (e.g., lighting, landscaping, shade, sidewalk repairs, etc.) Such community benefit improvements, whether voluntary or required, can serve to offset the significant impacts of a Project. If the Project results in unmitigated impacts after no other mitigation measures are feasible, the developer should consider revising and reducing the scope of the Project.

4.13 RESIDENTIAL NEIGHBORHOOD TRAFFIC MANAGEMENT PROGRAM

If the TIS indicates that the Project may result in residential street impacts, the applicant may be required to develop a plan to reduce Project-related trips from traveling through nearby residential areas as part of the mitigation program for the project. If Neighborhood Traffic Management (NTM) measures are required to offset potential residential street impacts, then, prior to Project occupancy, the applicant shall conduct public outreach and develop a NTM Plan. The Project applicant must consult with LADOT, the affected City Council District office, and neighborhood stakeholders to collaboratively prepare the NTM Plan. Coordination with the appropriate City Council District office may be necessary to designate the stakeholders that should facilitate the public outreach.

The Project applicant shall also be responsible for conducting the engineering evaluation of the potential measures to determine the feasibility in regards to drainage, constructability, street design, etc. The applicant shall also be responsible in implementing any NTM measures approved by LADOT and supported by stakeholders. Prior to the outreach, a cost estimate on the potential NTM Plan shall be determined in consultation with LADOT. The cost should be commensurate with the size of the Project and with the level of residential street impacts that are expected. The development of the NTM Plan shall include the analysis of any relevant traffic data, roadway characteristics, and conditions of the impacted residential street segments identified in the TIS.

The NTM Plan should focus solely on implementing non-restrictive traffic calming, which may include, but are not limited to, traffic circles, speed humps, roadway narrowing effects (raised medians, traffic chokers, etc.), landscaping features, roadway striping changes, and stop sign pattern. Restrictive measures such as turn restrictions, physical barriers, signal metering, etc., should not be considered since these measures can potentially lead to the diversion of traffic from one street to another, or one neighborhood to another. The NTM Plan should also consider and evaluate neighborhood improvements that can offset the effects of added traffic, including street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. Such measures can support trip reduction efforts by encouraging walking, bicycling, and the use of public transit.

As with other mitigation measures, any required NTM measures on City streets must be implemented prior to the issuance of any certificates of occupancy. A temporary certificate of occupancy may be granted in the event of any delay through no fault of the Project applicant, provided that the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. The NTM Plan shall be prepared in conformance with the guidelines established by LADOT and should contain, at a minimum, the following elements:

- Description of existing facilities and neighborhood traffic conditions,
- Description of proposed neighborhood traffic controls, including sketches of specific street modifications,
- Analysis of any change in existing or future traffic patterns as a result of implementation of the plan, and
- Implementation and monitoring program.

SECTION 5:

Bureau Contact Information

Thank you for your cooperation. If you have any questions, please contact the appropriate LADOT Bureau of Planning and Development Review office based on your geographic area (see Attachment L) or stage in development.

METRO DEVELOPMENT REVIEW

Projects proposed within all areas south of Mulholland Drive, east of Robertson Boulevard and north of the San Pedro Community Plan area

Mail 100 S. Main Street, 9th Floor Los Angeles, CA 90012 Telephone (213) 972-8482 or (213) 972-8481

WEST LOS ANGELES DEVELOPMENT REVIEW

Projects proposed within San Pedro and all areas south of Mulholland Drive and west of Robertson Boulevard

Mail 7166 W. Manchester Avenue Los Angeles, CA 90045 Telephone (213) 485-1062 Fax (213) 485-1285

VALLEY DEVELOPMENT REVIEW

Projects proposed within the entire San Fernando Valley north of Mulholland Drive

Mail 6262 Van Nuys Boulevard, 3rd Floor Van Nuys, CA 91401 Telephone (818) 374-4699 Fax (818) 374-4696

LADOT CITYWIDE ONE-STOP COUNTER

Projects proposed within the City that require early consultation on review processes and design standards, permit sign-off, condition clearance, driveway plan review, etc.

Mail 201 N. Figueroa Street, 5th Floor Los Angeles, CA 90012 Telephone (213) 482-7024 Fax (213) 482-7011

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ORDINANCE	NO.	_		_		eu	,-

An ordinance amending Section 19.15 of Article 9 of Chapter 1 of the Los Angeles Municipal Code in its entirety to revise and update the fees paid to the Department of Transportation for the review and assessment of traffic study reports, condition clearance and permit issuance activities related to obtaining any environmental clearance for private development projects within the City of Los Angeles.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 19.15 of Article 9 of Chapter 1 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 19.15. DEPARTMENT OF TRANSPORTATION TRAFFIC STUDY REVIEW, CONDITION CLEARANCE AND PERMIT ISSUANCE FEES.

(a) Fees. The following specific fees shall be paid to the Department of Transportation (Department) for the preparation and processing of traffic reports, clearance of conditions and permit sign-offs in connection with obtaining any environmental clearance and/or permit issuance related tasks.

(1)	Building Permit Sign Offs (Note 1)\$365
(2)	Dedication & Widening Waivers\$445
(3)	Department Referral Form (Note 2)\$430
(4)	Driveway Permit Sign Offs (Note 3)\$535
(5)	Haul Route Review\$420
(6)	Master Plan / Complex Circulation Review (Note 4)\$1,595
(7)	Project Condition Clearance (Note 5)\$270
(8)	Revocable Permit\$205
(9)	Street Vacation Requests\$965
(10)	Subdivision Report\$205
(11)	TDM Compliance / Trip Monitoring Report Review\$770
(12)	Technical Study (Note 6) \$1,340

(13)	Traffic Study MOU\$1,175
(14)	Traffic Study Review (Note 7)\$7,480
(15)	Traffic Study Review / Plan Review – Expedited
(16)	Worksite Traffic Control Plan Review (non B-permit)\$1,645

Note 1: For a project with multiple addresses and permits (i.e., multi-family units), \$365 should be charged per distinct site plan and not per unit. For example: if, for a 100 unit small lot subdivision condominium project, each unit falls into one of three different site plan options, then the Department review fee should be \$1,110 (\$370 X 3) even if there are 100 separate building permits to approve.

Note 2: The Department Referral Form may also be submitted to the Department in the form of an Initial Site Assessment Form or a Site Plan Review Form. If this is the case, the Department Referral Form fee still would apply.

Note 3: When reviewing a Building Permit application that also includes a Driveway Permit Sign Off, the applicant should not be charged two fees (Building Permit and Driveway Permit). Instead, the applicant should be charged only the Building Permit fee if the driveway plan does not include a new curb cut. If the driveway plan does include a new curb cut, then the applicant only should be charged the Driveway Permit Sign-Off fee.

Note 4: This fee applies to Master Plan type developments or large scale projects with complicated circulation plans that require considerable staff time to help applicant arrive at an acceptable access and circulation plan.

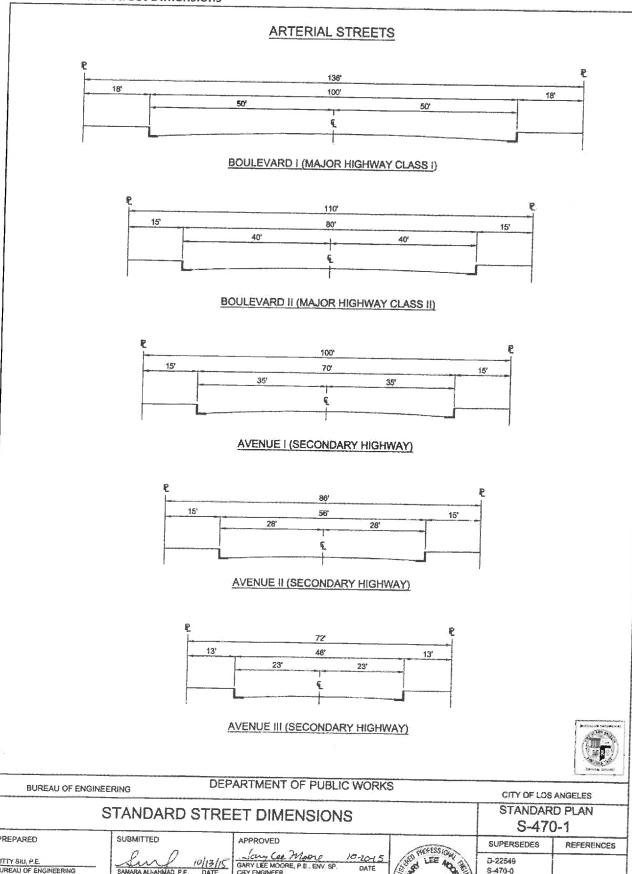
Note 5: \$270 for the first three condition clearances plus \$200 for each additional condition clearance.

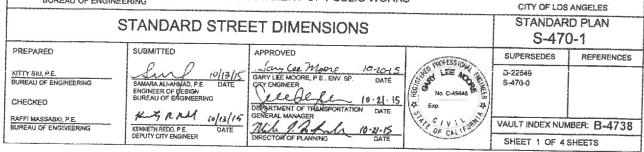
Note 6: A "technical study" can include technical memorandums (defined in LADOT's Traffic Study Guidelines), trip generation assessments, traffic study supplements, shared parking analyses, etc. The fee includes the cost to process a study MOU, if required.

Note 7: \$7,480 for the first ten study intersections plus \$400 per each additional study intersection, not to exceed a total of \$25,000.

Special Note: If a project is approved by LADOT through the subdivision clearance or building permit process and the applicable fees have been paid, future approvals will not require additional fees as long as there have been no substantial changes to the approved portion of the project.

- (b) Transportation Review Fee Fund. Each fee collected pursuant to this section shall include a five percent surcharge to be deposited into the Transportation Review Fee Fund No. 50Y. This fund shall be used exclusively by the Department to provide funding for the continual enhancement of development review related information technology systems and for procurement costs associated with equipment, software, materials, staff training and, if needed, consultant services. With the exception of the five percent surcharge deposited into the Transportation Fee Fund No. 50Y, the remaining 95 percent fees collected shall be credited to the General Fund.
- the review of traffic studies or the review of B-permit design plans. Project applicants can choose to pay a higher review fee to allow Department staff to work overtime hours to expedite their review. The actual review fee to process a traffic study, which will be greater than the standard traffic study review fee, will be determined by the Department during the preparation of the Traffic Study Memorandum of Understanding executed between the Department and the applicant's representative. The fee established shall be based on the applicant's desired completion date, the availability of staff to work overtime and the affected division's case workload. During times of peak workloads, the expedited review fee may be utilized by the Department to procure an outside firm from the Department's pré-screened list of consultants to conduct the review of the study. Similarly, the actual fee to process B-permit design plans shall be established by the Department at the pre-design meeting with the applicant's representative.
- (d) Fee Revisions. The Department shall provide an annual review of the fees established pursuant to this section, and shall submit recommendations for changes in these fees for special services to the Council. The fees shall be revised by the Department to account for any staff salary cost of living adjustments. Notice of a revision in fees shall be in accordance with California Government Code Sections 66018 and 6062a, which require that prior to adoption of a new or increased fee a public hearing be held and notice of that hearing be published in a newspaper with two publications at least five days apart over a ten-day period. The notice period begins the first day of publication, and there must be at least five days intervening between the first and second publications, not counting the dates of publication.

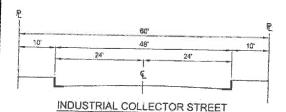


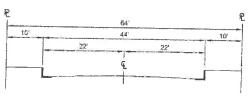


NON-ARTERIAL STREETS

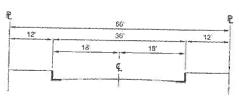
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COLLECTOR STREET





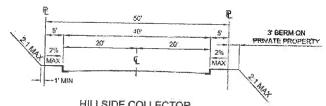
INDUSTRIAL LOCAL STREET



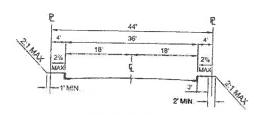
LOCAL STREET - STANDARD



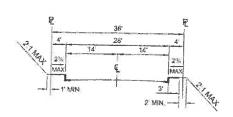
HILLSIDE STREETS



HILLSIDE COLLECTOR



HILLSIDE LOCAL



HILLSIDE LIMITED STANDARD



PUBLIC STAIRWAY

CONSTRUCTED IN ACCORDANCE WITH BUREAU OF ENGINEERING STANDARD PLANS



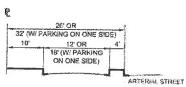
OTHER PUBLIC RIGHTS-OF-WAY



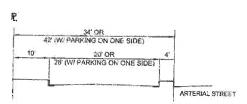
SHARED STREET



PEDESTRIAN WALKWAY

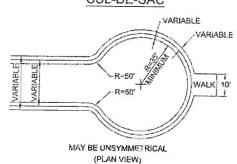


ONE-WAY SERVICE ROAD



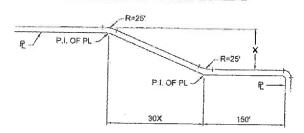
BI-DIRECTIONAL SERVICE ROAD

CUL-DE-SAC



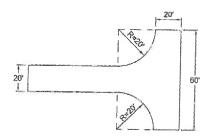
NOTE: FOR FIRE TRUCK CLEARANCE, NO OBSTRUCTION TALLER THAN 6" SHALL BE PERMITTED WITHIN 3FT. OF THE CURB, ON-STREET PARKING SHALL BE PROHIBITED.

TRANSITIONAL EXTENSIONS

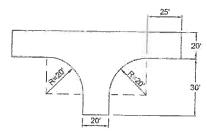


STANDARD FLARE SECTION (PLAN VIEW)

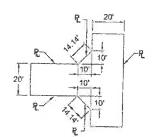
ALLEYS



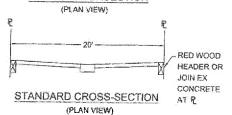
STANDARD TURNING AREA (PLAN VIEW)



MINIMUM TURNING AREA (PLAN VIEW)



STANDARD CUT CORNERS FOR 90° INTERSECTION





NOTES

- CITY COUNCIL MAY, BY ORDINANCE, ADOPT SPECIFIC STANDARDS FOR INDIVIDUAL STREETS THAT DIFFER FROM THESE OFFICIAL STANDARD STREET DIMENSIONS. COMMUNITY PLANS AND SPECIFIC PLANS SHOULD BE REVIEWED FOR FOOTNOTES, INSTRUCTIONS AND/OR MODIFIED STREET DIMENSIONS THAT WOULD REQUIRE STANDARDS DIFFERENT THAN THOSE INDICATED ON THIS STANDARD PLAN.
- FOR ADDITIONAL GUIDANCE AS TO THE USE OF THE ROADWAY AND SIDEWALK AREA, PLEASE REFER TO THE COMPLETE STREET DESIGN GUIDE AND MANUALS.
- FOR DISCRETIONARY PROJECTS REQUIRING ACTION FROM THE DEPARTMENT OF CITY PLANNING (PLANNING), PLANNING MAY INCLUDE SPECIFIC INFORMATION AS TO THE DESIGN AND UTILIZATION OF THE SIDEWALK AREA.
- 4. WHERE A DESIGNATED ARTERIAL CROSSES ANOTHER DESIGNATED ARTERIAL STREET AND THEN CHANGES IN DESIGNATION TO A STREET OF LESSER STANDARD WIDTH, THE ARTERIAL SHALL BE TAPERED IN A STANDARD FLARE SECTION ON BOTH SIDES, AS ON SHEET 3, TO MEET THE WIDTH OF LESSER DESIGNATION AND PROVIDE AN ORDERLY TRANSITION.
- 5. PRIVATE STREET DEVELOPMENT SHOULD CONFORM TO THE STANDARD PUBLIC STREET DIMENSIONS SHOWN ON THE SHEET, WHERE APPROPRIATE. VARIATIONS MAY BE APPROVED ON A CASE-BY-CASE BASIS BY THE CITY.
- 6. FIFTY-FOOT CURB RADII (INSTEAD OF THE STANDARD 35' CURB RADII) SHALL BE PROVIDED FOR CUL-DE-SACS IN INDUSTRIAL AREAS. SEE CUL-DE-SAC ILLUSTRATION FOR FURTHER DESIGN STANDARDS.
- ALLEYS SHALL BE A MINIMUM OF 20' IN WIDTH AND INTERSECTIONS AND/OR DEAD-END TERMINUSES SHALL BE DESIGNED TO CONFORM TO THE ALLEY ILLUSTRATIONS INCLUDED HEREIN.
- 8. FOR INTERSECTIONS OF STREETS, THE FOLLOWING DEDICATIONS SHALL APPLY:
 - A. INTERSECTIONS OF ARTERIAL STREETS WITH ANY OTHER STREET, 15"X 15" CLIT CORNER OR 20" CURVED CORNER RADIUS.
 - B. INTERSECTIONS ON NON-ARTERIAL AND/OR HILLSIDE STREETS: 10' X 10' CUT CORNER OR 15' CURVED CORNER RADIUS
- 9. STREETS THAT ARE ACCOMPANIED BY A PARALLEL FRONTAGE AND/OR SERVICE ROAD ARE DEEMED TO MEET THE STREET STANDARDS SET FORTH HEREIN AND THE DEDICATION REQUIREMENT SHALL BE NO MORE THAN IS NECESSARY TO BRING THE ABUTTING SIDEWALK DIMENSION INTO COMPLIANCE WITH THE STREET STANDARD.
- 10. DUE TO THEIR UNIQUE CHARACTER AND DIMENSIONS ALL STREETS DESIGNATED AS DIVIDED ARE CONSIDERED TO HAVE MET THEIR STREET STANDARD AND THE DEDICATION SHALL BE NO MORE THAN IS NECESSARY TO BRING THE ABUTTING SIDEWALK DIMENSION COMPLIANT WITH THE STREET STANDARD.
- 11. THE DIMENSION OF ANY MEDIAN, DIVIDED STRIP AND/OR TRANSIT WAY SHALL BE INCLUDED WHEN DETERMINING THE RIGHT-OF-WAY DIMENSION.
- 12. THE LOCATION OF THE DRAINAGE GUTTER IS NOT RESTRICTED TO THE CENTER OF THE SHARED STREET AND CAN BE PLACED WHERE NECESSARY AS APPROVED BY THE CITY.
- 13. A SHARED STREET SHALL PROVIDE A DEDICATED PEDESTRIAN ACCESS ROUTE.



LADOT

Transportation Impact Study Memorandum of Understanding (MOU)

This MOU acknowledges that the Transportation Impact Study for the following Project will be prepared in accordance with the latest version of LADOT's Transportation Impact Study Guidelines:

Project Name:								
Project Address:								
Project Description:								
LADOT Project Case Number	:			Project S	Site Plan attac	hed? (Requ	rired) 🗆 Y	′es □ No
II. TRIP GENERATIO	N							
Geographic Distribution: N		_ %	s	%	Е	%	W	%
Illustration of Project trip dist	ribution pe	rcentage	s at Study i	ntersect	ions attached	? (Required)	□ Yes	
Trip Generation Adjustments								
•	Yes	No	αυμετί το αρρί	OVUI DY LAL	<i>J01)</i>			
Transit Usage								
Transportation Demand Management								
Existing Active Land Use								
Previous Land Use								
Internal Trip		\Box						
Pass-By Trip								
Source of Trip Generation Rat	e(s)? 🔲 I	ΓΕ 9 th Edit	tion 🗀 (Other:				
Trip generation table including afternoon peak hour volumes	g a descripti	on of the	proposed	land use	s, ITE rates, e	stimated n	norning ar	nd
	<u>IN</u>		OUT		TOTAL			
AM Trips PM Trips		-						
II. STUDY AREA AND	A CCIINAI	TIONS						
	ASSUMI	NON2						
roject Buildout Year:		_			P Growth Rat			% Per Yr.
elated Projects List, researche								
ubject to Freeway Impact Ana 10U; selecting "yes" implies that at lea.	lysis, in add st one criteria v	lition to C was satisfied	CMP Analys () □ Yes	is? <i>(Fre</i> □ No	eway analysis scr	eening filter i	must be inclu	ided in this
lap of Study Intersections atta	iched? (May	be subject to	o LADOT revis	ion after in	itial impact analy	sis)	∕es □ N	0
this Project located on a stree						,		•



City of Los Angeles Transportation Impact Study MOU

IV. CONTACT INFORMATION

<u>CONSULTANT</u>	<u>DEVELOPER</u>
Name:	
Address:	
Phone Number:	
E-Mail:	
Approved by: x	X
Consultant's Representative Date	LADOT Representative Date

PASS-BY TRIP RATES

PASS-BY TRIP DISCOUNT RATE	LAND USE CATEGORY
10%	Shopping Center 600,000 sf or more, Quality Restaurant, Specialty Retail, Furniture Store, Medical Office, Day Care, Theater/Cinema, Auto Sales/Repair
15%	Discount Club, Discount Store
20%	Shopping Center 300,000 to less than 600,000 sf, Bank/Savings & Loan, High Turnover Restaurant, Car Wash, Hardware/Lumber Store, Garden Center, Recreation/Health Club
30%	Shopping Center 100,000 to less than 300,000 sf, Auto Parts, Music/Video Store
40%	Shopping Center 50,000 to less than 100,000 sf, Supermarket, Drugstore, Bookstore
50%	Shopping Center less than 50,000 sf, Fast Food Restaurant, Gasoline/Service Station, Convenience Market, Flower/Bakery/Yogurt Shop, Dry Cleaner, Liquor Store

Note: These rates are derived from surveys published in the "Trip Generation Handbook: An ITE Recommended Practice," 2003.

Attachment E: Manual Traffic Count Summary



City Of Los Angeles Department Of Transportation

MANUAL TRAFFIC COUNT SUMMARY

STREET:

North/South

BROADWAY

East/West

75TH ST

Day:

MONDAY

Date: JULY 16, 2007

Weather:

SUNNY

Hours:

7-10AM 2-5PM

School Day:

YES

District:

CENTRAL I/S CODE 1451

DUAL-	N/B	<u>S/B</u>	E/B	W/B
WHEELED	101	139	3	6
BIKES	0	11	0	0
BUSES	0	98	0	0

	N/B	TIME	S/B	TIME	E/B	TIME	W/B	TIME
AM PK 15 MIN	329	7.15	168	7.45	5	8.00	28	7.15
PM PK 15 MIN	174	2.15	273	4.45	12	2.15	56	2.30
AM PK HOUR	1230	7.15	625	7.15	14	7.15	106	7.15
PM PK HOUR	609	2.00	1002	4.00	33	2.00	111	2.15

NORTH	BOUND .	Approa	ich		SOUTHB	SOUTHBOUND Approach					XING	S/L	XING	N/L
Hours	Lt	Th	Rt	Total	Hours	Lt	Th	Rt	Total	N-S	Ped	Sch	Ped	Sch
7-8	7	1056	94	1157	7-8	47	550	11	608	1765	63	25	0	0
8-9	4	806	63	873	8-9	32	459	5	496	1369	30	8	2	0
9-10	2	529	10	541	9-10	10	374	4	388	929	4	0	1	0
2-3	9	518	82	609	2-3	33	679	12	724	1333	89	40	0	0
3-4	5	448	19	472	3-4	30	816	16	862	1334	12	4	4	
4-5	8	514	21	543	4-5	20	973	9	1002	1545	16	0	5	0
TOTAL	35	3871	289	4195	TOTAL	172	3851	57	4080	8275	214	77	12	0

2-3 3-4 4-5 TOTAL	9 518 82 609 5 448 19 472 8 514 21 543 35 3871 289 4195	2-3 3-4 4-5 TOTAL	33 679 12 724 30 816 16 862 20 973 9 1002 172 3851 57 4080	1333 1334 1545 8275	89 40 12 4 16 0	0 0 4 0 5 0
	JND Approach	WESTBO	UND Approach	TOTAL	XING W/L	XING E/L
Hours	Lt Th Rt Total	Hours	Lt Th Rt Total	E-W	Ped Sch	Ped Sch
7-8	1 2 10 13	7-8	43 4 54 101	114	70 39	45 2
8-9	2 2 4 8	8-9	32 2 34 68	76	46 11	35 1
9-10	6 0 7 13	9-10	18 1 19 38	51	30 3	12 0
2-3	6 5 22 33	2-3	42 5 60 107	140	103 100	74 25
3-4	6 6 10 22	3-4	34 2 27 63	85	63 18	38 7
4-5	9 4 9 22	4-5	32 5 27 64	86	48 11	32 0
TOTAL [30 19 62 111	TOTAL	201 19 221 441	552	360 182	236 35

(Rev Oct 06)

Attachment F: Bicycle and Pedestrian Count Forms

City of Los Angeles

Department of Transportation

BICYCLE COUNT SUMMARY

Level Three Draft 6/09/15

STREET:

North/South:

"A" Street

East/West:

"B" Street

Day:

Hours:

Monday

Date: District: 0

Th

0

0

0

0

Rt

0

0

0

0

0

Weather:

Sunny

0

School Day:

Yes 7-10 AM & 3-6 PM

Staff:

0 0 I/S CODE:

Total

0

0

0

0

0

0

NORTHBOUND Approach

Hours
7-8
8-9
0 40

9-10

3-4 4-5 5-6

Lt	Th Rt		Total
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0

0

0

0

0

0

0

TOTAL

Hours 7-8 8-9

9-10 3-4 4-5

5-6

TOTAL

SOUTHBOUND Approach

0 0 0 0 0 0

0

TOTAL

N-S					
	0				
	0				
	0				
	0				
	0				
	0				

EASTBOUND Approach

Hours
7-8
8-9
9-10
3-4
4-5

5-6

TOTAL

	Lt	<u>ın</u>	Kt	Total
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
	0	0	0	0
l	0	0	0	0
	0	0	0	0

WESTBOUND Approach

Hours
7-8
8-9
9-10
3-4
4-5
5-6

Lt	_ <u>Lt</u> Th		Total		
0	0	0	0		
0	0	0	0		
0	0	0	0		
0	0	0	0		
0	0	0	0		

L	0	0	0	0
	0	0	0	0

TO	TΑ	ıL.

0

E-W
0
.0
0
0
0
0
0

REMARKS (6 hour total):

- Female riders
- No helmet riders
- Sidewalk riding
- Wrong way riding

MR	SB	EB	WB	TOTAL
1	1	1	1	4
		,		;

1	4	1	1	,
1	4	4	1	10
1	1	1	1	4

NB: Northbound, SB: Southbound, EB: Eastbound, WB: Westbound, I/S: Intersection

Source: (company name)

LADOT 2015 CMP

City of Los Angeles Department of Transportation

PEDESTRIAN COUNT SUMMARY

Level Three Draft 6/11/15

STREET:											
North/Sou	th :	"A" St	reet								
East/West	:	"B" St									
Day:		Monda	ıy		Date:			W	eather:	Sunn	
School Day:		Yes			– District	: Central		_	CODE:	0	У
Hours:		7-10 AI	M & 3-6	PM	Staff:	0		- -	CODE.		
		ΔМ	PEAK PI	PIOD							
15 Min. interval	N-LEG	S-LEG	E-LEG		~~~				PEAK PE	ERIOD	
				W-LEG	TOTAL	15 Min. interval	N-LEG	S-LEG	E-LEG	W-LEG	TOTAL
7:00 - 7:15	0	0	0	0	0	3:00 - 3:15	0	0	0	0	0
7:15 - 7:30	0	0	0	0	0	3:15 - 3:30	0	0	0	0	0
7:30 - 7:45	0	0	0	0	0	3:30 - 3:45	0	0	0	0	0
7:45 - 8:00	0	0	0	0	0	3:45 - 4:00	0	0	0	0	0
8:00 - 8:15	0	0	0	0	0	4:00 - 4:15	0	0	0	0	0
8:15 - 8:30	0	0	0	0	0	4:15 - 4:30	0	0	0	0	0
8:30 - 8:45	0	0	0	0	0	4:30 - 4:45	0	0	0	0	0
8:45 - 9:00	0	0	0	0	0	4:45 - 5:00	0	0	0	0	0
9:00 - 9:15	0	0	0	0	0	5:00 - 5:15	0	0	0	0	0
9:15 - 9:30	0	0	0	0	0	5:15 - 5:30	0	0	0	0	0
9:30 - 9:45	0	0	0	0	0	5:30 - 5:45	0	0	0	0	0
9:45 -10:00	0	0	0	0	0	5:45 - 6:00	0	0	0	0	0
Hours	N-LEG	S-LEG	E-LEG	W-LEG	TOTAL	Hours	N-LEG	S-LEG	E-LEG	W-LEG	TOTAL
7 - 8	0	0	0	0	0	3 - 4	0	0 !	0		
8 - 9	0	0	0	0	0	4-5	0	0		0	0
9 - 10	0	0	0	0	0	5-6	0	0	0	0	0
TOTAL						5 0		U	0	0	0
TOTAL	0	0	0	0	0	TOTAL	0	0	0	0	0

REMARKS (6 hour total):

- Wheelchair/special needs assistance

- Skateboard/scooter

N-LEG	S-LEG	E-LEG	W-LEG	<u>TOTAL</u>
0	0	0	0	0
0	0	0	0	0

 \mathbf{N} : North, \mathbf{S} : South, \mathbf{E} : East, \mathbf{W} : West, $\mathbf{I/S}$: Intersection

Source: (company name)

LADOT 2015 CMP

Attachment G: Level of Service Worksheet



Level of Service Worksheet (Circular 212 Method)



	3																	200	1377
I/S #:		d Avenue			Yea	ar of Cour	t: 2016	Aml	pient Gro	wth: (%):	1.0	Condi	icted but	Article 1		T 5-4-		0/05/05	
CMA01 East-West Street: Franklin Avenue			Proje	Projection Year: 2018 Peak Hour:				Reviewed by: KB			KR	Date: 9/27/2016 Project: 5-16-9264-1 Project							
	Nc. of Phases pposed Ø'ing: N/S-1, E/W-2 or Both-3? t Turns: FREE-1, NRTOR-2 or OLA-3? ATSAC-1 or ATSAC+ATCS-2? Override Capacity	NB- 3 EB- 0	SB- WB-	3 0 0 3 2	NB EB	3 S		NB- EB	3 0	SB- WB-	3 0 0 3 2	NB- EB-	3 0	SB- WB-	3 0 0 3 2	NB- EB-	3 0	SB- WB-	3 0 0 3 2
MOVEMENT EXISTING CONDITION No. of			EXIST	ING PLUS P		FUTURE CONDITION W/O PROJECT			FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION						
				Lane	Project	Total	Lane	Added	Total	No. of	Lane	Added	Total	No. of	Lane	Added	Total	No. of	
-	Left	Volume	Lanes	Volume 0	Traffic	Volume	Volume	Volume	Volume	Lanes	Volume	Volume	Volume	Lanes	Volume	Volume	Volume	Lanes	Lane Volume
NORTHBOUND	Left-Through Through Through-Right Right Left-Through-Right Left-Right	2624 128	0 3 0 1 0	8 75 0	0 2	0 2624 130	0 875 0	0	2677 131	0 3 0 1 0	0 892 0	0 0 2	2677 133	0 0 3 0 1 0 0	892 0	0	2677 133	0 0 3 0 1	0 892 0
SOUTHBOUND	Left Left-Through Through Through-Right Right Right Left-Through-Right Left-Right	193 2181 1	1 0 3 0 0	103 727 0	1 0 0	104 2181 1	104 727 0	0	105 2225 1	1 0 3 0 0	105 742 0	1 0 0	106 2225 1	1 0 3 0 0	106 742 0	0 0 0	106 2225 1	1 0 3 0	106 742 0
EASTBOUND	J Left J Left-Tirrough ── Through ── Through-Right Right Right Left-Through-Right { Left-Right	0 1 0	0 0 0 0 0	0 0	0 0	0 1 0	0	D O	0 1 0	0 0 0 0 0 0 0 0	0 0	G O G	0 1 0	0 0 0 0 0 0 0	0	0 0	0 1 0	0 0 0 0	0 0
WESTBOUND	Left-Through Through Through-Right Right Left-Through-Right Left-Right	614 0 73	2 0 0 0 1 0 0	338 0	2 0	616 0 74	339 0	0	626 0 74	2 0 0 0	0 0	2 G	628 0 75	2 0 0 0 1 0	345 0	0 5 0	628 0 75	0 0 0 0	345 0
V/C	CRITICAL VOLUMES VOLUME/CAPACITY (V/C) RATIO: LESS ATSAC/ATCS ADJUSTMENT:		SUM:	978 338 1316 0.924 0.824		st-West: SUM:	979 339 1318 0.925		North- East	-West: SUM;	997 344 1341 0.941				998 345 1343 0.942			South: t-West: SUM:	998 345 1343 0.942
LEVEL OF SERVICE (LOS): D							0.825 D				0.841 D				0.842 D				0.842 D

Version: 1i Beta; 8/4/2011

Significant impacted? NO Fully mitigated? N/A

9/27/2016-8:50 AM

CMA01

TRANSPORTATION DEMAND MANAGEMENT AND TRIP REDUCTION MEASURES

(LAMC Section 12.26-J - amended by Ordinance 168,700)

1. DEFINITIONS

For the purpose of this section, certain words and terms are defined as follows:

Carpool. A vehicle carrying two to five persons to and from work on a regular schedule.

Development. The construction of new non-residential floor area.

Gross Floor Area. That area in square feet confined within the outside surface of the exterior walls of a building, as calculated by adding the total square footage of each of the floors in the building, except for that square footage devoted to vehicle parking and necessary interior driveways and ramps. Preferential Parking. Parking spaces, designated or assigned through use of a sign or painted space markings for Carpools or Vanpools, that are provided in a location more convenient to the entrance for the place of employment than parking spaces provided for single-occupant vehicles. Transportation Demand Management (TDM). The alteration of travel behavior through programs of incentives, services, and policies, including encouraging the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).

Trip Reduction. Reduction in the number of work-related trips made by single-occupant vehicles. **Vanpool.** A vehicle carrying six or more persons to and from work on a regular schedule, and on a prepaid basis.

Vehicle. Any motorized form of transportation, including but not limited to automobiles, vans, buses and motorcycles.

2. APPLICABILITY

This subdivision applies only to the construction of new non-residential gross floor area. Prior to the issuance of a building permit, the owner/applicant shall agree, by way of a covenant that runs with the land, to provide and maintain in a state of good repair the following applicable transportation demand management and trip reduction measures.

3. REQUIREMENTS

- (a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:
 - (1) Current routes and schedules for public transit serving the site;
 - (2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
 - (3) Ridesharing promotion material supplied by commuter-oriented organizations;
 - (4) Regional/local bicycle route and facility information;
 - (5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

- (b) **Development in excess of 50,000 square feet of gross floor area.** The owner shall comply with Paragraph (a) above and in addition shall provide:
 - (1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;
 - (2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;
 - (3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;
 - (4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;
 - (5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;
 - (6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and access ways used by vanpool vehicles when located within a parking structure;
 - (7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.
- (c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:
 - (1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;
 - (2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;
 - (3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/ or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;
 - (4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

4. EXCEPTIONS

The provisions of this subsection shall not apply to developments for which an application has been deemed complete by the City pursuant to Government Code Section 65943, or for which a Notice of Preparation for a Draft Environmental Impact Report has been circulated or for which plans sufficient for a complete plan check were accepted by the Department of Building and Safety, on or before the effective date of this ordinance (03/31/1993).

5. MONITORING

The Department of Transportation shall be responsible for monitoring the owner/applicant's continual implementation and maintenance of the project trip reduction features required by this ordinance.

6. ENFORCEMENT

Applicants shall execute and record a Covenant and Agreement that the trip reduction features required by this ordinance will be maintained, that required material specified in Subdivision 3 (a) (1)-(5) will be continually posted, and that additional carpool/vanpool spaces within the designated preferential area will be signed and striped for the use of ridesharing employees based on demand for such spaces. The Covenant and Agreement shall be acceptable to the Department of Transportation.

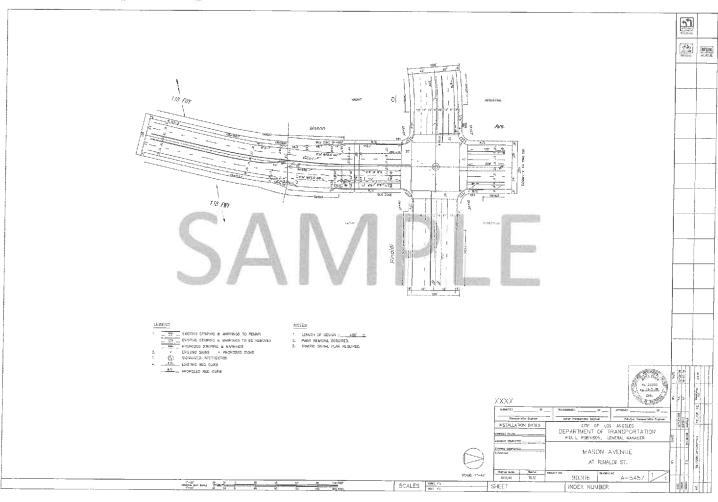
7. HARDSHIP EXEMPTION

In cases of extreme hardship, duly established to its satisfaction, the City Council, acting in its legislative capacity, and by resolution, may grant an exemption from any/or all the provisions of this ordinance. In granting such an exemption, the City Council shall make the following findings:

- (a) Specific features of the development make it infeasible to satisfy all of the provisions of this subsection; and
- (b) The applicant has committed to provide equivalent alternative measures to reduce vehicle trips.

Attachment I: Sample Physical Mitigation Drawing

Sample Physical Mitigation Drawing



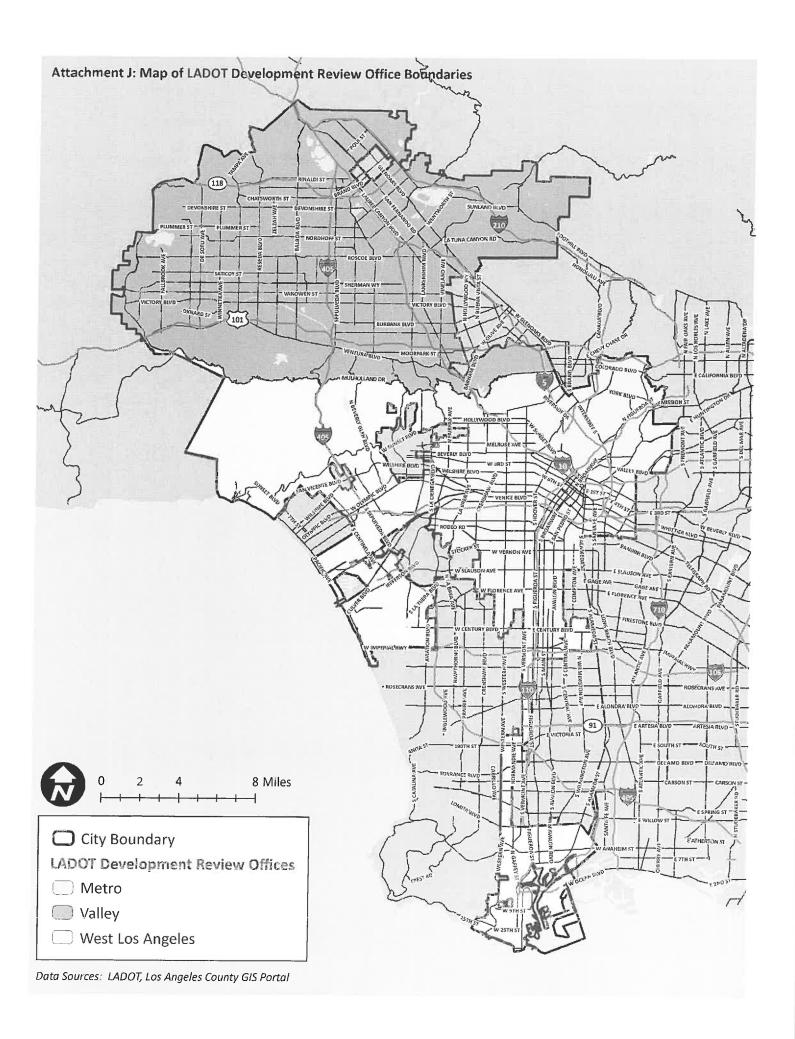


EXHIBIT C

L.A. CEQA Thresholds Guide 2006 (523 Pages) - Included in the VTT-74172 Case File

L.A. CEQA THRESHOLDS GUIDE

Your Resource for Preparing CEQA Analyses in Los Angeles

City of Los Angeles 2006

CITY OF LOS ANGELES

MAYOR

Antonio R. Villaraigosa

CONTROLLER

CITY ATTORNEY

Laura N. Chick

Rocky Delgadillo

CITY COUNCIL

Ed Reyes	Tony Cardenas	Bill Rosendahl
First District	Sixth District	Eleventh District

Wendy Greuel Alex Padilla, President Greig Smith Second District Seventh District Twelfth District

Dennis P. Zine Bernard Parks Eric Garcetti
Third District Eighth District Thirteenth District

Tom LaBonge Jan Perry José Huizar

Fourth District Ninth District Fourteenth District

Jack WeissHerb J. Wesson, Jr.Janice HahnFifth DistrictTenth DistrictFifteenth District

ENVIRONMENTAL AFFAIRS COMMISSION

Misty Sanford, President Alina Bokde, Vice President Maria Armoudian Joyce Perkins M. Teresa Villegas

ENVIRONMENTAL AFFAIRS DEPARTMENT

Detrich B. Allen, General Manager Gretchen Hardison, Director of Air Quality Division José Gutiérrez, Environmental Supervisor Wayne King, Environmental Specialist

Renée Brandt, Eagle Environmental

L.A. CEQA THRESHOLDS GUIDE:

Your Resource for Preparing CEQA Analyses in Los Angeles

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.
This Thresholds Guide is intended to provide general information about CEQA. It should not be used as a substitute for professional or legal advice. The reader should refer to the CEQA Statutes and Guidelines and consult with the appropriate City departments, as necessary.

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EXECUTIVE SUMMARY

Purpose

The L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (Thresholds Guide) is a guidance document that draws together practical information useful to City staff, project proponents, and the public involved in the environmental review of projects in the City of Angeles subject to the California Environmental Quality Act (CEQA). The CEQA process, established by state law, requires the review of proposed projects in order to identify and address potential environmental effects.

This is the City's initial effort to develop citywide guidance for CEQA impact analyses. The applicability and use of the Thresholds Guide may be re-evaluated after a period of use. The *Thresholds Guide* is intended to be available as a voluntary tool. It supports the City's development reform efforts to streamline and enhance the City's permit and development processes. The Thresholds Guide is a consensus document that represents the technical input from a citywide working group, comprised of representatives from 18 City departments and bureaus, including the Environmental Affairs Department (EAD).

Content

The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening and significance criteria. The screening criteria provide assistance in responding to the questions in the State's Initial Study Checklist and, thus, determining the appropriate environmental document to prepare (e.g., negative declaration, mitigated negative declaration, or environmental impact report). The significance thresholds assist in determining whether a project's impacts would be presumed significant under normal

circumstances and, therefore, require mitigation to be identified.

The *Thresholds Guide* contains three types of significance thresholds quantitative, qualitative, and case-by-case. Ouantitative thresholds provide a measurable criterion with which to compare one or more characteristics of the proposed project, such as "the vehicle-tocapacity ratio increase at a study intersection is greater than 0.020." A qualitative threshold requires comparison to non-numerical criteria, such as "interference with a wildlife movement corridor." The case-by-case thresholds were developed for issue areas where a definitive threshold could not be established, either because impacts are site- or project-specific or because there is no consistent technical guidance available. The existence of screening criteria and significance thresholds may also encourage project proponents to incorporate impactreducing measures into project designs, prior to submitting project applications to the City, to reduce potential impacts below the significance level.

The screening criteria and significance thresholds are based on a variety of factors, including existing local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards. Each threshold has been reviewed with respect to meeting the following goals: objectivity and applicability, defensibility, practicality, nexus between impacts and mitigation, and legal liability.

The Thresholds Guide provides assistance in evaluating 46 of the most common environmental issues in the City of Los Angeles, grouped into the following categories:

• Air Quality

• Population and Housing

- Biological Resources Public Services
- Cultural Resources
- Public Utilities
- Geology
- Transportation
- Hazards
- Visual Resources
- Land Use
- Water Resources
- Noise

The information is organized generally in the same order in which the issues appear in the State's Initial Study Checklist, although the *Thresholds Guide* does not identify thresholds for all issues found in the Checklist.

Within each issue area, the Thresholds Guide includes three parts: 1. Initial Study Screening Process (Initial Study Checklist Question, Introduction, Screening Criteria, and Evaluation of Screening Criteria); 2. Determination of Significance (Significance Threshold. Environmental Setting, **Project** Impacts, Cumulative Impacts, and Sample Mitigation and 3. Data. Resources, and Measures): References (Resources, Background Information, Selected Legislation, and Exhibits).

How the Thresholds Guide works

The *Thresholds Guide* provides technical assistance in evaluating the potential significance of a project's environmental impacts by putting in one place existing information and practices from a variety of sources which are useful for impact analyses. The *Thresholds Guide* applies to non-exempt, discretionary projects (including public and private projects and plans) in the City of Los Angeles under "normal" conditions. It recognizes that the impacts resulting from a particular action depend on the project setting, design, and operational components and that the determination of significance and the appropriate criteria for evaluation are the responsibility of the lead agency.

The *Thresholds Guide* does not change the authority of decision-makers or the lead agency or affect the City's CEQA Guidelines (including the list of categorical exemptions). The

Thresholds Guide does not change existing department procedures for processing CEQA documents or introduce new evaluation methods.

The purpose and applicability of the *Thresholds Guide* are fully described in the Preface and Content and Use Sections of the Introduction. The *Thresholds Guide* provides some general information about CEQA requirements, but should not be used as a substitute for professional or legal advice. For more information, the reader should refer to the CEQA Statutes and State and City Guidelines; current case law, regulations, and scientific methods; and consult with the appropriate City departments, as necessary.

Background and Process

Numerous public and private projects and plans are undertaken each year within the City of Los Angeles. Each of these must comply with all applicable laws, regulations, and policies, including CEOA. For those projects needing discretionary approval from the City of Los Angeles, the department granting the approval generally acts as the lead agency on behalf of the City and ensures that all CEQA requirements are fulfilled. The Thresholds Guide can simplify the CEQA process by offering a consistent set of evaluation criteria applicable to most discretionary projects in the City.

The *Thresholds Guide* was presented and discussed at a public workshop hosted by the Environmental Affairs Commission (EAC). The EAC sent recommendations on the *Thresholds Guide* to the Environmental Quality and Waste Management Committee of the City Council, and the full Council authorized departments to use the *Thresholds Guide* in CEQA analyses in August 2001 (see Council File 98-2064).

For information, and to view or download a copy of the *Thresholds Guide*, please point your browser to EAD's Home Page at http://www.lacity.org/EAD, and click on CEQA/.

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INTRODUCTION

PREFACE

The L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (Thresholds Guide) is a guidance document that draws together practical information useful to City staff, project proponents, and the public involved in the environmental review of projects subject to the California Environmental Quality Act (CEQA). The *Thresholds Guide* is a resource available to provide information to those interested in the CEQA process.

The Thresholds Guide provides assistance in evaluating the significance of project impacts on 46 of the most common environmental issues in the City of Los Angeles. This guidance is supplemented by an introduction to each issue area, a recommended analysis method for project impacts, guidance for environmental setting and cumulative impact sections, sample mitigation measures, and references. The Thresholds Guide is geared toward readers familiar with the CEQA process. For additional information on the terminology and requirements of CEQA, please refer to the Glossary to the Thresholds Guide, The Los Angeles City CEQA Guidelines (City CEQA Guidelines), the State Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) or the City's Guide to Understanding CEQA in the City of Los Angeles.

The preparation of the *Thresholds Guide* was initiated as part of the City's Development Reform efforts to streamline the City's permit and development processes. It is a tool that compiles information that is useful in the preparation of environmental documents. This information can be used to improve the level of consistency, predictability, and objectivity of the City's environmental documents, while reducing costs and time delays in the environmental review process.

CEQA requires the analysis of discretionary projects to disclose their potential effects on the environment and to allow public participation in the environmental review process. Central to the implementation of CEQA is the identification of "significant" or "potentially significant" impacts that would occur as a result of a proposed project, as this determines the level of review required and the need for mitigation measures to reduce or eliminate project impacts. For projects needing discretionary approval from the City of Los Angeles, the department granting the approval generally acts as the lead agency on behalf of the City and is known as the lead City agency.

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The Thresholds Guide applies only to those non-exempt projects subject to CEQA that require an Initial Study, negative declaration, mitigated negative declaration, or EIR. It applies both to public and private projects, including residential, commercial, institutional, industrial, and infrastructure projects. Most screening criteria and significance thresholds also apply to Master planned developments, specific plans, zone changes, and other "plan" level proposals.

The Thresholds Guide does not impact the existing discretionary authority of decisionmakers, although the guidance contained in it could provide more complete information to these decision-makers. The Thresholds Guide does not replace or invalidate the City's CEQA Guidelines, as it addresses the content of environmental documents as opposed to procedural requirements. It has no effect on the City's list of projects exempt from the CEQA process (see Article X of the City CEQA Guidelines, which lists project types eligible for categorical The *Thresholds Guide* can be used as a complement to existing department exemptions). procedures for processing CEQA documents, by building on the information in the CEQA Guidelines and providing technical assistance for the environmental analysis and determination of significance. The *Thresholds Guide* does not change the authority of the lead agency, as identified in the State CEQA Guidelines, to determine significance thresholds on a case-by-case basis dependent upon unique environments, evolving regulatory requirements, and the nature of projects encountered by each lead agency.

The guidance in the *Thresholds Guide* does not substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record, but is intended to provide sufficient flexibility to use the most appropriate criteria for a particular project. CEQA includes additional topics and requirements that are not addressed in the Thresholds Guide. The project evaluator and lead agency are still responsible for all CEQA requirements, whether or not they are discussed in the Thresholds Guide. The City CEQA Guidelines, the State CEQA Guidelines, and other references describe all of the requirements of the CEQA process and should be consulted if additional assistance is required.

As noted above, the fundamental purpose of CEQA is to publicly disclose and evaluate potential environmental impacts associated with proposed projects. As such, CEQA contains specific public notification and participation requirements. In addition, City policy in the General Plan Framework Element and a similar policy in the Transportation Element is to "assure that (sic) fair treatment of people of all races, cultures, incomes and education levels with respect to the development, implementation and enforcement of environmental laws, regulations, and policies, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in early planning stages through notification

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and two-way communication.¹" This assurance may involve efforts to identify and reach affected populations, including low-income communities and communities of color.

CONTENT AND USE

The *Thresholds Guide* presents two sets of criteria to evaluate project impacts: the screening and significance criteria. The screening criteria provide assistance in responding to Initial Study Checklist questions, and can help determine when further study is needed to decide whether a significant impact could potentially occur. Additional study (either in the context of an expanded Initial Study, negative declaration, or EIR) will assist project evaluators in determining whether the project impact falls above or below the significance threshold. The significance threshold identifies the level of impact over which mitigation (or a Statement of Overriding Considerations, if mitigation is not feasible) is required.

By defining screening criteria and significance thresholds, the *Thresholds Guide* provides guidance in determining the appropriate environmental document required for a project within the City of Los Angeles – negative declaration, mitigated negative declaration, or environmental impact report (EIR) – and whether a project's impacts would be presumed significant under normal circumstances, and therefore, require mitigation. The existence of screening criteria and significance thresholds may also encourage project proponents to incorporate impact-reducing measures into project designs, prior to submitting project applications to the City, to reduce potential impacts below the significance level.

The screening criteria and significance thresholds presented in the *Thresholds Guide* are based on a variety of factors, including existing local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards (common practice). Each threshold was then reviewed with respect to meeting the following goals: objectivity and applicability, defensibility, practicality, nexus between impacts and mitigation, and legal liability. This document, therefore, represents a compilation of existing information and practices and does not introduce new evaluation methods, nor does it diminish the value of independent judgment on the part of the project evaluator. However, the guidance provided in the *Thresholds Guide* can simplify the CEQA process by providing a consistent set of criteria applicable to most discretionary projects in the City. Because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the *Thresholds Guide*.

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City of Los Angeles, General Plan Framework Element, Policy 3.1.9, page 3-8.

There are three types of significance thresholds identified in the *Thresholds Guide*: quantitative, qualitative, and case-by-case (also called factors for consideration). Quantitative thresholds provide a measurable criterion with which to compare one or more characteristics of the proposed project, such as "the vehicle-to-capacity ratio increase at a study intersection is greater than 0.020." A qualitative threshold requires comparison to non-numerical criteria, such as "interference with a wildlife movement corridor." For some issue areas, a definitive threshold could not be established, either because the significance of impacts is specific to site conditions or project operations, or because there is no consistent technical guidance available. For these issues, the case-by-case thresholds provide factors for the project evaluator to consider, in light of specific project circumstances, in the determination of significance.

The Thresholds Guide does not identify thresholds for all issues found in the State's Initial Study Checklist, but focuses on those that are most commonly of concern throughout the City. In addition, the *Thresholds Guide* provides information on the topic of Shading, which is not listed in the Initial Study Checklist. It also provides expanded information on transportation issues, consistent with the City Department of Transportation's traffic study policies and procedures.

The impact resulting from a particular action depends on the project setting, design, and operational components. Therefore, the use of the Thresholds Guide may be appropriate for projects located within City boundaries under "normal" conditions, but there may be circumstances in which another set of criteria better applies to the proposed action or setting, and should be used for the determination of significance. For City-sponsored projects located outside City boundaries, City departments conducting CEQA review must consider the local environmental setting, as well as applicable regulations and policies, and determine if another set of criteria applies or is more appropriate.

Since conditions may vary depending upon the type of project and/or approval that is required, the lead City agency responsible for the implementation of CEQA for a particular project may develop internal departmental direction (e.g., thresholds), not inconsistent with the guidance in the *Thresholds Guide*, to address issues that commonly arise within the jurisdiction of that department. Project applicants should consult with the lead City department regarding any additional or further defined screening criteria or significance thresholds that may apply.

The case study and flowcharts in Exhibits 1-4 illustrate the process of using the screening criteria and significance thresholds, and how their use relates to the Initial Study Checklist and the impact evaluation process. The exhibits all assume that a project is not exempt from CEQA

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requirements. The case study (Exhibit 1) assesses operational noise impacts for four project types by posing a series of questions about each "project." This exercise concludes with an Initial Study evaluation and a determination of the type of CEQA document appropriate for that project. The flowcharts (Exhibits 2-4) describe the steps in conceptual terms, focusing on three phases of the CEQA process: 1) the Initial Study Checklist Process (using the screening and significance criteria to determine which boxes to check on the Checklist); 2) the Initial Study Determination (what type of CEQA document to prepare); and 3) the Impact Evaluation and Mitigation Process. The impact from a particular project may fall (a) below the screening criteria, (b) between the screening criteria and the significance threshold, or (c) above the significance threshold.

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Exhibit 1 CASE STUDY: OPERATIONAL NOISE

Initial Study Checklist Questions

X.a): Would the proposal result in increases in existing noise levels?

X.b): Would the proposal result in exposure of people to severe noise levels?

Initial Study Screening Criteria

- Would the proposed project introduce a stationary noise source that is likely to be audible beyond the property line of the project site?
- Would the project include 75 or more dwelling units or 100,000 square feet (sf) or greater of nonresidential development, or have the potential to generate 1,000 or more average daily vehicle trips (ADT)?

Significance Threshold

A project would normally have a significant impact on noise levels from project operation if the project causes the ambient noise level measured at the property line of an affected use to increase by 3 decibels (dBA) or more in community noise equivalency level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category of the noise exposure chart prepared by the California Department of Health Services (DHS), or any 5 dBA or greater noise increase.

Case	Introduce Stationary Source with Noise Emissions Audible Beyond Property Line?	Include more than 75 du, 100,000 sf nonresidential, or 1,000 ADT?	Increase in Ambient Level?	Increase Remaining After Mitigation	Initial Study Evaluation	Results/ Document Prepared
1	No	No	-	-	No Impact	Neg Dec
2	No	Yes	2 dBA	-	Less Than Significant Impact	Neg Dec
3	Yes	No	5 dBA	2.5 dBA	Potentially Significant Unless Mitigation Incorporated	Mitigated Neg Dec
4	Yes	Yes	7 dBA	5 dBA	Potentially Significant Impact	EIR

Notes: Assumes project is not exempt under CEQA.

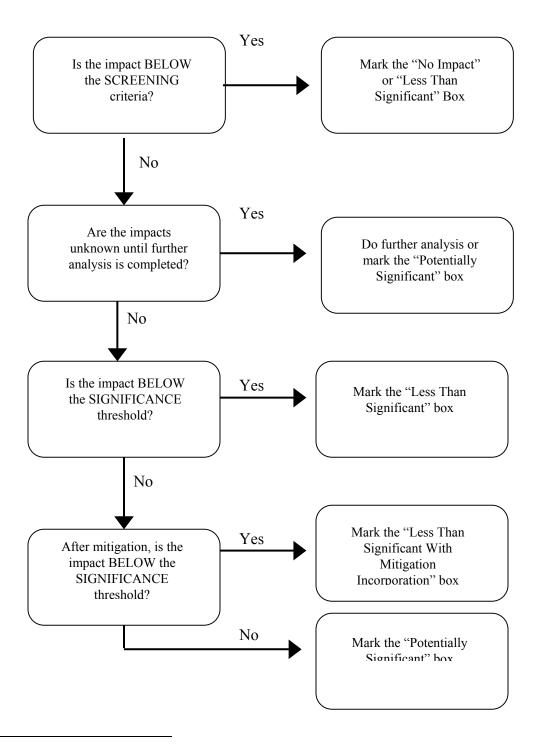
The noise exposure chart prepared by the DHS is reproduced in the *Thresholds Guide*.

If the noise level before and/or after mitigation is not known or cannot be determined, additional analysis could be undertaken prior to completing the Initial Study Evaluation or within an EIR.

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Exhibit 2 INITIAL STUDY CHECKLIST PROCESS*



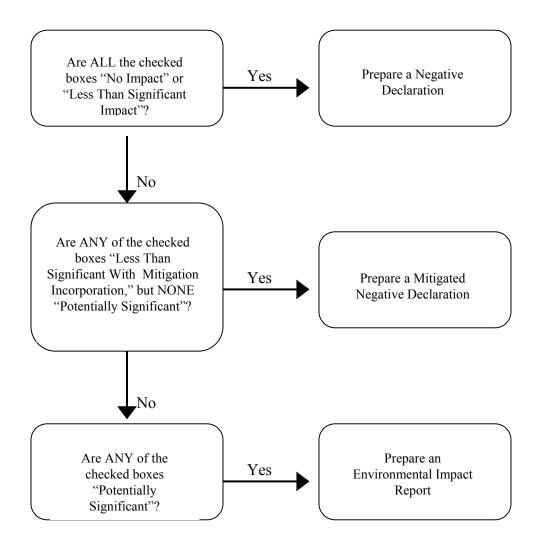
^{*} Assumes the project has had no previous review and is not exempt under CEQA.

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Exhibit 3 INITIAL STUDY DETERMINATION*



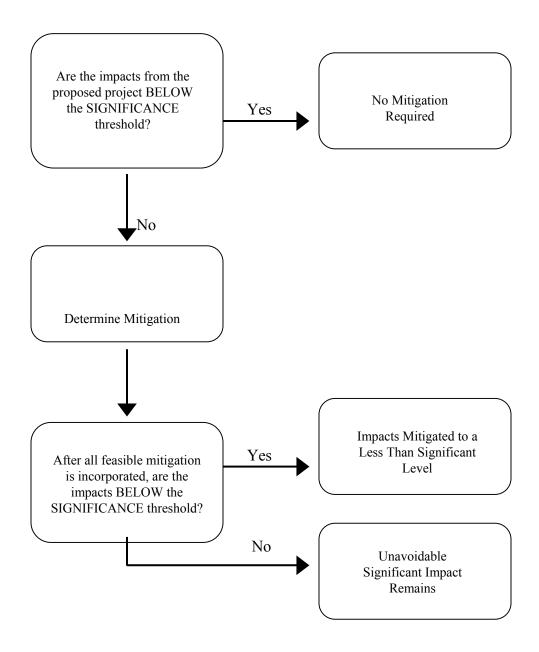
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^{*} Assumes the project is not exempt under CEQA.

Exhibit 4 IMPACT EVALUATION AND MITIGATION PROCESS



Note: If a project would result in one or more significant impacts, the lead agency, prior to project approval, must adopt certain findings as stated in CEOA Section 21081. Additional requirements related to mitigation measures are described in Section 21081.6.

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DOCUMENT STRUCTURE

The Los Angeles CEOA Thresholds Guide is arranged by issue area, generally in the same order in which the issues appear in the State's Initial Study Checklist. The major environmental categories covered in the document are as follows:

- Air Quality
- **Biological Resources**
- Cultural Resources
- Geology
- Hazards
- Land Use
- Noise

- Population and Housing
- **Public Services**
- **Public Utilities**
- Transportation
- Visual Resources
- Water Resources

For each environmental issue area, the following information is provided:

1. Initial Study Screening Process

Initial Study Checklist Question: This lists the question(s) from the State's Initial Study Checklist addressed within this issue area.

Introduction: The introduction provides a brief description of the issue area, including what types of project activities could be expected to have an impact, how the resource/issue would be affected, and important regulatory agencies and/or regulations.

Screening Criteria: The screening criteria assist in deciding when further study (additional review) is needed to determine whether a project impact could be significant. It assumes that the project is not exempt from CEQA requirements. Criteria are phrased as yes/no questions. For many issue areas, further study is recommended when one or more questions are answered with a "yes." A "no" response to all questions indicates that further study is not required, and there would normally be no significant impact from the proposed project on the subject issue.

Evaluation of Screening Criteria: This section contains any additional information needed to apply the screening criteria and identifies references that may be used in the evaluation

2. Determination of Significance

Significance Threshold: The significance threshold provides guidance in determining whether or not a project impact would be significant. The threshold assumes that a project

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exceeds the screening criteria. The quantitative and qualitative thresholds are phrased in the positive, so that if the project meets one or more of the criteria listed (a "yes" response), it would normally be considered to have a significant impact on the environment. Where a definitive threshold is not available, the *Thresholds Guide* provides case-by-case thresholds which consist of a list of conditions or criteria to be considered for an individual determination of significance.

<u>Environmental Setting</u>: This section identifies the type of information that is appropriate for a project setting or background section.

Project Impacts: This section provides a recommended methodology with which to analyze the proposed project, including the identification and evaluation of direct and indirect impacts, as appropriate, that may occur during construction or operation. It also identifies sources of relevant information and technical resources, and provides the basic steps to follow in the analysis. Impact methodologies are assumed to apply to both project level and plan level analyses unless otherwise specified. Other analysis methods may be appropriate, depending on project circumstances.

Cumulative Impacts: This section presents a method to evaluate cumulative impacts, based on either a related projects list or a planned development approach (the amount of overall growth expected for the project area, according to planning documents or forecasts, by the time of project completion). The methodology describes only the type of analysis that is appropriate and does not address the size or location of related projects to consider in the analysis. In cases where the methodology is the same as that for project impacts, the project impact section is referenced rather than repeating the information.

Sample Mitigation Measures: This section provides a sample list of measures that may be used to reduce project impacts. It does not address specific mitigation measures for certain project types, nor does it recommend or prioritize mitigation measures. Consideration of alternative projects (e.g., smaller scale, different uses) to reduce impacts is assumed to be part of the project alternatives analysis required in an EIR and is not included in the sample mitigation measures listed in the *Thresholds Guide*.

3. Data, Resources, and References

This section provides additional information related to the environmental issue. It may contain references to agencies or others with expertise in the subject area, reference documents, and selected legislation. For references that do not identify an agency or author, the entry refers to the City of Los Angeles. Several sections also provide exhibits and/or supplemental background information that illustrates or further explains concepts addressed in the section.

City of Los Angeles

L.A. CEQA Thresholds Guide
2006

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Interdepartmental CEQA Manual Subcommittee

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Building and Safety

Chief Legislative Analyst's Office

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Community Redevelopment Agency

Department of City Planning

Department of Transportation

Department of Water and Power

Environmental Affairs Department

Fire Department

Harbor Department

Housing Department

Los Angeles World Airports

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CTION		/S	St		ion
THRESHOLDS GUIDE SECTION	A	Aestruction of Views	Aesthetics Landform Alterations	A.1 Aesthetics A.3 Shading	(Glare Not Addressed) A.4 Nighttime Illumination
THRE	-	A.1 A.2	A.1 E.3	A.1 A.3	(Glare A.4
INITIAL STUDY CHECKLIST QUESTION	AESTHETICS: Would the project:	Have a substantial adverse effect on a scenic vista?	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Substantially degrade the existing visual character or quality of the site and its surroundings?	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?
Z	H	a)	b)	©	(p

INI	INITIAL STUDY CHECKLIST QUESTION	THRESHOLDS GUIDE SECTION
Ħ	AGRICULTURE 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 famland. Would the project:	(Agriculture Not Addressed)
Ħ	AIR OUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	
a)	Conflict with or obstruct implementation of the applicable air quality plan?	B.1 Construction EmissionsB.2 Operational EmissionsB.3 Toxic Air Contaminants
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	B.1 Construction EmissionsB.2 Operational EmissionsB.3 Toxic Air Contaminants

THRESHOLDS GUIDE SECTION	B.1 Construction EmissionsB.2 Operational Emissions	B.1 Construction EmissionsB.2 Operational EmissionsB.3 Toxic Air Contaminants	B.2 Operational Emissions		C. Biological Resources
INITIAL STUDY CHECKLIST QUESTION	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	d) Expose sensitive receptors to substantial pollutant concentrations?	e) Create objectionable odors affecting a substantial number of people?	IV. BIOLOGICAL RESOURCES: Would the project:	a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by California Department of Fish and Game or U.S. Fish and Wildlife Service?

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INI	INITIAL STUDY CHECKLIST QUESTION	THRE	THRESHOLDS GUIDE SECTION
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Ċ	Biological Resources
©	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal	Ċ.	Biological Resources
©	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?	Ú.	Biological Resources
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Ü	Biological Resources
Q	Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Ċ	Biological Resources

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	Historical Resources	Archaeological Resources	Paleontological Resources	Landform Alterations	Archaeological Resources	
	D.3	D.2	D.1	E.3	D.2	
V. CULTURAL RESOURCES: Would the project:	Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	Directly or indirectly destroy a unique paleontological resource or site or unique peologic feature?		Disturb any human remains, including those interred outside of formal cemeteries?	
	a)	b)	်		()	

RELATED SECTIONS IN L.A. CEQA THRESHOLDS GUIDE, continued

VI. GEOLOGIC PROBLEMS: Would the project:

- a) Expose people to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publications 42.

Geologic Hazards

E.1

- ii) Strong seismic ground shaking?
- iii) Seismic-related ground failure, including liquefaction?

Geologic Hazards

E.1

Geologic Hazards

E.1

Geologic Hazards

E.1

- iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- 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?
- E.2 Sedimentation and Erosion
 - E.1 Geologic Hazards

(p	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks of life or property?	Not Addressed
©	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?	E.3 Landform Alteration
VII.	VII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	F.1 Risk of Upset/Emergency Preparedness F.2 Human Health Hazards
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?	F.1 Risk of Upset/Emergency Preparedness F.2 Human Health Hazards
်	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	F.2 Human Health Hazards

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would it create a significant hazard to the public or the environment? For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working within the project area? [a) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? [b) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adiacent to urbanized areas or where residences are intermixed with wildlands?	F.2 Human Health Hazards	F.1 Risk of Upset/Emergency PreparednessK.2 Fire Protection & Emergency MedicalServices	F.1 Risk of Upset/Emergency PreparednessK.2 Fire Protection & Emergency MedicalServices	F.1 Risk of Upset/Emergency PreparednessK.2 Fire Protection & Emergency MedicalServices	K.2 Fire Protection & Emergency Medical Services
p) g c c c c	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would it create a significant hazard to the public or the environment?	For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working within the project area?	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
	Q	©	t)	ğ	h)

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		G.3 Groundwater Level	G.1 Surface Water Hydrology G.2 Surface Water Quality	G.1 Surface Water Hydrology
III. HYDROLOGY AND		with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onor off-site?	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
	a)	0	૽	ф

G.1 Surface Water Hydrology	G.3 Groundwater Level	G.1 Surface Water HydrologyG.2 Surface Water QualityG.3 Groundwater LevelG.4 Groundwater Quality	G.4 Groundwater Quality	G.1 Surface Water Hydrology G.3 Groundwater Level	E.1 Geologic Hazards G.3 Groundwater Level
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?	Otherwise substantially degrade water quality?	Place housing within a 100-year flood hazard area as mapped on a federal flood hazard Boundary or flood Insurance Rate Map or other flood hazard delineation map?	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Inundation by seiche, tsunami, or mudflow?
e	(J	(g	h)	<u>.</u>	(

	Land Use Compatibility	Land Use Consistency Land Use Compatibility	Land Use Consistency Land Use Compatibility		Mineral Resources	Mineral Resources
	H.2	H.1 H.2	H.1 H.2		E.4	E.4
IX. LAND USE AND PLANNING: Would the project:	Physically divide an established community?	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding mitigating an environmental effect?	Conflict with any applicable habitat conservation plan or natural community conservation plan?	MINERAL RESOURCES: Would the project:	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?	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, general plan, or other land use plan?
IX	a)	p)	်	×	a)	þ

Construction Noise Operational Noise Railroad Noise Airport Noise	Construction Noise Operational Noise Railroad Noise Airport Noise	Operational Noise Railroad Noise Airport Noise	Construction Noise Operational Noise Railroad Noise Airport Noise
1.1 2.1 1.3 1.4 1.4	1.1 1.2 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.4	1.2 1.3 4.1	1.1 2.1 4.1
Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above the existing without the project?
a)	b)	်	(p
	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or I.2 applicable standards of other agencies? I.3	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or 1.2 applicable standards of other agencies? 1.3 I.4 Exposure of persons to or generation of excessive groundborne 1.1 vibration or groundborne noise levels? 1.3 I.3	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or 1.2 applicable standards of other agencies? 1.4 Exposure of persons to or generation of excessive groundborne 1.1 vibration or groundborne noise levels? 1.3 A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? 1.3 Project vicinity above levels existing without the project? 1.3

Construction Noise Operational Noise Airport Noise		Population and Housing Growth	Population and Housing Growth Population and Housing Displacement	Population and Housing Displacement
1.1 1.2 1.4		J.1	J.1 J.2	J.2
For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	I. POPULATION AND HOUSING: Would the project:	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Displace substantial numbers of existing people, necessitating the construction of replacement housing elsewhere
t)	X	a)	b	ં
	11 21 41	1.1 1.2	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to 1.2 excessive noise levels? II. POPULATION AND HOUSING: Would the project: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to Excessive noise levels? 1. POPULATION AND HOUSING: Would the project: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? Displace substantial numbers of existing housing, necessitating the J.1 construction of replacement housing elsewhere?

Police Protection	Fire Protection & Emergency Medical Services	Police Protection	Public Schools	Recreation and Parks	Libraries
K 1	K.2	K.1	K.3	K.4	K.5
AIII. PUBLIC SERVICES: Would the project: a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the above public services:	Fire protection?	Police protection	Schools?	Parks?	Other public facilities?
a	<u>.</u>	ii)	iii)	iv	>

				,	0	
	Recreation and Parks	Recreation and Parks		Intersection Capacity Street Segment Capacity Freeway Capacity	In-Street Construction Impacts	Intersection Capacity Street Segment Capacity Freeway Capacity
	K.4	K.4		L.1 L.2 L.3	L.4 L.8	L.1 L.2 L.3
XIV. RECREATION:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the family would occur or be accelerated?	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?	XV. TRANSPORTATION/TRAFFIC: Would the project:	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume	to capacity tauto on toats, of congestion at intersections?	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?
×	a)	(q	×	a)		b)

G.1 Surface Water HydrologyM.2 Wastewater	M.1 Water	K.2 Wastewater	K.3 Solid Waste	M.3 Solid Waste
Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	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?	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Comply with federal, state, and local statutes and regulations related to solid waste?
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ELATED SECTIONS IN L.A. CEOA THRESHOLDS GUIDE, continued

SSHOLDS GUIDE, continued		All sections, particularly: C. Biological Resources D.1 Paleontological Resources D.2 Archaeological Resources D.3 Historical Resources	All Sections	Not addressed specifically, each section indirectly
RELATED SECTIONS IN L.A. CEQA THRESHOLDS GUIDE, continued	XVII. MANDATORY FINDINGS OF SIGNIFICANCE: Does the project:	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?
	×	a)	P	©

addresses

LIST OF ABBREVIATIONS/ACRONYMS

AASHTO American Association of State Highway and Transportation Officials

ACEC Areas of Critical Concern ACM asbestos-containing material

ACOE United States Army Corps of Engineers

ADT average daily traffic AEM Area Equivalent Method

AEP Association of Environmental Professionals

AF acre feet

AQMP Air Quality Management Plan AQ-TAN Air Quality Technical Analysis Note

ARMR Archaeological Resource Management Reports

ASTM American Society of Testing Methods
ATSAC Automated Traffic Surveillance and Control
AVORS Additional Valley Outfall Relief Sewer

AVR average vehicle ridership

BACM Best Available Control Measures
BACT Best Available Control Technologies

Basin South Coast Air Basin
BLM Bureau of Land Management
BMP best management practices

CAA Clean Air Act

CAAA Clean Air Act Amendments CAC California Administrative Code

CAL3QHC air quality model

California Register California Register of Historical Resources

CALINE/4 air quality model

CalOSHA California Occupational Safety and Health Administration

Caltrans California Department of Transportation

CAP Clean Air Program

CAPCOA California Air Pollution Control Officers Association

CARB California Air Resources Board
CBD Central Business District
CCAA California Clean Air Act
CCR California Code of Regulations

CCSCE Center for the Continuing Study of the California Economy

CDD Community Development Department
CDFG California Department of Fish and Game
CDMG California Division of Mines and Geology

CEQ Council of Environmental Quality
CEQA California Environmental Quality Act

CFR Code of Federal Regulations CGC California Government Code

CHAS Comprehensive Housing Affordability Study

CHC Cultural Heritage Commission
CIP Capital Improvement Program
CIS Coastal Interceptor Sewer

CiSWMPP City Solid Waste Management Policy Plan
CIWMB California Integrated Waste Management Board

CMA Critical Movement Analysis
CMP Congestion Management Program
CNDDB California Natural Diversity Data Base
CNEL Community Noise Equivalent Level
CNPS California Native Plant Society

CO carbon monoxide COS Central Outfall Sewer

CRA Community Redevelopment Agency
CRV California Redemption Value

cu.yd. cubic yards
CWA Clean Water Act
CWC California Water Code
demand to capacity

dB decibel

dBA A-weighted decibel scale
DFO Designated Federal Official
DHS Department of Health Services

DMV California Department of Motor Vehicles

DOF Department of Finance

DOT United States Department of Transportation

DWP Department of Water and Power
DWR Department of Water Resources
EAD Environmental Affairs Department

EDI City of Los Angeles Environmental Data Index

EIR Environmental Impact Report
EIS Environmental Impact Statement

EMFAC emission factors

EPA U.S. Environmental Protection Agency

ERCs Emission Reduction Credits
EVIS East Valley Interceptor Sewer
FAA Federal Aviation Administration
FAR Federal Aviation Regulation

FEMA Federal Emergency Management Agency

FHWA Federal Highway Administration FIRM Flood Insurance Rate Maps

FLMPA Federal Land Management and Policy Act of 1976

gpcd gallons per capita per day

gpdgallons per daygpmgallons per minuteGr.sq.ft.gross square feetgsfgross square feet

HABS Historic American Building Survey

HAPs Hazardous Air Pollutants

HI hazard index

HNM Helicopter Noise Model HOV high occupancy vehicles

HPOZ Historic Preservation Overlay Zone

HRA health risk assessment
HSC Health and Safety Code
HTP Hyperion Treatment Plant

HUD Department of Housing and Urban Development

HVAC heating, ventilation, and air conditioning

ICO interim control ordinance INM Integrated Noise Model

ISWM Integrated Solid Waste Management
ISWMO Integrated Solid Waste Management Office
ITE Institute of Transportation Engineers

IWG Interagency Working Group

L.A. Los Angeles

LACMTA Los Angeles County Metropolitan Transportation Authority

LADOT Los Angeles Department of Transportation

LAFD Los Angeles Fire Department

LAGWRP Los Angeles-Glendale Water Reclamation Plant

LAMC Los Angeles Municipal Code LAPD Los Angeles Police Department LAPL Los Angeles Public Library

LARWOCB Los Angeles Regional Water Quality Control Board

LAUSD Los Angeles Unified School District LAX Los Angeles International Airport

Ldn Day-Night Sound Level

LEOV2 noise model

LGC Local Government Commission

LOS level of service

LUPAMS Land Use Planning and Mapping System LUST leaking underground storage tank

MAAQI Mobile Assessment for Air Quality Impacts
MACT Maximum Achievable Control Technology

MFI Median Family Income mgd million gallons per day

MOU Memorandum of Understanding

mph miles per hour

MPO Metropolitan Planning Organization

MRZ Mineral Resource Zone

MUTCD Manual on Uniform Traffic Control Devices
MWD Metropolitan Water District of Southern California

NAAQS National Ambient Air Quality Standard

NAGPRA Native American Graves Protection and Repatriation Act of 1990

National Register National Register of Historic Places

NCHRP National Cooperative Highway Research Program NCOS-NOS North Central Outfall Sewer-North Outfall Sewer

NEJAC National Environmental Justice Advisory Council

NEPA National Environmental Policy Act

NESHAPs National Emissions Standards for Hazardous Air Pollutants

NO₂ nitrogen dioxide NOP Notice of Preparation

NORS North Outfall Replacement Sewer

NOS North Outfall Sewer

NOS-LCSFVRS North Outfall Sewer-La Cienega, San Fernando Valley Relief Sewer

NO nitrogen oxides

NPDES National Pollutant Discharge Elimination System

NPS National Park Service

NSPS New Source Performance Standard

NSR New Source Review

OEJ Office of Environmental Justice

OHP California Office of Historic Preservation

OPR Office of Planning and Research

OSHA Occupational Safety and Health Administration

Pb lead

 $\begin{array}{ll} \text{PM} & \text{particulate matter} \\ \text{PM}_{10} & \text{coarse particulates} \\ \text{PM}_{25} & \text{fine particulates} \end{array}$

POD Pedestrian Oriented District
PRC Public Resources Code

RACM Reasonably Available Control Measures RCP&G Regional Comprehensive Plan and Guide

RD Reporting District

RECLAIM Regional Clean Air Incentives Market

ROG Reactive Organic Gas

ROW right-of-way

RTCs RECLAIM Trading Credits

RTIP Regional Transportation Improvement Program

RTP Regional Transportation Plan

RWQCB Regional Water Quality Control Board SANDAG San Diego Association of Governments

SCAG Southern California Association of Governments SCAQMD South Coast Air Quality Management District

SEA Significant Ecological Area

sf square feet

SIP State Implementation Plan SMGB State Mining and Geology Board

SO₂ sulfur dioxide

SOCAB South Coast Air Basin

SOUND32 noise model

SOV single occupant vehicle

SO_x sulfur oxides sq.ft. square feet

SRRE Source Reduction and Recycling Element
TDM Transportation Demand Management
The Gas Company
Southern California Gas Company
TIA Transportation Impact Assessment
TITP Terminal Island Treatment Plant

TOD Transit Oriented District

TRB Transportation Research Board
TSM Transportation System Management

TSP Transportation Specific Plan

TWRP Donald C. Tillman Water Reclamation Plant

U.S. United States

UCLA University of California at Los Angeles

ULARA Upper Los Angeles River Area

ULI Urban Land Institute
USAF United States Air Force
USFS United States Forest Service

USFWS United States Fish and Wildlife Service

USGS United States Geological Survey

V/C Volume to Capacity

VOC Volatile Organic Compound WDR Waste Discharge Requirements

ZI Zoning Information

GLOSSARY

Alternatives - A range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the project's objectives but would avoid or substantially lessen any of the significant effects of the project. The comparative merits of the alternatives are evaluated in an EIR or EIS.

Applicant - A legal entity or person who proposes to carry out a project and needs a lease, permit, license, certificate, or other entitlement for use, or who is requesting financial assistance from one or more public agencies to carry out a project.

Approval - The action by a decisionmaking body, which commits the City to a definite course of action with regard to a project, intended to be carried out by any person.

California Environmental Quality Act (CEQA) - Statute enacted by the California legislature contained in the California Public Resources Code, Section 21000 et seg. The Thresholds Guide provides guidance on the determination of significant impacts, one provision of CEQA.

California Law - California Law consists of 29 codes, covering various subject areas, the State Constitution and Statutes. Codes included the following: Business and Professions Code, Civil Code, Code of Civil Procedure, Commercial Code, Corporations Code, Education code, Election Code, Evidence Code, Family Code, Financial Code, Fish and Game Code, Food and Agricultural Code, Government Code, Harbors and Navigation Code, Health and

Safety Code, Insurance Code, Labor Code, Military and Veterans Code, Penal Code, Probate Code, Public Contract Code, Public Resources Code, Public Utilities Code, Revenue and Taxation Code, Streets and Highways Code, Unemployment Insurance Code, Vehicle Code, Water Code, and Welfare and Institutions Code.

Categorical Exemption - An exemption from the requirements of CEQA based on a finding by the Secretary For Resources and the Los Angeles City Council that certain types of projects do not have a significant effect on the environment.

CEOA Guidelines - The CEOA Guidelines agencies with criteria procedures for the evaluation of projects and the preparation of environmental documents. The State CEQA Guidelines are contained in Title 14, Division 6 of the California Administrative Code. The Los Angeles City CEQA Guidelines are adopted by ordinance of the City Council.

Code of Federal Regulations (CFR) - is a codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal Government. The CFR is divided into 50 titles, which represent broad areas subject to Federal regulation. Each title is divided into chapters, which usually bear the name of the issuing agency. Each chapter is further subdivided into parts covering specific regulatory areas. Large parts may be subdivided into subparts.

Community Plan – A portion of the General Plan that focuses on the setting and

needs of a particular area. It supports the policies of the General Plan. Los Angeles has 35 Community Planning Areas. The 35 Community Plans make up the City's Land Use Element.

Decision-Making Body - A group or individual having project approval authority.

Discretionary Project - An activity defined as a project which requires the exercise of judgment, deliberation, or a decision on the part of the public agency or body in the process of approving or disapproving a particular activity, as distinguished from activities where the public agency or body merely has to determine whether there has been compliance with applicable statutes, ordinances, or regulations.

Entitlement - Used to describe discretionary land use approval granted by the Planning Department. Includes Zone Variances, Zone Changes, Conditional Use Permits, General Plan Amendments, Specific Plan Exceptions, Subdivisions, Parcel Maps, and Site Plan Review.

Environment - Environment, for the purposes of implementing CEQA, is the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Environmental and Public Facilities Maps - Show the location of and describe various environmental features and public facilities. The City Planning Department Citywide Division prepared the 42 maps in 1996.

Environmental Assessment Form (EAF) - An environmental form submitted to the

Environmental Review Section of the City Planning Department which provides the necessary information to determine the recommended environmental clearance for projects requiring any discretionary action.

Environmental Data Index (EDI) – The EDI is a citywide tabular report describing the geographical distribution of a wide array of environmental characteristics on a census tract basis. Data for 30 environmental elements are included. The City Planning Department prepared the EDI in 1978.

Environmental Documents-Environmental documents, according to CEQA, include Initial Study, Negative Declaration, draft and final EIR, Joint EIR/EIS, Notice of Preparation and General Exemption, Notice of Completion, Notice of Determination, and Notice of Exemption.

Environmental Impact Report (EIR) - An Environmental Impact Report is a concise statement setting forth the environmental effects and considerations pertaining to a project as specified in Section 21100 of CEQA.

Environmental Impact Statement (EIS) - An Environmental Impact Statement may be required pursuant to the National Environmental Policy Act (NEPA) if a federal agency or funding is involved. Like an EIR, an EIS describes the environmental impacts of a proposed project and its alternatives.

Feasible - Feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

Federal Register – The Federal Register is the official daily publication for Rules, Proposed rules, and Notices of Federal agencies and organizations, as well as Executive Orders and other Presidential Documents.

Framework Element – This strategy for long-term growth sets a citywide context to guide the update of the Community Plans and citywide elements of the General Plan. The Framework Element refines adopted City policy and updates and supersedes Concept Los Angeles, a strategy to preserve residential neighborhoods by focusing growth into centers. Approved by City Council in December 1996.

General Exemption - An exemption from the requirements of CEQA is granted if it can be seen with reasonable certainty that the project in question could not possibly have a significant effect on the environment.

General Plan - A "blueprint" for future development with a long-term outlook. Required by State law to be prepared by each county and city and include seven elements: land use, circulation, housing, conservation, open space, noise, and safety. also include optional elements. Includes policies, goals, objectives, and programs. Development must not only meet specific zoning requirements, but also the broader policies, goals and objectives set forth in the General Plan. The City's General Plan is organized into the following Elements: Framework; Land Use; Air Ouality: Transportation: Housing: Infrastructure Systems; Open Space and Conservation; Noise; Public Facilities and Services: Historic Preservation and Cultural Resources; Safety; and Urban Form and Neighborhood Design.

Initial Study - A comprehensive analysis of those aspects of the environment, which could potentially affect a project or be affected by a project conducted to determine whether a project may have a significant effect on the environment.

Lead Agency - The public agency which has the principal responsibility for carrying out or approving a project. The Lead Agency will prepare the environmental documents for the project either directly or by contract.

Lead City Agency - A Lead City Agency is the City department, bureau, division, section, office, or agency which has the principal responsibility of carrying out a project which is subject to the provisions of CEQA, or has the principal responsibility for processing the application for a lease, permit, license, or other entitlement for use for a project which is subject to the provisions of CEQA. If more than one City Agency meets the Lead City Agency criteria, the Lead City Agency shall be the City Agency that normally acts first on such projects.

Ministerial Project - Activities undertaken by public agencies pursuant to a statute, ordinance, or regulation that sets forth the conditions upon which the undertaking must or must not be granted. A ministerial decision involves only the use of fixed standards or objective measurements without professional judgment.

Mitigated Negative Declaration (MND) - When significant impacts may occur as a result of the implementation of a project, but mitigation and/or project modification reduce impacts to a less than significant level, then a Mitigated Negative Declaration

is issued with discussion and conditions attached.

Mitigation - Mitigation includes avoiding the impact altogether by not taking a certain action or parts of an action; minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or compensating for the impact by replacing or providing substitute resources or environments.

National Environmental Policy Act (NEPA) - The National Environmental Policy Act is the federal law requiring an environmental assessment for federal actions that involve impacts on the environment. NEPA is set forth in 42 U.S.C.A. 4321 et seq.

Negative Declaration (ND) - A statement by the Lead Agency briefly setting forth the reasons why the project, although not otherwise exempt, will not have a significant effect on the environment and therefore does not require the preparation of an EIR.

Notice of Completion (NOC) - A brief notice filed with the State Clearinghouse in the Governor's Office of Planning and Research by a Lead Agency as soon as it has completed a draft EIR and is prepared to send out copies for review.

Notice of Determination (NOD) - A public notice filed with the City and County Clerk by the Lead City Agency after a project subject to the provisions of CEQA and involving a Negative Declaration, Mitigated

Negative Declaration or an EIR has been approved.

Notice of Exemption (NOE) - A public notice which may be filed with the City and County Clerk by a Lead City Agency after the decision-making body has approved a project and has determined that it is a ministerial, categorically exempt, or emergency project, or is otherwise exempted pursuant to the provisions of Section 21080 (b) of the California Public Resources Code.

Notice of Preparation (NOP) - A brief notice sent by a Lead City Agency to notify Responsible Agencies and interested parties that the Lead City Agency plans to prepare an EIR for a proposed project.

Office of Planning and Research (OPR) the understanding Assists in implementation of CEQA by (1) preparing and updating the State CEQA Guidelines; (2) evaluating Categorical Exemptions; (3) distributing documents to state agencies through the State Clearinghouse; coordinating between other public agencies: (5) preparing and distributing publications related to the understanding and use of CEOA.

Participating City Agency - A City department, bureau, division, section, office, officer, or agency, which is required by Charter or action of the City Council to review a particular class of projects and make comments or recommendations to the Lead City Agency.

Responsible Agency - A public agency, such as a city or county, which proposes to carry out or has approval power over a project, but is not the Lead Agency for the project.

Significant Effect - A substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the proposed activity including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. This *Thresholds Guide* is intended to assist in the determination of significant effects.

Specific Plan – describes the allowable land uses, identifies open space, and details infrastructure availability and financing for a portion of a community. Specific plans implement, but are not technically a part of the General Plan. Los Angeles has various specific plans throughout the City, such as West Los Angeles, Warner Center, etc.

State Clearinghouse - In the Governor's Office of Planning and Research. Responsible for distributing environmental documents to state agencies, departments, boards, and commissions for review and comment. Coordinates the responses to ensure accurate and consistent responses from the state.

Statement of Overriding Considerations - A statement with findings identifying public objectives that, in the opinion of the decision-making body, warrant approval of a project notwithstanding its significant adverse impact(s) on the environment.

Statutory Exemption - Exemption from the requirements of CEQA based on the determination by the California Legislature that a specific type of project should be exempt from CEQA.

Zoning – The purpose of zoning regulations is to implement the policies of the General Plan. Zoning lists the kinds of uses allowed on a parcel and sets standards such as

minimum lot size, maximum building height, and minimum front yard depth. Zoning must comply with the general plan, is adopted by ordinance, and carries the weight of local law. The City's Zoning is found in Chapter 1 of the Los Angeles Municipal Code (LAMC).

A. AESTHETICS AND VISUAL RESOURCES

City of Los Angeles 2006

A. AESTHETICS AND VISUAL RESOURCES

INTRODUCTION

Aesthetics, views, shading, and nighttime illumination issues are related elements in the visual environment. Aesthetics generally refer to the identification of visual resources and the quality of what can be seen, or overall visual perception of the environment. Views refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic view from an area. Shading issues are concerned with effects of shadows cast by existing or proposed structures on adjacent land uses. Nighttime illumination addresses the effects of a proposed project's exterior lighting upon adjoining uses.

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A.1. AESTHETICS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- Would the project have a substantial adverse effect on a scenic vista?
- I.b): Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Would the project substantially degrade the existing visual character or quality of the site I.c): and its surroundings?

B. Introduction

Aesthetic impact assessment generally deals with the issue of contrast, or the degree to which elements of the environment differ visually. Aesthetic features occur in a diverse array of environments, ranging in character from urban centers to rural regions and wildlands. Adverse visual effects can include the loss of natural features or areas, the removal of urban features with aesthetic value, or the introduction of contrasting urban features into natural areas or urban settings.²

Natural features may include, but are not limited to: open space; native or ornamental vegetation/landscaping; topographic or geologic features; and natural water sources. The loss of natural aesthetic features or the introduction of contrasting urban features may have a local impact, or, if part of a larger landscape, may contribute to a cumulative decline in overall visual character.

Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or

Visual contrast has four components: form, line, color and texture. Differences in these elements generate visual contrast. The Bureau of Land Management (BLM) (Contrast Rating System), Soil Conservation Service (Visual Absorption Capability), and Federal Highway Administration (FHWA) (Visual Absorption Capacity) all utilize established qualitative and quantitative methods to measure potential visual impacts and the ability of natural areas to absorb visual impacts.

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park areas; etc. Aesthetic character may be purposely generated, nurtured or preserved, as is the case with City-designated scenic corridors and historical districts, or may exist without such cause or purpose, such as may be the case with certain retail districts or residential neighborhoods.

The introduction of contrasting features or development into aesthetically valued urban areas can overpower familiar features, eliminate context or associations with history, or create visual discord where there have been apparent efforts to maintain or promote a thematic or consistent character.

There is an extraordinary range of aesthetic characteristics and contrasts within the City of Los Angeles, including suburban neighborhoods, dense urban areas, the Port, airports, and hillside residential areas. Given the size and diversity of the City, there are no aesthetic standards that apply to all areas. However, the Community Plan and any applicable specific plan, local coastal plan, or redevelopment plan may contain specific guidelines and requirements related to aesthetics. General aesthetic requirements that apply to individual zoning districts or to types of land uses are provided in the Los Angeles Municipal Code (LAMC). Selected requirements, including the Landscape Ordinance, are included in Exhibit A.1-1. While certain screening and significance thresholds can be identified for this issue, a degree of discretionary judgment may be required to determine the "value" of the aesthetic resource and potential project impacts.

C. Screening Criteria

- Does the project include a proposed zone change or variance that would increase density, height, and bulk in areas where there is a consistent theme, style, or building height and setbacks?
- Does the project include a proposal to develop or allow development in an existing natural open space area (not including previously developed or infill lots)?
- Would the project result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area?
- Would the project introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines?

See C. BIOLOGICAL RESOURCES, as appropriate.

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Aesthetics, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Aesthetics from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, including drawings or renderings. Features that contribute to a valued aesthetic image may include, but are not limited to: structures of architectural or historical significance or visual prominence; public plazas, art, or gardens; heritage oaks or other trees protected by the City; or other features of recognized value to the aesthetic or visual character of an area. Projects that detract from the existing aesthetic quality of an area may include, but are not limited to, major contrasts in building height and bulk (e.g., buildings "too big" for a street), excessive vegetation loss or grading of slopes in natural areas, introduction of high rise structures in low density areas, etc. Compare the project features with the existing characteristics of the project site and the surrounding area. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Identification and description of the natural or built feature(s) that gives the existing neighborhood/local area its valued aesthetic character or image;
- Summary of adopted plans or policies that relate to the aesthetics of the project area, such as those found in a specific plan, Redevelopment Plan, local coastal plan, the Community Plan, or the Planning and Zoning Code, including the Landscape Ordinance; and
- Description of any feature on the project site or in the surrounding area that is listed, designated or otherwise recognized by the City (e.g., a scenic corridor, historic district, heritage oak trees).

Project Impacts

Based on the project description, and a review of the project site and surrounding area, identify the degree to which the proposed project would result in the loss, removal, alteration, or destruction of any existing natural or urban aesthetic feature(s) that contributes to the valued aesthetic character of the area. In addition, identify the major features of the proposed project that would be added to the site, including building heights, bulk, setbacks, architectural style, or any proposed zone changes or variances. Evaluate the degree to which the introduction of new features or the loss of existing aesthetic elements would alter, degrade, or contrast with the existing valued aesthetic character of the area.

Examples of contrast in areas where there is a consistent architectural theme, style or other aesthetic character could include, but are not limited to, the following:

- The project's architectural style, building materials, massing, or size would contrast with adjacent development, such that the value or quality of the area is diminished;
- The project would cause or contribute to a change in the overall character of the area (e.g., from residential to commercial, single-family to multi-family, etc.) and/or new development would contrast with existing architectural styles or themes; and
- The project would grade or remove open space or natural lands and introduce contrasting built features.

Cumulative Impacts

Review the list of related projects and identify those projects that would result in the removal, alteration, or destruction of similar aesthetic features as the proposed project, and/or would add structural or other features that would contrast conspicuously with the valued aesthetic character of the same area as the project. Consider both natural and built features that give the area its image or character. Determine whether the impact of the related projects, in combination with the proposed project, would result in a significant aesthetic impact, using the methodology described above.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Replace existing natural aesthetic features proposed for removal;
- Minimize grading of natural and semi-natural open space;
- Modify structure design to eliminate or screen contrasting/detracting features;
- Consider adaptive reuse of important existing structures;
- Place new utilities underground, where appropriate;
- Incorporate policies and/or design which effectively integrates natural aesthetics into the project (i.e., cluster development, greenbelts, landscaping, etc.);

- Utilize architectural styles, materials, scale, massing, setbacks, signage, circulation patterns, pedestrian orientation, streetscape amenities, and landscaping common to and/or consistent with the character of existing surrounding uses;
- Continue the existing aesthetic treatments along the frontage of new structures (such as street furniture, landscaping, street trees, parks, or pedestrian-oriented walks);
- Screen roof and mechanical equipment, garbage dumpsters, and equipment from public view; and
- Use building styles and finishes that integrate effectively with the natural terrain.

See also the Landscape Ordinance for additional suggestions.

DATA, RESOURCES, AND REFERENCES

City of Los Angeles General Plan, including Framework Element, Draft Open Space and Conservation Element, Scenic Highways Plan of the Circulation Element, District Plans, Community Plans, and Local Coastal Program. Plans are available from the City Planning Department's Central Maps and Publications office at 200 N. Spring St., 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255.

LAMC, Chapter 1, Planning and Zoning Code. Available from the Central Maps and Publications Office (see above), on http://www.lacity.org/PLN/

Landscape Ordinance, No. 170,978 as amended, and Guidelines to Implement the Landscape Ordinance. Available from the Central Maps and Publications Office (see above).

See also C. BIOLOGICAL RESOURCES; and D.3. HISTORICAL RESOURCES

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Exhibit A.1-1

SELECTED AESTHETIC-RELATED REGULATIONS IN THE LOS ANGELES **MUNICIPAL CODE**

<u>Chapter 1, Article 2, Sec. 12.21.1</u>. Building heights and setbacks shall not exceed the maximum heights identified per zoning district in this section.

Chapter 4, Article 6. Oak trees meeting certain requirements shall be relocated or replaced. Oak tree reports shall be prepared for tentative map approval.

Chapter 1, Article 7, Sec. 17.05 S, and T. The Mulholland Scenic Parkway and Valley Circle Boulevard - Plummer Street Scenic Corridor shall have trails along the roadways, which meander within a landscaped parkway. Signs and road related fixtures in the corridor areas to be of a design to blend with the scenic environment. Attractive masonry walls or landscaping shall provide screening of adjacent developments.

Chapter 1, Article 7, Sec. 17.08 F. Subdividers shall either plant street trees or make cash payments for such plantings.

Chapter 1, Article 2, Sec. 12.22 A 23. Mini-shopping centers shall construct a six-foot masonry wall along residential zones and trash storage areas. Three-foot high decorative screening walls or hedges shall be constructed between parking areas and sidewalks/parkways. All center street frontages will include a landscaped setback. At least 5 percent of surface parking areas shall be Street frontages and parking areas shall be planted with shade trees. Off-site commercial signs, flashing signs, pole signs or roof signs are prohibited.

Chapter 1, Article 2, Sec. 12.21 A 6(d) and (e), and (i). Public and private parking areas shall be enclosed by a wall, except in the "M2" and "M3" Zones, along an alley, public parking area, or a "P", PB", "C" or "M" Zone. Unimproved or non-parking portions of parking lots shall be landscaped.

Chapter 1, Article 2, Sec. 12.21.1 A 3 (See also Division 62). Restrictions on the number, size and location of parking area signs within "P" and "CR" Zones. Sign plans shall be submitted with applications for signs. Prohibited signs shall include posters, pennants, or banners, flashing signs or signs.

Chapter 1, Article 2, Sec. 12.14 A, and Sec. 12.17 A 3(b), and Sec. 12.17.1 A 2(b)(4). The display/storage of merchandise within the "C2", "C5" and "CM" Zones shall be confined to the rear of the lot as measured from street frontages.

Chapter 1, Article 2, Sec. 12.13.5 A 3, and Sec. 12.14 A, and 12.14A, and Sec. 12.18 B 5(b) and (d). All activities, including storage, in the "C1.5" Zone, and certain activities in the "C2" Zone, shall be conducted wholly within an enclosed building. Auto stations in the "C2" Zone shall have a six-foot

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high wall along lot lines, which abut "A" or "R" Zones. Open storage areas in the "MR2" Zone shall be enclosed on all sides with a solid wall not less than eight feet in height sufficient to screen the use from public view.

<u>Chapter 1, Article 2, Sec. 12.19 A 1(4)(2), and 12.20 A 1(e)</u>. Automobile dismantling yards, junkyards and certain types of storage in the "M2" or "M3" Zones shall be enclosed within a building or an eight-foot solid masonry wall.

<u>City of Los Angeles Landscape Ordinance, No. 170,978, as amended, and Guidelines</u>. Updates the City's requirements for landscaping at new buildings, based on a point system.

A.2. OBSTRUCTION OF VIEWS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

The term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Focal views" focus on a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.

The State of California and the City of Los Angeles have recognized the value of access to visual resources through planning and zoning regulations, which designate, preserve, and enhance public views. Through the General Plan, Community Plans, and the designation of scenic resources, the City specifies development standards, which help prevent the obstruction of views. These standards include the regulation of building height, mass, and floor to area ratio, as well as landscaping and grading, which are the principal issues in view obstruction. Individual specific or master plans may include additional standards such as view-sensitive site planning, structure design and grading requirements, transfer of development rights to avoid development in sensitive viewsheds, and preservation of mountain ridges and other visual resources to minimize obstruction of views.

Structures and other elements (e.g., towers, buildings, walls, signs, manufactured slopes, and landscaping) constructed or added as part of a project may obstruct focal or panoramic views. (To

See California Government Code Section (CGC) 65302, which permits the Land Use Element of a General Plan to make provision for protection of aesthetic resources and views; Nollan v. California Coastal Commission, 483 U.S. 825 (1987) where view protection was identified as a legitimate government interest; and the 1979 Scenic Highway Plan where views of aesthetic resources are identified as meriting protection and enhancement.

evaluate the aesthetic impact of a particular element, see A.1. AESTHETICS.)

C. Screening Criteria

- Would the project occur within or adjacent to a valued focal or panoramic vista or within view of any designated scenic highway, corridor, or parkway?
- Would the project obstruct, interrupt, or diminish a valued focal and/or panoramic view?
- Does the project propose standards for height and bulk of structures and other elements that inadequately protect existing visual resources and/or views?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Thresholds for Obstruction of Views, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the above questions indicates that there would normally be no significant impact on Views from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. Review the Scenic Highways Plan, the applicable Community Plan, and the Los Angeles Municipal Code (LAMC), if necessary, to determine whether the project site is located in or near a designated scenic area or contains any identified scenic vistas. Also, review applicable zoning ordinances, interim control ordinances (ICOs), specific plans, or other plans applicable to the project site to determine potential viewsheds or vistas, specific criteria concerning viewshed impact mitigation, as well as height and bulk requirements. Assess whether existing views would be obstructed, interrupted, or diminished by structures or other vertical elements constructed as part of the proposed project. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

• The nature and quality of recognized or valued views (such as natural topography, settings, man-

made or natural features of visual interest, and resources such as mountains or the ocean);

- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

B. Methodology to Determine Significance

Environmental Setting

Characterize the existing view environment of the project site and surrounding vicinity (e.g., cityscape or open space, undeveloped or urbanized, existence of any water elements, etc.). Describe the site and surrounding area with respect to existing land uses, topography, landforms, location within or proximity to scenic highways or corridors and natural or built areas of scenic value. Identify and characterize existing views of the project site and valued views from the site. Note whether views are limited or unique, and identify the visual elements associated with the view. Use photographs and/or drawings, as appropriate (see Exhibits A.2-1 and A.2-2).

Project Impacts

Using the information from the Evaluation of Screening Criteria and Environmental Setting, determine the nature and quality of any key visual components identified. Identify project elements that would obstruct or interrupt existing views and the probable extent to which views would be impacted. Obstructing or interrupting views from a designated scenic highway, corridor, or parkway would likely be viewed as an adverse impact.

To determine the extent to which a project would affect views available from along a public roadway, bike path, trail, or other view corridor, and from single, fixed vantage points, identify the areas from which the project is visible. Consider whether and to what degree the project could impact views from these locations.

View obstruction may be determined with view sections, field of view analysis, line-of-sight analysis, or other appropriate method (see Exhibits A.2-3 and A.2-4, and 3. Data, Resources, and References).

For long-range programs or projects that propose policy changes, where specific structure

designs (i.e., elevations and/or building footprints) have not been identified, use the maximum development envelope (i.e., maximum heights, minimum setbacks, maximum lot coverage, and maximum contiguous floorplate) permitted according to the applicable zoning.

Cumulative Impacts

Review the list of related projects and identify those that would affect the same view opportunities as the project. Using the same methodology as described above for Project Impacts, discuss the combined visual impact of the project plus related projects on the identified view opportunities.

Sample Mitigation Measures

Projects are required to comply with the view preservation requirements (i.e., limits on structure location, height and massing, controls on landscaping and grading) of the Scenic Highway Plan. Compliance with the siting and development standards of the General Plan, Community Plans, specific plans, other applicable plans, zoning ordinances and ICOs is also required. Potential mitigation measures include the following:

- Design structures to conform to the existing natural terrain (e.g. multi-level structures on hillsides which are "stepped" in line with the slopes);
- Reduce the width and/or height of new structures to reduce the extent of obstruction;
- Design street networks to minimize view obstruction and/or enhance existing views;
- Locate new structures on portions of the site that do not interfere with existing views;
- Use open space areas to minimize view obstruction and/or enhance existing views; and
- Transfer buildable floor area from a view impacted area to a non-view impacted area on the same or different site. Requires preparation and City approval of a transfer of floor area plan in accordance with Ordinance 163,617; or apply for density transfer to floor area averaging in accordance with City procedures.

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3. DATA, RESOURCES, AND REFERENCES

City Planning Department, 201 North Figueroa Street, 3rd Floor, Los Angeles, California 90012; Telephone: (213) 977-6083. Plan check services are available at the Construction Services Center, at 201 North Figueroa Street, 3rd Floor, Los Angeles, CA. 90012. Start at Building and Safety Department Counter and staff will refer visitors to the Planning Dept. as appropriate. Additional information is available from the City Planning Department, Community Planning Bureau, 200 N. Spring, 6th Floor, Los Angeles, California 90012; Telephone: Eastside (213) 978-1183, Metro/Central (213) 978-1179, South LA (213) 978-1168, West/Coastal (213-978-1177 and Valley 6262 Van Nuys Blvd., Van Nuys, CA 91401, (818) 374-5050.

Scenic Highways Plan, 1979.

See also A.1. AESTHETICS.

Line of Sight/View Analysis

Potential view obstruction may be determined through the following analysis:

After the scenic features or view opportunities have been identified, identify the locations (view points) from which these scenic features are visible. Graphics should be prepared that clearly convey the view line (line-of-sight from the view point to the scenic view - either to a focal point or several representative lines-of-sight along a panoramic view), as shown in Exhibits A.2-1 and A.2-2.

Next, for each view line, a view section (cross-section) may also be prepared. View sections, (see Exhibit A.2-3), depict locations and elevations of the view point, view resources and project elements. These sections should identify the extent to which the view is clear or obstructed by existing and proposed structures.

Where a view line is obstructed by a proposed structure or vertical element, prepare a field of view graphic, as shown in Exhibit A.2-4, to portray the extent of the obstruction. The field of view graphic should show where the view is interrupted, and allow for the measurement of potential obstruction by project elements, through representation of the intersection of view lines and proposed structures. This methodology may be adapted to different circumstances, including where the scenic view is either panoramic or a focal point and where the view location is either a single point or a segment.

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Sample of Policies in the Scenic Highway Plan

- Policies. Scenic resources, including natural and man-made features, should be identified, preserved, and enhanced.
- Scenic Highway Selection Criteria. Scenic highways should include either a public right-ofway (ROW) which traverses an undeveloped area of scenic quality or which traverses an urban area which contains cultural, historical, or aesthetic values.
- Corridor Development Criteria. Grading should be minimized. Landscaping should be utilized to preserve and enhance the natural setting. Existing vegetation and views should be preserved.
- Programs. Corridor plans shall be developed for each scenic highway. Federal and State funds should be sought for acquisition, access, development, preservation and enhancement of scenic corridors. Scenic corridor projects should be included in the Capital Improvement Program (CIP). Property and scenic easements should be acquired.
- Policies. Corridor Plans for each scenic highway should include development controls for landscaping, contour grading, screening, hiking, biking and equestrian trails, view protection, provisions for scenic turnouts, vista points, rest stops, and other complementary facilities.
- Corridor Development Criteria. Development should be controlled adjacent to scenic highways and land adjacent to the ROW required to insure perpetuation of the corridor's scenic qualities. The scenic highway should be developed with construction materials compatible Existing vegetation and views should be preserved. identification and informational signs should be permitted. Building height, setbacks, spacing, location and design should be regulated. In urban scenic corridors, screening/buffering, sign control, street lighting, landscaping, mini-parks, green median strips, street furniture, walkway design, murals, and fountains should be utilized.

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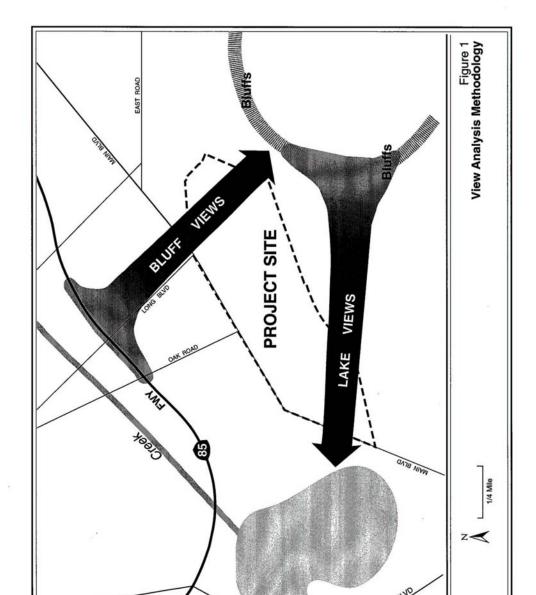


Exhibit A.2-1 VIEW ANALYSIS METHODOLOGY

Exhibit A.2-2 VIEW LINES

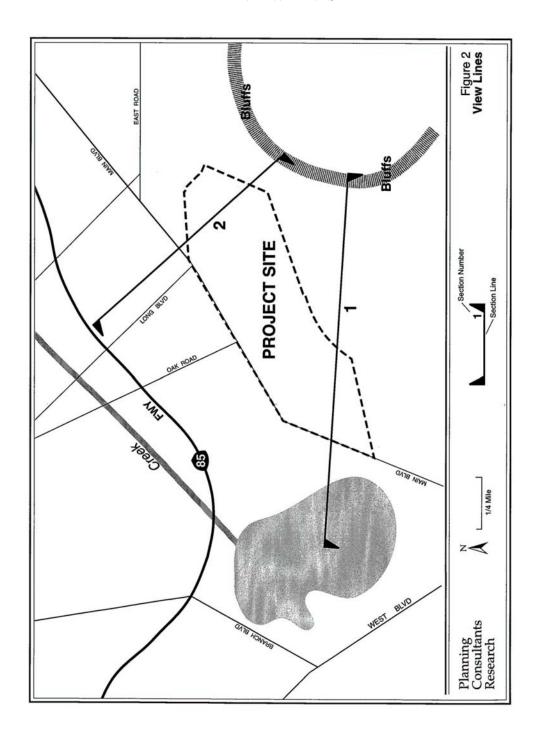


Exhibit A.2-3 VIEW SECTIONS

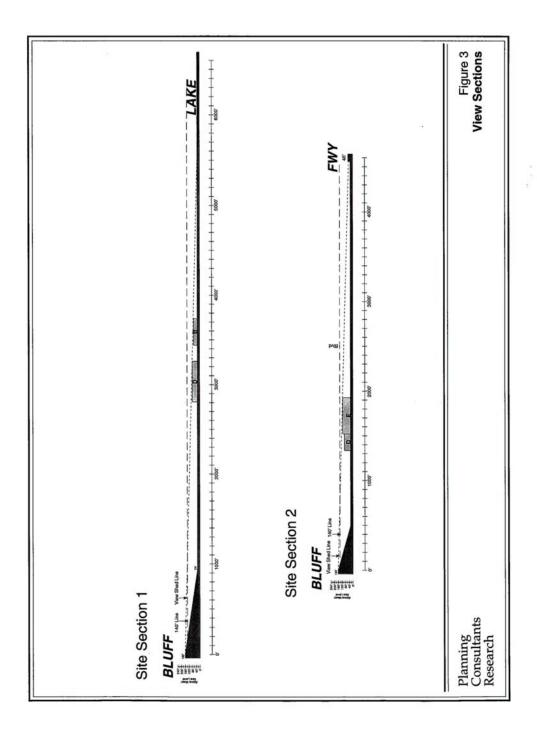
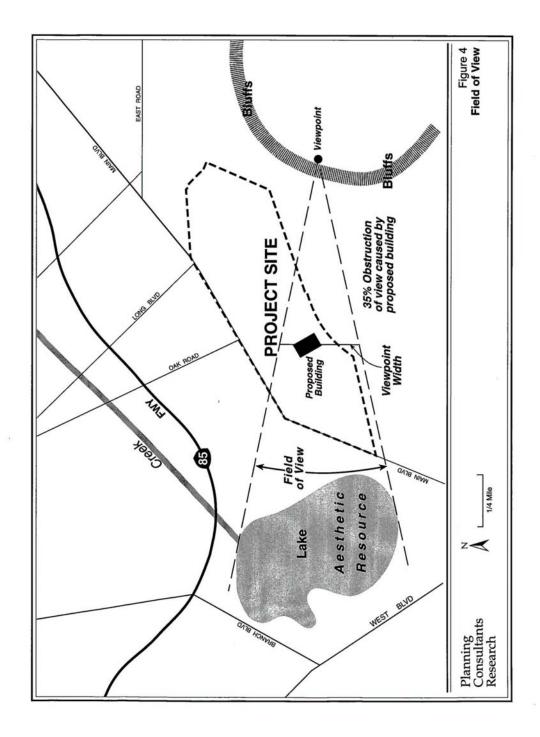


Exhibit A.2-4 FIELD OF VIEW



A.3. SHADING

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

I.c): Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

B. Introduction

Shading refers to the effect of shadows cast upon adjacent areas by proposed structures. Consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadow effects are dependent upon several factors, including the local topography, the height and bulk of the project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. 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.

Shading of existing sensitive uses can occur with the development of new structures located to the south of these uses. The relative effects of shading from structures are site-specific.

C. Screening Criteria

• Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast¹?

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Depending upon the position of the sun relative to the earth's rotation, shadows cast by a structure are projected east or west of true north according to the time of day and the season. For an explanation of the variation in shadow bearings specific to the latitude of Los Angeles, see Project Impacts.

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Shading from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site and surrounding area. Locate shadow-sensitive uses in the area, including, but not limited to residential, commercial, institutional or other land use types where sunlight is important to function, physical comfort, or commerce. First, calculate the distance and direction between the project and each shadow-sensitive use and determine whether the project would include light-blocking structures in excess of 60 feet in height or the equivalent. For example, structures or structural elements in excess of 30 feet in height, and located at an elevation 30 feet higher than surrounding land uses, would be equivalent to a structure in excess of 60 feet at the same elevation as the surrounding land uses. Next, determine whether shade-sensitive uses exist to the north, northeast, or northwest within a distance of three times the height of the proposed structure(s). For example, identify shade-sensitive uses located within 270 feet and north of a proposed 90-foot tall structure. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include a description of shade-sensitive uses in the surrounding area located to the north of the project site. Identify the distance from the project to each use and describe any elevation differences between the sensitive use(s) and the project site.

Facilities and operations that are sensitive to the effects of shading generally include, but are not limited to, routinely useable outdoor spaces associated with residential, recreational or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors.

Project Impacts

Review the project description and identify any proposed light-blocking structures or structural elements that would exceed 60 feet in height relative to nearby shade-sensitive uses. Determine the number of hours shadow-sensitive uses would be shaded by project-related structures

As appropriate, diagram the footprint of the proposed structure(s) and nearby shade sensitive uses. Calculate and diagram the length of shadows that would be cast by proposed buildings during extreme conditions, as represented by the Winter Solstice (December 22) and Summer Solstice (June 21). The Spring and Fall Equinox represent intermediate conditions.

Exhibit A.3-1 identifies shadow length values and shadow bearings in the Los Angeles area for the solstices and equinox for morning, noon, and afternoon hours. The shadow length multiplier values represent the length of a shadow proportional to the height of a given building, at specific times of day. Hence, a building of 100 feet in height would cast a shadow 303 feet long at 9:00 a.m. during the Winter Solstice.

Exhibit A.3-2 provides morning and afternoon maximum shadow lengths generated for given structure heights during the Winter Solstice. Exhibit A.3-3 provides the same information calculated for the Summer Solstice. Use these tables, together with the shadow bearings provided in Exhibit A.3-1, to determine shadow patterns from the proposed project.

Exhibit A.3-4 shows how to plot shadows generated by individual buildings for a specific season and time of day. For buildings located on topography elevated above surrounding

shadow-sensitive uses, the differences in ground elevation between the building and a shadowsensitive use is added to the shadow length to account for the elevation difference.

Based on the shadow patterns, determine the number of hours a project structure would shade an adjacent sensitive use. For programs or long range projects where specific structure design (i.e., building footprints and/or dimensions) have not been determined, use the maximum development envelope (i.e., maximum heights, minimum setbacks, and maximum lot coverage permitted according to the zoning) and determine shadow patterns as described above.

<u>Cumulative Impacts</u>

Review the list of related projects and identify those, which would affect the same shadowsensitive uses as the proposed project. Calculate the project shadows of the related projects and determine the combined effect of these shadows, along with those of the proposed project, using the methodology described above.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Limit the width/size of structural elements above 60 feet in height; and
- Move proposed structures further from shadow-sensitive uses.

3. DATA, RESOURCES, AND REFERENCES

City of Los Angeles specific plans, particularly West Los Angeles and Warner Center. Available from the City Planning Department's Central Maps and Publications Office at 200 N. Spring Street, 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255 or http://www.lacity.org/PLN/.

Exhibit A.3-1 SHADOW LENGTH MULTIPLIERS AND BEARINGS FOR 34° LATITUDE - LOS ANGELES

Time	Shadow Length Multiplier ^a	Shadow Bearing ^{b,c}	
Winter Solstice (December 22)			
9 a.m.	3.03	45/West	
NOON	1.60	0/North	
3 p.m.	3.03	45/East	
Spring/Fall Equinox (March 22/September 22)			
8 a.m.	2.18	73/West	
NOON	0.72	0/North	
4 p.m.	2.18	73/East	
Summer Solstice (June 22)			
9 a.m.	2.18	85/West	
1 p.m. (solar noon)	0.16	0/North	
5 p.m.	2.18	85/East	

Shadow length is identified per unit of height; the height of the structure is multiplied by the shadow length multiplier. Therefore, a 100-foot building would cast a shadow 303 feet long during the Winter Solstice at 9 a.m. (e.g., 100 x 3.03).

Source: Planning Consultants Research, 1995.

Shadow bearing is identified in degrees from north. 45/West means 45 degrees west of north; 73/East means 73 degrees east of north, etc.

Shadow sensitive uses located greater than 45° west or east of due north would not be affected by winter shadows, regardless of the distance between the proposed building and the shadow-sensitive use. Similarly, shadow sensitive uses located greater than 85° west or east of due north would not be affected by summer shadows.

Exhibit A.3-2 MAXIMUM SHADOW LENGTH GENERATED FOR GIVEN SOURCE HEIGHTS DURING WINTER SOLSTICE

Source Height (in feet) ^a	Maximum Shadow Length (in feet) ^b	Source Height (in feet) ^a	Maximum Shadow Length (in feet) ^b
60	182	310	939
70	212	320	970
80	242	330	1,000
90	273	340	1,030
100	300	350	1,061
110	333	360	1,091
120	364	370	1,121
130	394	380	1,151
140	424	390	1,182
150	455	400	1,212
160	485	410	1,242
170	515	420	1,273
180	545	430	1,303
190	576	440	1,333
200	606	450	1,364
210	636	460	1,394
220	667	470	1,424
230	697	480	1,454
240	727	490	1,485
250	758	500	1,515

Height increments could include either of the following: (1) the height of a proposed building; or (2) in cases of varying topography, the height of a proposed building together with the differential in finished ground elevations between the proposed building and an adjacent shadow-sensitive use.

Source: Planning Consultants Research, 1995.

b Shadow length at 9:00 a.m. or 3:00 p.m. during the Winter Solstice.

Exhibit A.3-3 MAXIMUM SHADOW LENGTH GENERATED FOR GIVEN SOURCE HEIGHTS DURING SUMMER SOLSTICE

Source Height (in feet) ^a	Maximum Shadow Length (in feet) ^b	Source Height (in feet) ^a	Maximum Shadow Length (in feet) ^b
60	80	310	412
70	93	320	426
80	106	330	439
90	120	340	452
100	133	350	466
110	146	360	479
120	160	370	492
130	173	380	505
140	186	390	519
150	200	400	532
160	213	410	545
170	226	420	559
180	239	430	572
190	253	440	585
200	266	450	599
210	279	460	612
220	293	470	625
230	306	480	638
240	319	490	652
250	333	500	665

^a Height increments could include either of the following: (1) the height of a proposed building; or (2) in cases of varying topography, the height of a proposed building together with the differential in finished ground elevations between the proposed building and an adjacent shadow-sensitive use.

Source: Planning Consultants Research, 1995.

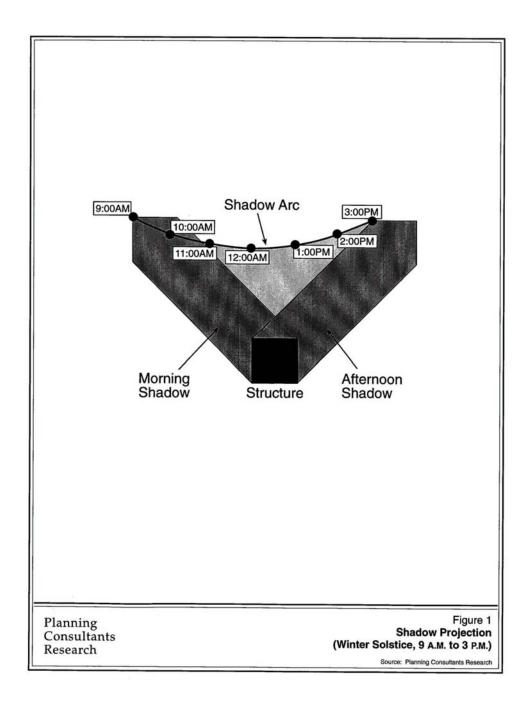
b Shadow length at 9:00 a.m. or 5:00 p.m. during the Summer Solstice (June 22).

Exhibit A.3-4 SHADOW PLOTTING METHODOLOGY

To plot potential shadows, use the following steps:

- Draw the building footprint. Measure the shadow lengths for the structure along the shadow bearings identified for the Winter Solstice in Exhibit A.3-1. Project the shadows the distance indicated in Exhibit A.3-2, from each corner of the structure. Connect the end points of the shadows cast, at the times of day for which shadow projections were made, by drawing an arc which incorporates the end points of the morning, noon and afternoon shadows, as projected from a single corner of the structure (see Exhibit A.3-5). This represents the coverage of the shadow cast by the structure throughout the day.
- Undertake the above on a separate footprint for each season identified in Exhibit A.3-1.
- At 9:00 a.m. on the Winter Solstice, shadows project at 45° west of true north. As time approaches noon, shadows both move closer to true north (at a rate of 15° per hour) and also shorten in length. After the noon hour, shadows begin to move east and elongate until 3:00 p.m., at which time they project at 45° east of true north. Summer shadows move, shorten and then lengthen in the same way throughout the day, except that they project further southward (i.e., 85° from true north during the Summer Solstice and progressing at a rate of 21.25° per hour) and reach maximum lengths shorter than those of winter shadows.
- Subdivide the shadow into equal sections which represent where the end point of the shadow will be located during each hour of the day (i.e., six equal sections to represent the six hours between 9:00 a.m. and 3:00 p.m. during the winter and eight equal sections to represent the eight hours between 9:00 a.m. and 5:00 p.m. during the summer).
- Place the sun shadow layout generated above onto a base map, which shows adjacent lot lines and the approximate location of shadow-sensitive uses (see Exhibit A.3-6).
- Determine the length of time during the day that a land use receives a shadow cast by the structure. The shadow projected by a structure, moves at a constant rate from west to east, corresponding to the movement of the sun throughout the day, and thus allowing a general determination of shadow movement, onto and away from a shade-sensitive use.

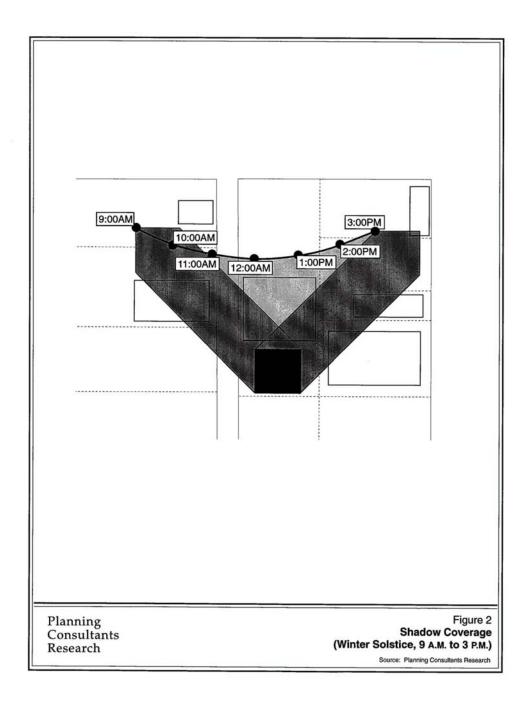
Exhibit A.3-5
Shadow Projection



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Exhibit A.3-6 Shadow Coverage



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A.4. NIGHTTIME ILLUMINATION

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

This section involves the extent to which a proposed project's artificial lighting affects the visual environment. Nighttime illumination of varying intensities is characteristic of most urban and suburban land uses including those in the City of Los Angeles. Artificial lighting has become more widely utilized in recent years to address security concerns and aesthetics.

New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. The City regulates a number of light sources (see Exhibit A.4-1).

C Screening Criteria

- Would the proposed project introduce light likely to increase ambient nighttime illumination levels beyond the property line of the project site?
- Does the project include lighting that would routinely spillover onto a light-sensitive land use?

A "yes" response to both of the preceding questions indicates further study in an expanded

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The effect of artificial lighting on biological resources is addressed in C. BIOLOGICAL RESOURCES.

Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Nighttime Illumination, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to either of the preceding questions indicates that there would be no significant Nighttime Illumination impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project for the types of lighting included. Review surrounding land use information to determine the location of light-sensitive land uses. Lightsensitive land uses may include, but are not limited to, residences, including board and care facilities; commercial or institutional uses that require minimal nighttime illumination for proper function, physical comfort, or commerce; and natural areas. Determine the potential for routine spillover of light or an increase in ambient light levels by considering the project's proximity to light-sensitive uses, the intensity of project light sources, and the existing ambient light environment.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and effect adjacent lightsensitive areas

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Description of existing ambient light conditions on-site and in the surrounding vicinity, including background lighting conditions, and existing light spill-over from the project site; and

Identification and description of the light-sensitive land uses in the area.

Project Impacts

Using the information from the Evaluation of Screening Criteria and Environmental Setting, determine the change in illumination resulting from project light sources. proposed light sources, including a locational graphic, as appropriate. Note whether existing light sources on site will remain or be removed. Assess the extent to which project lighting (including illuminated signage) would spill off the project site onto adjacent light-sensitive areas, considering the direction in which the light would be focused, whether shielding techniques would be used, and the extent to which project lighting would illuminate such sensitive land uses.

For projects involving a change in policies or long-range programs where proposed land uses are known, but specific structure designs (i.e., building or use footprints) have not been determined, identify general locations where high-intensity lighting or signage would likely occur, and evaluate the potential impacts on light-sensitive uses.

Cumulative Impacts

Review the list of related projects and identify any projects that may cause routine spill-over of light onto the same light-sensitive land uses as the project. Evaluate the impact from these projects, combined with the impact of the proposed project, using the methodology described above.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting;
- Prohibit or limit signs with flashing, mechanical, strobe, or blinking lights; moving parts; or lighted monument signs;
- Provide structural and/or vegetative screening from sensitive uses;

- Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses; and
- Restrict the operation of outdoor lighting for recreational activities to the hours of 7:00 a.m. to 10:00 p.m.

DATA, RESOURCES, AND REFERENCES

Los Angeles Municipal Code (LAMC), available from the City Clerk or http://lacity.org/lacity102.htm.

Illumination Engineering Society of North America. American National Standard Practice for Roadway Lighting.

Illumination Engineering Society of North America. Lighting Handbook, Reference and Application.

Exhibit A.4-1 SELECTED CITY MUNICIPAL CODE LIGHTING REGULATIONS

Chapter 1, Article 2, Sec. 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

Chapter 1, Article 2, Sec. 12.12.1 A 3(b). All signs permitted in the "P" Zone may be illuminated, but shall comply with the requirements set forth in Section 62.200 of this Code, and shall not contain any flashing, moving or animated parts or features.

Chapter 1, Article 2, Sec. 12.12.1.5 A 2(a). Parking buildings in the "PB" Zone shall be constructed with a continuous, enclosing wall at least three and one-half feet in height at each floor level. Said wall need not be solid but shall be constructed of materials so as to block light emitted from the building.

Chapter 1, Article 2, Sec. 12.14 A (6g). Lights used to illuminate service stations shall be arranged so as to reflect the light away from the adjacent premises in an "A" or "R" Zone, and the light standard for such lights shall not exceed 20 feet in height.

Chapter 1, Article 2, Sec. 12.22 A 23(b)(1). Mini-Shopping Centers shall have low-level security type lighting. All exterior lighting shall be directed onto the mini-shopping center site, and all flood lighting shall be designed to eliminate glare to adjoining properties.

Chapter 1, Article 2, Sec. 12.50 E. No illuminated or flashing signs shall be installed or maintained within an Airport Hazard Area which would either make it difficult for flyers to distinguish between said lights and aeronautical lights, or which would result in glare in the eyes of flyers.

Chapter 1, Article 7, Sec. 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

Division 62, Sec. 91.6205 M. No sign shall be illuminated in such a manner as to 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.

Chapter 9, Article 3, Section 93.0117. No exterior light source may cause more than two footcandles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors: elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

Note: A project may be subject to additional requirements of a specific plan, if it is located within a specific plan area.

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B. AIR QUALITY

City of Los Angeles L.A. CEQA Thresholds Guide

B. AIR QUALITY

INTRODUCTION

This section addresses the air quality impacts of projects. Air quality impacts may occur during the construction or operation phase of a project, and may come from stationary, mobile, or area sources. The topic of air quality has been divided into the following sections:

- Construction emissions
- Operational emissions
- Toxic air contaminants

The California Health and Safety Code (HSC) defines air pollution as any discharge, release, or other propagation into the atmosphere, and includes, but is not limited to, smoke, charred paper, dust, soot, grime, carbon, fumes, gases, odors, particulate matter, acids, or any combination thereof. Sources of air pollution can be classified as either stationary sources (e.g., industrial processes, generators), mobile sources (e.g., automobiles, trucks), or area sources (e.g., residential water heaters).

As described below, the South Coast Air Quality Management District (SCAQMD) is the main regulatory authority in the region (the South Coast Air Basin (Basin), which includes the City of Los Angeles) with regard to air quality issues. In April 1993, the SCAQMD adopted a CEQA Air Quality Handbook that provides guidance for the CEQA analysis of potential air quality impacts of new projects. The CEQA Air Quality Handbook addresses screening criteria for stationary and mobile source emissions; the effects of certain pollutants (e.g., toxics, carbon monoxide) on sensitive receptors; and area sources (e.g., landfills, construction sites, etc.). It also provides recommended thresholds to assist in determining the significance of potential project impacts from these sources. The SCAQMD is the responsible agency for air quality permits. Compliance with SCAQMD rules and permit conditions is a component of the region's efforts to achieve and maintain air quality standards.

The City of Los Angeles has not adopted specific Citywide significance thresholds for air quality impacts. However, because of the SCAQMD's regulatory role in the air basin, this Thresholds Guide references the screening criteria, significance thresholds and analysis methodologies in the CEQA Air Quality Handbook to assist in evaluating projects proposed within the City. Because the CEQA Air Quality Handbook may not be appropriate for every project, it is the responsibility of the lead City department to determine the appropriate standards for a particular

project.

Regulatory Framework

The Federal and California Clean Air Acts require that federal, state, and local authorities adopt air pollution reduction measures to meet health-based air quality standards (ambient air quality standards) for six specific (known as "criteria") pollutants within certain timelines. The state standards are stricter than the federal standards. The current air quality planning efforts, and the responsibilities of agencies involved in these efforts, are described below.

Federal Clean Air Act (CAA)

Title I of the CAA identifies attainment, nonattainment, and unclassifiable areas with regard to the criteria pollutants, and sets deadlines for all areas to reach attainment for the following criteria pollutants: ozone; nitrogen dioxide (NO₂); sulfur dioxide (SO₂); particulates (PM10); carbon monoxide (CO); and lead (Pb). The CAA required each state with one or more non-attainment areas to prepare a State Implementation Plan (SIP) to describe how and when each area of the state will meet attainment for all criteria pollutants. The South Coast Air Basin was identified as the only "extreme" nonattainment area for ozone and a "serious" nonattainment area for PM10 and CO. Compliance with these standards must be demonstrated in the Basin as follows: ozone by the year 2010; PM10 by the year 2006; and CO by the year 2000.

Title II of the CAA contains a number of provisions with regard to mobile sources, including requirements for reformulated gasoline, new tailpipe emission standards for cars and trucks, nitrogen oxides (NOx) standards for heavy-duty vehicles, and a program for cleaner fleet vehicles. Identification and regulation of hazardous air pollutants are addressed in Title III. Under Title V, conditions for operating permits are specified. In 1997, EPA promulgated new ambient air quality standards for fine particulates (PM2.5) and ozone. The implementation guidelines, including deadlines, are under development.

California Clean Air Act (CCAA)

The CCAA designates air basins as either in attainment or nonattainment for each state air quality standard. The South Coast Air Basin is designated as a "severe" nonattainment area for ozone, CO, NO₂, and PM10. The CCAA set specific targets for achieving clean air, including an annual five-percent reduction in pollutants (averaged every five consecutive three-year periods) until attainment is reached. It also incorporates the permit programs of the CAA, including New Source Review (NSR) of stationary sources, and requires a mandatory vehicle inspection program for vehicles registered in nonattinment areas (smog check).

Air Quality Management Plan (AQMP)

The 2003 AQMP describes a comprehensive air pollution control program focused on attaining the state and federal ambient air quality standards and planning requirements in the Basin and those portions of the Southeast Desert Air Basin that are under the SCAQMD's jurisdiction, (the Antelope and Cochella Valleys). It calls for the implementation of all-feasible control measures, and the advancement and use of technologies for which breakthroughs are on the horizon. The AQMP is updated every 3 years. Revisions to the Plan are considered amendments to the SIP.

Regional Comprehensive Plan and Guide (RCP&G)

The RCP&G, developed by the Southern California Association of Governments (SCAG), was adopted in May 1995. It provides a framework for regional goals, and assists local jurisdictions in meeting state and federal requirements and devising appropriate land use strategies. The components of the RCP&G, which include air quality, transportation and land use, among others, each contain goals and strategies for identifying and reducing cumulative impacts from new projects and plans, as required by CEQA and other state and federal regulations.

Framework and Air Quality Elements

The City approved a comprehensive update to the long-term growth strategy in its General Plan. The Framework Element sets policy direction for the City's 35 Community Plan areas, in which detailed land use plans are described, and 12 citywide Elements (e.g., Transportation and Housing). The Framework Element supports land use and transportation policies and patterns that will assist the region in meeting air quality goals, for example, by encouraging the location of residential and commercial uses near transit centers and continuing the City's "centers" development concept.

The Air Quality Element was adopted in November 1992. The objectives are to aid the region in attaining state and federal air quality standards, while continuing to allow economic growth and improvement in the quality of life for City residents. This Element also discusses how the City plans to implement local programs contained in the SCAQMD's AQMP.

Los Angeles County Congestion Management Program

The Congestion Management Program (CMP) for Los Angeles County was developed to meet the requirements of Section 65089 of the California Government Code and addresses regional congestion by linking transportation, land use, and air quality decisions. The goals of the CMP

include the following:

- To link land use, transportation, and air quality decisions;
- To develop a partnership among transportation decision-makers on devising appropriate transportation solutions that include all modes of travel; and
- To propose transportation projects that are eligible for state gas tax funds.

Responsibilities of Regulatory Agencies

Environmental Protection Agency (EPA)

The EPA administers the CAA and other air quality legislation. As a regulatory agency, EPA's principal functions include the following: (1) setting federal ambient air quality standards; (2) preparing guidance for and approval of SIPs to meet or maintain these ambient air quality standards; (3) establishing national emission limits for major sources of air pollution; (4) inspecting and monitoring emission sources; (5) enforcing federal air quality laws and promulgating new regulations; and, (6) providing financial and technical support for air quality research and development programs.

California Air Resources Board (CARB)

The CARB is the state agency responsible for the coordination and administration of both state and federal air pollution control programs in California. The CARB prepares and submits a SIP to EPA, undertakes research, sets state ambient air quality standards, provides technical assistance to local air districts, compiles emission inventories, develops suggested control measures, establishes emission standards for motor vehicles, and provides oversight of air district control programs.

SCAQMD

SCAQMD shares responsibility with the CARB for ensuring that all state and federal ambient air quality standards are achieved and maintained throughout the Basin. Local air districts, including the SCAQMD, are responsible for the preparation of AQMPs, inspection of stationary sources, monitoring of ambient air quality, and planning activities such as modeling and maintenance of the emission inventory. State law assigns to local air districts the primary responsibility for the control of air pollution from stationary sources, while reserving an oversight role for the CARB. Local air districts are also responsible for developing mobile source strategies necessary to achieve the ambient air quality standards, while CARB regulates tailpipe emissions

from mobile sources.

SCAG

SCAG is a joint powers agency encompassing the counties of Los Angeles, Orange, Imperial, Riverside, San Bernardino, and Ventura and is the Metropolitan Planning Organization (MPO) for this region. SCAG's responsibility with respect to air quality planning is primarily in developing transportation, land use and energy conservation measures as part of the RCP&G, Regional Transportation Improvement Program (RTIP), and Regional Transportation Plan (RTP). SCAG also has statutory authority in conjunction with the SCAQMD for the implementation and monitoring of land use strategies and transportation control measures contained in the AQMP. SCAG prepares the required air quality conformity analyses for transportation plans, programs, and projects to comply with the federal Transportation Conformity Rule. As part of the CEQA process for regionally significant projects, SCAG evaluates the consistency of such projects with the goals and policies of the RCP&G.

B.1. CONSTRUCTION EMISSIONS

1. INITIAL STUDY SCREENING PROCESS

A. **Initial Study Checklist Questions**

- Would the project conflict with or obstruct implementation of the applicable air III.a) quality plan?
- III.b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- III.c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- III.d) Would the project expose sensitive receptors to substantial pollutant concentrations?

B. Introduction

Construction of new projects has the potential to create air quality impacts through earth moving operations and the use of heavy-duty equipment. Fugitive dust emissions result from land clearing, demolition, ground excavation, cut and fill operations, and equipment traffic over temporary roads at construction sites. Mobile source emissions, primarily nitrogen oxides (NOx), result from the use of construction equipment such as bulldozers, trucks, and scrapers. These emissions are most significant when using heavy-duty, diesel-fueled equipment. Mobile source emissions also result from vehicle trips by construction workers to and from the project site. 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. The assessment of construction air quality impacts considers each of these potential sources individually, as well as collectively.

As described in B. AIR QUALITY (the Introduction to the Air Quality sections), a number of plans, policies and regulations have been adopted by agencies at the local, state and federal levels to address air quality concerns. Each of these plans contains regulations, control

strategies, or policies and programs designed to reduce the air pollutant emissions of new, and in some cases existing, development projects. The primary strategy related to construction emissions implemented and enforced by the South Coast Air Quality Management District (SCAQMD) is Rule 403, Fugitive Dust. Exhibits B.1-1 and B.1-2 reproduce a list of dust control strategies allowed by Rule 403. Compliance with SCAQMD rules and permit conditions is a component of the region's efforts to achieve and maintain air quality standards.

Refer to B.2. OPERATIONAL EMISSIONS for a discussion of carbon monoxide (CO) hotspots and F.2. HUMAN HEALTH HAZARDS for removal of asbestos containing material.

C. **Screening Criteria**

Would site preparation or construction activities for the proposed project result in substantial emissions that would not be controlled on site by existing regulations?

A "yes" response to the preceding question indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR, may be required. Refer to the Significance Threshold for Construction Emissions, and review the associated Methodology to Determine Significance as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact from Construction Emissions from the proposed project.

D. Evaluation of Screening Criteria

Although the City of Los Angeles has not adopted specific guidance with regard to construction emissions, a number of sources are available to assist in this evaluation. SCAQMD's CEQA Air Quality Handbook contains a Screening Table for Construction based on construction emissions occurring over a three-month (quarterly) period (CEQA Air Quality Handbook pages 6-12). The table lists the sizes and amounts of various types of development projects and construction activities, over which a potentially significant air quality impact could occur, considering both dust generation and exhaust from construction equipment. In addition, the Environmental Protection Agency (EPA) publication, Compilation of Air Pollutant Emission Factors (AP-42), contains emission factors and methodologies for calculating emissions from off-highway mobile construction equipment and non-vehicular equipment. AP-42 also contains factors to estimate the dust generation per acre of graded land.

2. **DETERMINATION OF SIGNIFICANCE**

A. **Significance Threshold**

Although the City has not adopted a Citywide significance threshold for construction emissions, SCAQMD's CEQA Air Quality Handbook and/or EPA's AP-42 contain emission factors and assessment methodologies. It is the responsibility of the lead City department to determine the appropriate standards. This Thresholds Guide reprints guidance from the CEQA Air Quality Handbook to assist in the evaluation of project impacts, as determined appropriate by each lead City agency.

Project-related factors to be used in a case-by-case evaluation of significance include the following:

Combustion Emissions from Construction Equipment

Type, number of pieces and usage for each type of construction equipment; Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and Emission factors for each type of equipment.

Fugitive Dust

Grading, Excavation and Hauling:

Amount of soil to be disturbed on-site or moved off-site; Emission factors for disturbed soil: Duration of grading, excavation and hauling activities; Type and number of pieces of equipment to be used; and Projected haul route.

Heavy-Duty Equipment Travel on Unpaved Roads:

Length and type of road; Type, number of pieces, weight and usage of equipment; and Type of soil.

Other Mobile Source Emissions Number and average length of construction worker trips to project site, per day; and Duration of construction activities.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, provide the regulatory framework and discuss regional and local air quality, including ambient air monitoring data from the monitoring station closest to or most representative of the project site. Monitoring data may be obtained from the SCAQMD Air Quality Evaluation Staff or the CEQA Air Quality Handbook. Identify the location of sensitive receptors, such as residences, schools, childcare centers, hospitals, parks, or similar uses, in relation to the project site.

Project Impacts

Using the information described in the significance factors listed above, and guidance from the appropriate source, calculate the emissions from all construction-related activities, including equipment, earth moving, and worker travel, using the worst-case day. Identify measures that will be taken as part of the construction activity to reduce air emissions, including measures to comply with Rule 403. Determine the impact from all project-related construction emissions

Cumulative Impacts

Review the related projects list and identify those projects with construction schedules that would coincide with the schedule of the proposed project. Estimate the potential emissions from the related projects that would occur during construction of the proposed project, based on available information and using the methodology above. Determine the combined emissions for the proposed and related projects and the resulting cumulative impact.

Sample Mitigation Measures

All construction projects must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.

Potential mitigation measures beyond current requirements include the following:

Establish an on-site construction equipment staging area and construction worker parking lot, located on either paved surfaces or unpaved surfaces subjected to soil stabilization treatments, as close as possible to a public highway. Control access to public roadways by limiting curb cuts/driveways to minimize project construction impacts upon roadway traffic operations;

Properly maintain non-vehicular equipment engines to minimize the volume of exhaust emissions;

Use electricity from power poles, rather than temporary diesel or gasoline powered generators;

Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane);

Pave construction roads;

Inspect construction equipment prior to leaving the site and wash off loose dirt with wheel washers, as necessary; and

Provide ridesharing or shuttle service for construction workers.

3. DATA, RESOURCES, AND REFERENCES

Air Quality Element, 1992. Available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255.

EPA, Compilation of Air Pollutant Emission Factors, AP-42.

SCAQMD, CEQA Air Quality Handbook, 1993. AQMP and Appendices, adopted August 2003.

SCAQMD, Rules and Regulations. Volumes I, II and III. Information regarding a particular rule or regulation may be obtained by calling the SCAQMD at (909) 396-3600 or 1-(800)-CUT-SMOG.

See also B. AIR QUALITY for description of regulatory framework, including the regulations and agencies involved.

Exhibit B.1-1

REPRINT OF SCAOMD RULE 403 (Amended December 1998), PAGE 14

REASONABLY AVAILABLE CONTROL MEASURES FOR HIGH WIND CONDITIONS

FUGITIVE DUST SOURCE CATEGORY

CONTROL MEASURES

Earth-moving

- Cease all active operations, OR (1A)
- Apply water to soil not more than 15 minutes prior to moving such soil. Disturbed surface (2A)

areas

(0B) On the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days: apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; OR

- (1B) Apply chemical stabilizers prior to wind event; OR
- (2B) Apply water to all unstabilized disturbed areas 3 times per day, if there is any evidence of wind-driven fugitive dust, watering frequency is increased to a minimum of 4 times per day; OR
- (3B) Take the actions specified in Table 2, Item (3C); OR
- (4B) Utilize any combination of control actions (1B), (2B) and (3B) such that, in total, these actions apply to all disturbed surface areas.

Unpaved roads

- (1C)Apply chemical stabilizers prior to wind event; OR
- (2C)Apply water twice [once] per hour during active operation; OR
- (3C)Stop all vehicular traffic.

Open storage piles

- (1D)Apply water twice [once] per hour; OR
- Install temporary coverings. (2D)

Paved road track-out

- (1E) Cover all haul vehicles; OR
- (2E) Comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.

All Categories

Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 1 may be used.

^{*}Measures in [brackets] are reasonably control measures and only apply to sources not within the South Coast Air Basin.

Exhibit B.1-2

REPRINT OF SCAQMD RULE 403 (Amended December 1998), PAGES 15 AND 16

DUST CONTROL FOR EXEMPTION FROM PARAGRAPH (d)(4)

FUGITIVE DUST SOURCE CATEGORY

CONTROL ACTIONS

Earth-moving (except construction cutting and filling areas, and mining operations)

- Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other (1a)equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR
- For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.

Earth-moving: Construction fill areas:

Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other (1b)equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. For areas which have an optimum moisture content for compaction of less than 12 percent, as determined by ASTM Method 1557 or other equivalent method approved by the Executive Officer and the California Air Resources Board, and the U.S. EPA, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.

Earth-moving: Construction cut areas and mining operations

Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active (1c)cut or mining area unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.

Exhibit B.1-2, continued

REPRINT OF SCAOMD RULE 403 (Amended December 1998), PAGES 15 AND 16

DUST CONTROL FOR EXEMPTION FROM PARAGRAPH (d)(3)

FUGITIVE DUST SOURCE CATEGORY

CONTROL ACTIONS

Disturbed surface areas (except completed grading areas)

Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 [70] percent of the unstabilized areas.

Disturbed surface area: Completed grading areas

- (2c)Apply chemical stabilizers within five working days of grading completion; OR
- (2d)Take actions (3a) or (3c) specified for inactive disturbed surface areas

Inactive disturbed surface areas

- Apply water to at least 80 [70] percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible to watering vehicles due to excessive slope or other safety conditions; OR
 - (3b)Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR
- (3c)Establish a vegetative ground cover within 21 [30] days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR
- Utilize any combination of control actions (3a), (3b), and (3c) such that, in total, these actions apply to all inactive disturbed surface areas.

Unpaved Roads

- (4a) Water all roads used for any vehicular traffic at least once per every two hours of active operations [3 times per normal 8 hour work day]; OR
 - (4b)Water all roads used for any vehicular traffic once daily and restrict vehicle speeds to 15 miles per hour; OR

^{*}Measures in [brackets] are reasonably available control measures and only apply to sources not within the South Coast Air Basin.

Exhibit B.1-2, continued

REPRINT OF SCAQMD RULE 403 (Amended December 1998), PAGES 15 AND 16

DUST CONTROL FOR EXEMPTION FROM PARAGRAPH (d)(3)

FUGITIVE DUST SOURCE CATEGORY

CONTROL ACTIONS

Unpaved Roads (cont'd.)

Apply a chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a (4c)stabilized surface.

Open storage piles

- Apply chemical stabilizers; OR (5a)
- Apply water to at least 80 [70] percent of the surface area of all open storage piles on a daily basis when there is (5b)evidence of wind driven fugitive dust; OR
 - (5c) Install temporary coverings, OR
- (5d)Install a three-sided enclosure with walls with no more than 50 percent porosity, which extend, at a minimum, to the top of the pile.

All Categories

- (6a) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 2 may be used.
- *Measures in [brackets] are reasonably available control measures and only apply to sources not within the South Coast Air Basin.

B.2. OPERATIONAL EMISSIONS

1. INITIAL STUDY SCREENING PROCESS

Α. **Initial Study Checklist Questions**

- III.a): Would the project conflict with or obstruct implementation of the applicable air quality plans?
- III.b): Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- III.c): Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including exceeding emissions which exceed quantitative thresholds for ozone precursors)?
- III.d): Would the project expose sensitive receptors to substantial pollutant concentrations?
- III.e): Would the project create objectionable odors affecting a substantial number of people?

В. Introduction

Operational emissions are defined as those, which occur after project construction activities have been completed, and the project becomes operational. Operational emissions are produced by the occupants of a facility or development and by both mobile and stationary sources connected to the facility or development. Depending on the characteristics of the individual project, operational activities have the potential to generate emissions of criteria and/or toxic air contaminants. This section focuses on emissions of criteria pollutants by point, mobile, and area sources. Toxic air emissions, which may occur during operational activities, are discussed separately in B.3. TOXIC AIR CONTAMINANTS.

Stationary source emissions include point source emissions that have an identifiable location, such as a smokestack, as well as area source emissions, such as fumes or minor sources of exhaust, which are emitted by multiple, small sources. Stationary point sources include project equipment and processes such as power plants and refinery boilers, while area sources originate from diverse sources such as generators and residential water heaters. Certain industrial and commercial operations, such as dairies and wastewater treatment plants, may

result in odors that impact sensitive receptors in the surrounding area.

Mobile source emissions occur as a result of motor vehicle, train, ship, and airplane travel. Motor vehicle emissions result from passenger vehicles and truck travel throughout the South Coast Air Basin (Basin) and are generally analyzed on a regional basis. Projects can be either direct sources of vehicle trips, such as a bus or shipping service, or indirectly generate or attract trips from or to the project site, such as a regional shopping center or employee work site.

Motor vehicle emissions can influence local air quality through changes in carbon monoxide (CO) concentrations, which are usually highest at busy intersections, parking garages, or other focused areas of vehicle activity. Because CO dissipates quickly, and based on methodologies established by the South Coast Air Quality Management District (SCAQMD) and California Air Resources Board (CARB), changes in CO concentrations are generally analyzed only where they would be in proximity to sensitive receptors.

Regulatory Framework

As described in B. AIR QUALITY, a number of plans, policies, and regulations have been adopted by local, state and federal agencies to address air quality concerns. Each of these plans and regulations are designed to reduce criteria pollutants for which state and federal health-based standards have been set.

Emissions from new, expanded and/or relocated stationary sources are regulated extensively by the SCAQMD through Regulation XIII, New Source Review (NSR); the permitting process for specific equipment and industrial processes; and compliance with sourcespecific regulations. NSR requires that any net increase in air pollutants from new or modified sources is offset by a reduction in emissions from another source. If the potential to emit is small (less than four tons/year) for any given criteria pollutant, a facility is exempt from providing emission offsets. However, if potential annual emissions are equal to or greater than four tons of reactive organic gases (ROG), nitrogen oxides (NOx), sulfur oxides (SOx), or particulate matter (PM10), they must be offset by Emission Reduction Credits (ERCs). The rule also requires that new sources install Best Available Control Technology (BACT) as a means of limiting air emissions.

In October 1993, the SCAQMD adopted the Regional Clean Air Incentives Market (RECLAIM) program to provide certain stationary source facilities added flexibility in meeting emission reduction requirements and to lower the cost of compliance. RECLAIM facilities are those that generate four or more tons of NOx and SOx per year. Each facility is assigned an emissions cap that decreases over time, and is allowed to select appropriate and cost-effective strategies to meet the emissions cap. Facilities are allowed "RECLAIM Trading Credits"

(RTCs) to account for excess reduction of emissions, which can be traded (sold) to other facilities that are not able to reduce emissions as effectively.

Title V of the Clean Air Act Amendments (CAAA) requires certain facilities to obtain a single, facility-wide air permit, which consolidates and replaces all previously issued air permits for individual pieces of equipment. Locally, Title V is implemented through SCAQMD's Regulation XXX and is applicable to a facility if it is a Major stationary source or subject to Title IV, solid waste incineration requirements, a New Source Performance Standard (NSPS), or a National Emission Standard for Hazardous Air Pollutants (NESHAP). Major sources are facilities with actual emissions of 8 tons per year of volatile organic compounds (VOC), NOx, or any single Hazardous Air Pollutant (HAP) or with yearly emissions in excess of 80 tons of SOx, 40 tons of CO, or 56 tons of PM10.

The SCAQMD's Rule 2202, On-Road Motor Vehicle Mitigation Options (required for employers of more than 250 people), provides a menu of strategies to reduce or otherwise mitigate the mobile source emissions resulting from employee commute trips. In addition, land use strategies and improvements to public transit that result in fewer single occupant vehicle (SOV) trips are being implemented by various agencies in the region, including the City. Other mobile source emission reduction strategies, such as market incentives and intercredit trading programs, are currently under study. Tailpipe emissions are regulated by CARB.

In air quality nonattainment and maintenance areas, transportation plans, programs, and projects must contribute to reducing motor vehicle emissions and be drawn from a conforming air quality plan. Conformity is a determination made by the Metropolitan Planning Organization (MPO) and United States Department of Transportation (DOT) that the transportation plans and programs meet the "purpose" of the State Implementation Plan (SIP), namely, reducing pollutant emissions to meet the National Ambient Air Quality Standards (NAAQS). All federally assisted and regionally significant projects, including non-federally assisted projects, are subject to the federal Transportation Conformity Rule. The Southern California Association of Governments (SCAG) is the MPO for the 5-county southern California region, including Los Angeles County and its member cities.

Because the City of Los Angeles has not established or adopted Citywide screening criteria or significance thresholds for operational emissions, the *Thresholds Guide* reprints guidance from the SCAQMD's CEQA Air Quality Handbook to assist in the evaluation of project impacts. The Screening Criteria, Evaluation of Screening Criteria, Significance Threshold and Project Impact sections that appear in this document are all reprinted from, or summaries of, the guidance in the CEQA Air Quality Handbook. For further information, please refer to the CEQA Air Quality Handbook, available from the SCAQMD. It is the responsibility of the lead City department to determine the appropriate significance criteria.

C. Screening Criteria

Would the proposed project:

Result in a development and/or activity level equal to or greater than the thresholds provided in the CEQA Air Quality Handbook's Screening Table for Operation – Daily Thresholds of Potential Significance for Air Quality¹ (see Exhibit B.2-1)?

Conflict with the regional population forecast and distribution in the most recent Air Quality Management Plan (AQMP)?

Have the potential to create or be subjected to an objectionable odor or localized CO hot spot that could impact sensitive receptors?

A "yes" response to any of the preceding questions indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Operational Emissions, and review the associated Methodology to Determine Significance as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact from Operational Emissions from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, and identify all new or modified sources of stationary and mobile source emissions. Use Exhibit B.2-1 to assess the potential to exceed the daily emissions thresholds for criteria pollutants. Consider the population likely to result from project implementation and identify conflicts with the regional population forecast and distribution in the most recent AQMP. Determine the potential for objectionable odors to impact sensitive receptors. Sensitive land uses include residences, board and care facilities, schools, playgrounds, hospitals, parks, childcare centers, and outdoor athletic facilities.

Compare this information to the Screening Criteria.

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This table is based on potential mobile source emissions for specified land uses and is not intended to screen for stationary sources. Stationary sources are screened on an individual basis by SCAQMD permit staff. (J. Nadler, SCAQMD, personal communication, October 1997.)

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

A proposed project would normally have a significant impact on air quality from project operations if any of the following would occur:

Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds presented below (as reprinted from the CEQA Air Quality Handbook):

Pollutant	Significance Threshold (lbs./day)
ROG	55
NOx	55
CO	550
PM10	150
SOx	150

Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or

The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

The project creates an objectionable odor at the nearest sensitive receptor.

В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

The air quality regulatory framework;

Description of existing ambient air quality conditions as indicated by data from the SCAQMD monitoring station closest to, or most representative of, the project site;

Summary of regional climate and air quality conditions, including a wind rose (which diagrams the frequency of occurrence for each wind direction), if odors are anticipated;

Description of the project site and surrounding area, including the location of sensitive receptors; and

Summary of the existing transportation system and traffic conditions, such as traffic volumes, Level of Service (LOS), transit facilities, etc.

Project Impacts

Project-related factors to be used in evaluating significance include the following:

Type, number of pieces, and usage of equipment;

Rate, quantity, and type of fuel consumption;

Emission factors, assuming implementation of applicable rules and regulations;

Type(s) and size(s) of land uses, including location of vehicle driveways and parking facilities;

The location and usage of equipment or processes that may emit odors;

Modes of transportation, fleet mix, length, number, and type (e.g., work, non-work) of trips, main routes:

Number of employees per land use category; and

Vehicle speeds and ambient temperature.

Pollutant emission rates for known pieces of equipment or processes, as well as energy consumption, are generally available from the manufacturer or from the SCAQMD. If information regarding the number and type of equipment proposed is not available, stationary source emissions may be estimated by using other indicators, such as emission rates per square foot of development. Standardized default values are provided in the CEQA Air Quality Handbook, or consult CARB source classification codes and Environmental Protection Agency (EPA) emission factors.

There are three main methods of determining mobile source and energy consumption emissions as identified by the SCAQMD, depending on the level of detail needed. These include the use of:

Screening Tables 9-7 and 9-8 in the CEQA Air Quality Handbook;

Computer modeling, using the most recent version of Mobile Assessment for Air Quality Impacts (MAAQI); and

Methodology and emission factors in Appendix 9 of the CEQA Air Quality Handbook.

The MAAQI model, and the methodology in Appendix 9 of the CEQA Air Quality Handbook, allow estimation of emissions of criteria pollutants from vehicle trips associated with new or modified development, incorporating the most recent vehicle emission factors (EMFAC) from CARB. User-defined inputs to the models include project type, average vehicle miles traveled, year, season, trip speed, and other parameters. This information would be identified in the project traffic study. (See Appendix 9 of the CEQA Air Quality Handbook for more information.) Determine project-related mobile source emissions and compare to the daily emissions threshold reprinted from the CEQA Air Quality Handbook in the significance threshold.

Localized Mobile Sources (CO Hotspots)

Calculate future CO levels and the incremental increase in CO levels resulting from the proposed project at an intersection, driveway, parking facility, or roadway within one-quarter mile of a sensitive receptor. Assess whether there is an exceedance of the California standards.

Where more detailed or site specific analysis is desired, the CEQA Handbook recommends a dispersion model to estimate potential CO "hotspots," such as CALINE and CAL3QHC. For a detailed explanation of the CALINE4 model, refer to the California Air Resources Board publication Air Quality Technical Analysis Note (AQ-TAN): Microscale CO Procedures for California Users. Caltrans has also prepared a "CO Protocol" which is available for use within California and was developed based on information specific to California roads and driving conditions. Project-specific information from the traffic study or SCAQMD default values may be used.

Ambient CO concentrations through the year 2010 are presented in the CEQA Handbook and in the SCAQMD's Draft Technical Report V-I: Assessment of Nitrogen Dioxide and Carbon Monoxide in the South Coast Air Basin.

Based on the project's operational components, including activities and measures designed to reduce odors, determine whether the project would create an objectionable odor at the nearest sensitive receptor. Consider patterns of air flow/prevailing winds as applicable.

Using the information from the Evaluation of Screening Criteria, the project evaluation described above, and guidance from the appropriate source, calculate the emissions from operational activities, using the worst-case conditions. Identify measures that will be taken as part of the project to reduce air emissions. Determine the impact from all project sources.

Cumulative Impacts

Review the list of related projects and identify those that would have pollutant or odor emissions. Determine the potential impacts of all such projects, together with the proposed project, using the methodology above.

Sample Mitigation Measures

Potential mitigation measures include the following:

Install on-site pollution control equipment;

Modify industrial processes to reduce emissions;

Provide telecommunications centers near residential areas;

Establish shuttle service from residential areas to transit centers or commercial core areas;

Construct off-site pedestrian facility improvements, such as overpasses and wider sidewalks;

Contribute to regional transit systems (e.g., right-of-way, capital improvements, etc.);

Construct, contribute, or dedicate land for the provision of off-site bicycle trails linking the facility to designated bicycle commuting routes:

Provide video-conferencing facilities;

Implement home dispatching system where employees receive routing schedule by phone instead of driving to work;

Use low-emission fleet vehicles;

Provide on-site child care facilities;

Provide services, facilities, or incentives to reduce employee work trips. Consider ride share programs or shuttle service for employees;

Include adequate ventilation systems in parking structures to dissipate CO emissions;

Contribute to signal synchronization at congested areas;

Locate sensitive receptors away from potential "hotspots;" and

Provide barriers, such as wall or vegetative screen, between hotspots and sensitive receptors.

See L.1 INTERSECTION CAPACITY for Transportation Demand Management (TDM) measures.

See M.4 ENERGY for energy conservation mitigation measures.

3. DATA, RESOURCES, AND REFERENCES

SCAQMD, CEQA Staff (909-396-3109) and www.aqmd.gov\ceqa.

CARB. AQ-TAN. Microscale CO Procedures for California Users. June 1988.

CARB. CALINE4 - A Dispersion Model For Predicting Air Pollutant Concentrations Near Roadways. Revised June 1989. www.dot.ca.gov/hg/env/air/calinesw.htm.

California Department of Transportation (Caltrans). CO Transportation Project Protocol, 1997.

Local Government Commission (LGC), Land Use Strategies for More Livable Places, June 1992. (This publication may be obtained by writing to LGC, 909 12th Street, Suite 205, Sacramento, CA 95814.)

SCAQMD, Draft Technical Report V-I: Assessment of NO₂ and CO in the SCAB. December 1990.

See also B. AIR QUALITY and B.1. CONSTRUCTION EMISSIONS.

Urbemis 2002 (version 7.4.2) A Model that Estimates Air Pollution from a Wide Variety of Land Use Projects. www.agmd.gov/cega/urbemis.htm.

Exhibit B.2-1 REPRINT OF SCAQMD CEQA AIR QUALITY HANDBOOK, PAGES 6-10 TO 6-12 SCREENING TABLE FOR OPERATION

DAILY THRESHOLDS OF POTENTIAL SIGNIFICANCE FOR AIR QUALITY

Primary Land Use	Potentially Significant Air Quality Impact
Residential	
Single Family Housing	166 units
Apartments	261 units
Condominiums	297 units
Mobile Homes	340 units
Retirement Community	612 units
Education	
Elementary School	220,000 sq.ft.
High School	177,000 sq.ft.
Community College	150,000 sq.ft.
University ^a	813 students
Commercial	
Airport ^a	15 Daily Commercial Flights
Business Park	136,000 sq.ft.
Day Care	26,000 sq.ft.
Discount Store a	32,000 sq.ft.
Fast Food w/o Drive-Thru	3,500 sq.ft.
Fast Food with Drive-Thru	2,800 sq.ft.
Hardware Store a	28,000 sq.ft.
Hotel	213 rooms
Medical Office	61,000 sq.ft.
Motel	220 rooms
Movie Theater ^a	30,000 sq.ft.
Car Sales ^a	43,000 sq.ft.
Office (small, 10-100)	96,221 sq.ft.
Office (medium, 100-200)	139,222 sq.ft.
Office (large, 200->)	201,000 sq.ft.
Office Park	171,000 sq.ft.
Racquet Club	98,000 sq.ft.
Research Center	245,000 sq.ft.
Resort Hotel	199 rooms
Restaurant	23,000 sq.ft.
Restaurant (high-turnover) ^a	9,000 sq.ft.

Exhibit B.2-1, continued

REPRINT OF SCAQMD CEQA AIR QUALITY HANDBOOK, PAGES 6-10 TO 6-12 SCREENING TABLE FOR OPERATION

DAILY THRESHOLDS OF POTENTIAL SIGNIFICANCE FOR AIR QUALITY

Primary Land Use	Potentially Significant Air Quality	
	Impact	
Commercial (cont'd.)		
Shopping Center (small, 10-500)	22,000 sq.ft.	
Shopping Center (medium, 500-1,000)	50,000 sq.ft.	
Shopping Center (large, 1,000-1,600)	64,000 sq.ft.	
Special Activity Center ^a	87 employees	
(Stadiums and Amusement Parks)		
Supermarket	12,500 sq.ft.	
Industrial/Mining		
Light Industrial	276,000 sq.ft.	
Heavy Industrial ^a	1,284,000 sq.ft.	
Industrial Park	276,000 sq.ft.	
Aircraft Manufacturing & Repairs	b	
Bulk Terminals	b	
Cement Plant	b	
Chemical Plant	b	
Hazardous Waste Treatment & Storage	b	
Manufacturing	500,000 sq.ft.	
Mining	b	
Pulp/Paper Mills	b	
Refinery	b	
Institutional/Governmental		
Clinic ^a	94,000 sq.ft.	
Government Center ^a	83,000 sq.ft.	
Hospital ^a	176 Beds	
Library	51,000 sq.ft.	
Nursing Home	741 Beds	
U.S. Post Office	26,000 sq.ft.	
Freeway Lane Addition	All	
Designation of a New Transportation Corridor	All	
New Freeway/Highway	All	
Auxiliary Lanes	Beyond One Ramp	

Exhibit B.2-1, continued

REPRINT OF SCAOMD CEQA AIR QUALITY HANDBOOK, PAGES 6-10 TO 6-12 SCREENING TABLE FOR OPERATION

DAILY THRESHOLDS OF POTENTIAL SIGNIFICANCE FOR AIR QUALITY

Primary Land Use	Potentially Significant Air Quality Impact
Institutional/Governmental (cont'd.)	
Waterport	b
Sewage Treatment Plant	b
Rail	All
Cogeneration Project	b
Landfill	b
Incineration	Hazardous, Medical or Municipal Waste
Power Generating Facility	b
Waste-To-Energy Plant	b

Trip generation rates from the 5th Edition ITE Manual were based upon small sample sizes.

These size construction projects have the potential to exceed the daily emissions significance thresholds. Local governments should use these thresholds as screening tools when a project proponent first approaches the lead agency for a permit, to determine whether or not the proposed project will be significant. Moreover, using these thresholds, a project proponent should be advised to include feasible mitigation measures at the project design level rather than in later stages of the project.

Definitions:

"Manufacturing" means to make goods and articles by hand or machinery, often on a large scale and with division of labor.

"Industry" means any large-scale business activity or manufacturing productive enterprises collectively, especially as distinguished from agriculture.

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New facilities, expansions or other changes that could result in emissions exceeding the significance thresholds.

B.3. TOXIC AIR CONTAMINANTS

1. INITIAL STUDY SCREENING PROCESS

Α. **Initial Study Checklist Questions**

- III.a): Would the project conflict with or obstruct implementation of the applicable air quality plan?
- III.b): Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- III.d): Would the project expose sensitive receptors to substantial pollutant concentrations?

B. Introduction

The California Health and Safety Code (HSC) Section 39655 defines a toxic air contaminant as "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." Toxic air contaminants are further classified as carcinogenic or non-carcinogenic substances.

Due to the adverse potential health effects of exposure to toxic air contaminants, both the federal and state governments have established lists of pollutants, which are either regulated at the state level through AB 1807, or at the federal level through the National Emissions Standards for Hazardous Air Pollutants (NESHAPs). The state regulations governing toxic air contaminants are more stringent than federal regulations. The primary responsibility for the implementation of these regulations within the City resides with the South Coast Air Quality Management District (SCAQMD) through its permitting authority. SCAQMD Rules 1401 (New Source Review (NSR) of Carcinogenic Air Contaminants) and 212 (Standards for Approving Permits) implement HSC Section 41700 that requires efforts to be undertaken to prevent new emissions that endanger public health. The California Air Pollution Control Officers Association (CAPCOA) has set forth specific guidelines for the assessment of non-carcinogenic air contaminants from stationary point sources.

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SCAOMD Rule 1402 regulates toxic emissions from existing facilities.

SCAQMD's CEQA Air Quality Handbook (pages 3-6 to 3-7) lists the federal and state legislation that governs the regulation of toxic air contaminants. In addition to AB 1807 (Tanner Air Toxics Act), AB 2588 addresses toxic "hot spots," AB 3205 regulates toxic releases within 1,000 feet of schools, and AB 3374 involves monitoring of disposal sites.

Under Title III of the 1990 Clean Air Act Amendments (CAAA), the Environmental Protection Agency (EPA) was required to publish a list of categories of major sources of the Hazardous Air Pollutants (Toxics or HAPs) listed in Section 112 by November 1991. That list was then divided into a 10-year regulatory schedule for developing Maximum Achievable Control Technology (MACT) standards for every category or subcategory with specific accomplishments required in 2, 4, 7, and 10 year periods after enactment.

A carcinogenic air contaminant is a substance that has been shown to cause cancer in animals or humans. There is no specific concentration of carcinogenic air contaminants that can be considered completely safe. Thus, the amount of increased risk a person has of getting cancer from exposure to carcinogenic air toxics is used as an indicator of potential significant health effects.

Non-carcinogenic toxic air contaminants are defined as those which cause health effects other than cancer, such as lung, kidney, or liver diseases; respiratory or eye irritation; and nervous, reproductive or immune system disorders. By using health studies and adding safety margins, health experts have set reference exposure levels for these toxic chemicals. The risk of non-cancer health effects is described as a ratio, or hazard index. It compares an individual's highest exposure levels at a given site to the reference exposure level for that toxic.

Impacts from toxic air contaminants can occur during either the construction or operational phases of a project. During certain construction activities, potential releases of toxic air contaminants could occur during site remediation activities, or during building demolition. Toxic air contaminants may also be released during industrial or manufacturing processes, or other activities that involve the use, storage, processing, or disposal of toxic materials.

For a discussion of accidental chemical releases, please refer to F.1. RISK OF UPSET/EMERGENCY PREPAREDNESS. Exposure to asbestos is discussed in F.2. HUMAN HEALTH HAZARDS.

C. Screening Criteria

• Would the project use, store, or process carcinogenic or non-carcinogenic toxic air contaminants which could result in airborne emissions?

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A "yes" response to the preceding question indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the significance threshold for Toxic Air Contaminants, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact from Toxic Air Contaminants from the proposed project.

D. **Evaluation of Screening Criteria**

Review the proposed project and its associated components, including demolition, site preparation, construction, and operation. Determine the potential for toxic airborne emissions. Professional assistance may be required. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

Significance Threshold A.

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The regulatory framework for the toxic material(s) and process (es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include a discussion of the applicable regulatory setting and existing facilities or operations in the area, which may release toxic air

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emissions. Identify the location and type of all sensitive uses, which could be impacted by project emissions.

Project Impacts

Review the proposed project including construction and operation activities. Identify and evaluate project features or components that would reduce the risk of exposure. The CEQA Air Quality Handbook defines the following land uses as sensitive receptors: residences, schools, playgrounds, child care facilities, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, and outdoor athletic facilities. Consider the regulatory framework and determine the resulting risk of exposure. Additional information to assist with project evaluation is provided in the CEQA Air Quality Handbook.

<u>Cumulative Impacts</u>

Review the related projects and identify those that would involve the potential release of toxic air contaminants and could contribute to a concentration of toxic air contaminants. Evaluate the potential cumulative impacts as described above for Project Impacts. Information to assist with cumulative evaluation is provided in the CEQA Air Quality Handbook.

Sample Mitigation Measures

New sources of toxic air contaminants are regulated in the South Coast Air Basin (Basin) by the SCAQMD. Permit requirements generally result in emissions that are considered to be less than significant by the SCAQMD. Consult the CEQA Air Quality Handbook for additional information.

Potential mitigation measures include the following:

- Provide barriers that reduce emissions (e.g., screens, vents, closed systems);
- Use non-toxic or less toxic substances in project construction or operation; and
- Investigate opportunities and implement programs to improve efficiency and/or reduce the amount of waste emissions generated.

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3. DATA, RESOURCES, AND REFERENCES

- SCAQMD, Toxics Division. Information on health risk assessments, toxics permits and compliance may be obtained by calling the SCAQMD Toxics and Waste Management Branch at (909) 396-2388.
- CAPCOA, Air Toxics Assessment Manual, 1987 and Air Toxics "Hot Spots" Program Risk Assessment Guidelines. (updated yearly). Available by calling CAPCOA at (916) 676-4323.
- California Air Resources Board (CARB). Documents available for each AB 1807 toxic air contaminant which is identified. Contact the CARB's Public Information Office at (916) 322-2990 or call ARB Air Quality Measures Branch (916) 445-6318. California Air Toxics Program web page http://www.arb.ca.gov/toxics/toxics.htm.
- HSC Section 44300 et sec. Air Toxics "Hot Spots" Information and Assessment Act of 1987 and Section 39650 et sec. Toxic Air Contaminants (Chapter 3.5).
- SCAQMD, Procedures for Preparing Risk Assessments to Comply with Air Toxics Rules of the SCAQMD.
- Environmental Protection Agency (EPA), Guideline on Air Quality Models (revised). EPA-450/2-78-027R. Available at http://www.epa.gov/
- See also B. AIR QUALITY, B.1. CONSTRUCTION EMISSIONS, and B.2. OPERATIONAL EMISSIONS.

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C. BIOLOGICAL RESOURCES

C. BIOLOGICAL RESOURCES

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- IV.a): Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- IV.b): Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- IV.c): Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- Would the project interfere substantially with the movement of any native resident or IV.d): migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- IV.e): Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- IV.f): Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

B. Introduction

A wide variety of sensitive biological resources, including both plant and animal species, reside in or use resources within the City of Los Angeles. The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula.

Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. In contrast, the central and valley portions of the City contain fewer natural areas.

Various-sized remnants of native habitats, such as hillside and canyon areas, wetland habitats, dunes, beaches and marine habitats exist in many areas of the City. Although these areas may have been modified from their natural conditions, they are still important habitats for wildlife. Habitat values are generally highest in areas of relatively large acreage adjacent to other similar habitat systems. Some sensitive biotic resources may persist even in urbanized settings, such as oak trees, rare plants, peregrine falcons, Monarch butterflies and bats.

Federal and state agencies, including the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (DFG), maintain listings of sensitive species and habitat (i.e., federal or state listed endangered, federal or state listed threatened, Species of Special Concern, federal or state candidate species; and federally listed critical habitat).

A project may impact biological resources through the loss or destruction of individuals of a sensitive species or through degradation of sensitive habitat. Habitat degradation may occur through grading or excavation, increases in water or air pollutants, increased noise, light, or vibration, interruption of fresh or salt water supplies, reduction in food supplies or foraging areas, or interference with established wildlife movement patterns on or between habitat areas. Projects, which create long-term or episodic impacts to natural areas -- such as by generating toxic fumes or fugitive dust -- could also result in degradation or destruction of a natural habitat. New development, construction, roadways, and agricultural use all have the potential to lower or remove natural resource values of natural open space systems.

Exhibit C-1 divides the City into five geographic zones for the purpose of identifying potential sensitive biological resources. Natural open space areas within the City's 11 Planning Subregions that may contain habitat for sensitive species are shown on Exhibits C-2 through C-5. These maps are based upon interpretation of aerial photography of the City dated November 1992¹. The maps include open space areas, as well as several areas that appear to be devoted to agriculture and mineral extraction. The latter areas are mapped because they are of substantial size and presently or potentially meet habitat needs for plants and animals. Urban parks, golf courses, and small reservoirs are excluded from this mapping unless they are physically contiguous with other habitats, such as at the Sepulveda and Hansen flood control basins. A few vacant lots within the City are also indicated on these maps by virtue of their size and present or future potential to support biological

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Areas that have been developed since November 1992 may be shown as open space habitat on these maps.

resources. Additionally, Significant Ecological Areas (SEAs), established by the County of Los Angeles through its General Plan, are shown. Exhibit C-6, describes the SEAs, open space habitats, and other potential/known sensitive resources in each planning subregion.

Both federal and state legislation calls for the protection of sensitive species, and the habitat that supports them, to reduce the chance that existing and future development will seriously endanger the continued existence of native biological resources. The presence of adequate habitat, including food and water, shelter, and nesting sites, is critical to a species' long-term survival. Exhibit C-7 provides a summary of existing known sensitive biological resources and classifications within the City of Los Angeles and vicinity, along with their federal and state listed status, habitat requirements, and the biological assessment zone (from Exhibit C-1) in which the species may exist. This exhibit also provides applicable classifications from the California Native Plant Society (CNPS).

The habitat types in the remaining natural open space areas are quite diverse. Chaparral, which supports a wide variety of wildlife, is most prevalent on the north slopes and higher-elevation south slopes of the Santa Monica and Verdugo Mountains. Open-structured coastal scrub and grassland are prevalent on the lower-elevation south slopes of these ranges, and also in the Simi Hills, Santa Susana and San Gabriel Mountains. Grasslands also occur in flood control basins and near reservoirs in various parts of the City. Along the coast, sandy beaches, rocky cliffs, headlands and promontories support marine invertebrates, fishes, mammals, birds and plants. In addition, coastal habitats, including the dunes, marshes and bluffs, support a number of unique, threatened and endangered plants and animals.

For the purposes of the *Thresholds Guide*, a sensitive biological resource is defined as follows:

- A plant or animal that is currently listed by a state or federal agency(ies) as endangered, threatened, rare, protected, sensitive or a Species of Special Concern or federally listed critical habitat;
- A plant or animal that is currently listed by a state or federal agency(ies) as a candidate species or proposed for state or federal listing; or
- A locally designated or recognized species or habitat.

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C. Screening Criteria

For projects proposed on sites within the City of Los Angeles that are located in Area 5 of Exhibit C-1, or **in the unshaded portions** of Exhibits C-2 through C-5:

- Do known individuals or populations of a sensitive species use or inhabit the site during one or more seasons of the year, according to readily available published accounts, the project proponent and/or property owner?
- Is the project site immediately adjacent to undeveloped natural open space containing native vegetation (such as the shaded areas on Exhibits C-2 through C-5) or does the site appear to serve as a buffer between existing development and more natural habitat areas? Could it be part of a movement corridor or habitat linkage system?
- Is a natural water source, such as a lake, river, vernal pool, ephemeral stream, marsh or the ocean present on or adjacent to the site?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Biological Resources and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Biological Resources from the proposed project.

For projects proposed on sites within the City of Los Angeles that are located within a shaded **open space area** as identified on Exhibits C-2 through C-5:

- Do known individuals or populations of a sensitive species use or inhabit the site during one or more seasons of the year, according to readily available published accounts, the project proponent and/or property owner?
- Does the project site contain natural open space and/or known native vegetation?
- Does the site serve as a buffer between existing development and more natural habitat areas?
- Does the site serve as a known wildlife movement corridor between habitat areas?

- Is a natural water source, such as a lake, river, vernal pool, ephemeral stream, marsh or the ocean present on, or immediately adjacent to, the project site?
- Is the project site relatively undisturbed or undeveloped, that is, free of structures, agricultural fields, pavement, etc.? Is it free of regular maintenance activities such as disking or clearing, maintenance and repair of linear utilities, maintenance or repair of roads, or maintenance and repair of municipal reservoirs and associated infrastructure?²

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Biological Resources and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to each of the previous questions indicates that there would normally be no significant impact on Biological Resources from the proposed project.

D. Evaluation of Screening Criteria

Locate the proposed project site on the appropriate map presented in Exhibits C-1 through C-5. Determine the existing conditions on the project site and surrounding area, including whether existing vegetation is native, urbanized, or ruderal (i.e, weedy or introduced plants where native vegetation has been disturbed).

If the site is located in an unshaded portion of Exhibits C-2 through C-5, review the first set of screening questions. Look for evidence that a sensitive species outside of the normal range, or an urban migratory species, uses or inhabits the site during one or more seasons. Look for unmanaged vegetation, cave-like areas, evidence of nesting, hunting, tracks or droppings, and review readily available published accounts of such sightings. Also, confer with the property owner and project proponent. Check for natural sources of water on or adjacent to the site as well as proximity of the site to areas of undeveloped open space to determine whether the site could serve as a buffer or wildlife movement corridor.

If the site is located within a shaded portion of Exhibits C-2 through C-5, review the second set of questions. Review Exhibits C-1 and C-7 to assist in identifying which species may potentially be located on the project site. If the project site has been developed or substantially disturbed since these maps were prepared in November 1992, use the questions for sites within the unshaded

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Natural surface disturbances, such as fire or flood, are not considered to be resource-degrading.

portions of the maps. The federal and state species lists change periodically; always compare with the most recent edition.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species;
- The alteration of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

B. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

A physical description of the project site, including acreage, topography, presence of sensitive features (e.g., wetlands, flowing, standing or ephemeral water sources, rock outcroppings, caves, etc.), major habitats and vegetation communities present, potential presence of wildlife populations, sensitive resources, migration corridors, and relationship to the surrounding land;

- In marine environments, describe the presence or absence of tidal wetlands, the bottom topography and depth, access to open ocean systems, information on existing biota, and the existence of movement or migration corridors of marine mammals; and
- A statement of the potential for existing sensitive resources, based upon review of Exhibit C-7, and other biological reference documents, including the California Natural Diversity Database (CNDDB), federal and state agency lists, regulatory statutes, and applicable City documents.
- A review of local, state, and federal regulations that apply to the project site.

Prepare or reference baseline assessments of potential occurrence of sensitive resources (from literature and existing resource data bases) and conduct a field reconnaissance survey, as needed. Surveys should be performed during appropriate seasons, and should include all significant biotic elements, including corridor and habitat linkages, with an assessment of the nature of their occurrence (e.g., resident, transient, migratory, etc.). Species inventories should include organisms observed during surveys, along with those reasonably expected to occur over time, with a listing of sensitive biological elements and their agency status. See Exhibit C-7 for a list of sensitive resources potentially present within the City, and Exhibits C-1 through C-5 for habitat maps for various areas of the City.

Project Impacts

Prepare a biological assessment of the site, based on the known and potential biological resources on and adjacent to the site. Determine the actual presence or absence within project boundaries or on adjacent lands of sensitive plants, animals or habitats listed as "potentially present" in resource databases. Also, note the quality of existing vegetation.

Review the project description, including site preparation, construction and operational plans, to identify which biological resources could be lost or degraded by project implementation, if any, including habitats, shelter, movement corridors, foraging grounds, and nesting areas. Professional assistance may be required. Compare the results to the Significance Threshold. Incremental loss of areas used seasonally may be significant depending upon the value of the habitat that remains.

Cumulative Impacts

Review the list of related projects and identify those that, in combination with the proposed project, could impact sensitive biological resources. Consider especially impacts to the same species, habitat, or open space area as those affected by the proposed project. Include site preparation and construction activities as well as operational activities. Note whether the projects could combine to obstruct wildlife movement corridors, contribute to habitat fragmentation, or affect sensitive plants or animals. Assess the incremental losses to habitat, foraging areas, wintering grounds, nesting sites, etc., and any potential takings of sensitive species.

Also, evaluate the impact of cumulative project operational activities on sensitive species and habitats. Consider effects such as increased traffic, noise, fumes, general human activity, ambient lighting, fencing, fugitive dust pollution, infiltration of herbicides or industrial waste chemicals, and harassment of wildlife by domestic pets.

Sample Mitigation Measures

Specific project mitigation measures should be based on recommendations in the biological assessment and involve consultation with appropriate resource protection agencies. Potential mitigation measures include the following:

- Revise project construction plans to avoid grading or excavation during sensitive seasons (e.g., rain, nesting, etc.);
- Design the project such that the most biologically-sensitive portions of the site are preserved for natural habitat;
- Block human and domestic animal access to sensitive habitats adjacent to the project site:
- Provide for revegetation/restoration after project construction; and
- Mitigation banking: Compensate (to the satisfaction of resource agencies) for the loss of habitat values in one area by purchasing or deed-restricting similar or better habitat systems on other sites. These areas would be high value ecosystems, preferably containing viable populations of sensitive resources.

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3. DATA, RESOURCES, AND REFERENCES

Los Angeles County Department of Regional Planning; Telephone: (213) 974-6411. SEA information. http://planning.co.la.ca.us.

Exhibit C-8 contains general references regarding biological resources in the Los Angeles area.

USFWS, Ecological Services, Carlsbad Field Office, 6010 Hidden Valley Road, Carlsbad, California, 92009; Telephone: (760) 431-9440. The USFWS can provide information regarding the Endangered Species Act, federally listed species, and federal wildlife resources and their protection.

Selected Legislation

Fed<u>eral</u>

Endangered Species Act of 1973, PL 93-205 (16 U.S.C. 1531)

Purpose is to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth.

State

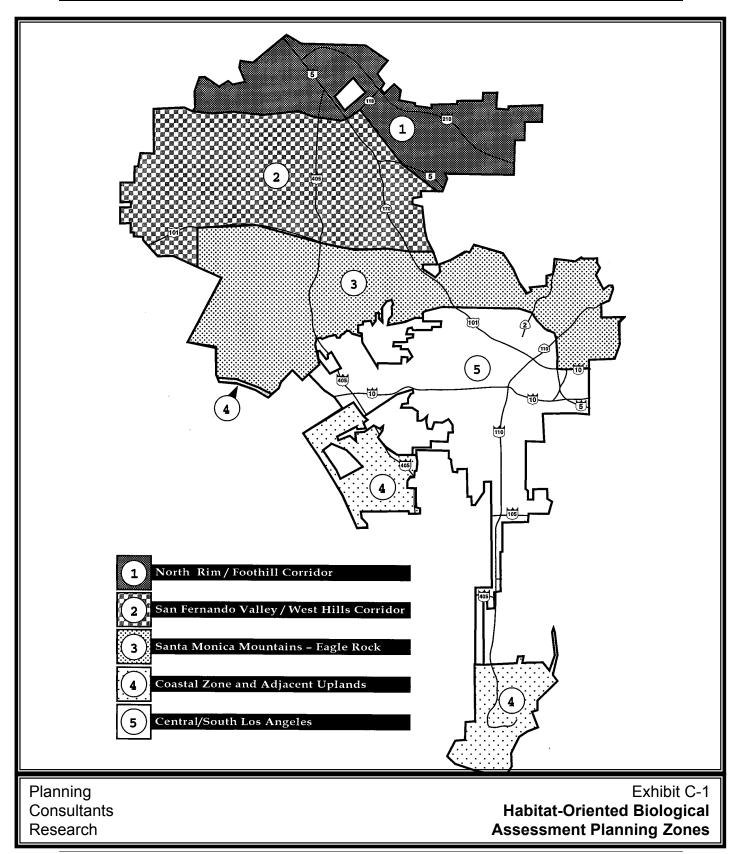
California Endangered Species Act, Fish and Game Code, Division 3, Chapter 1.5.

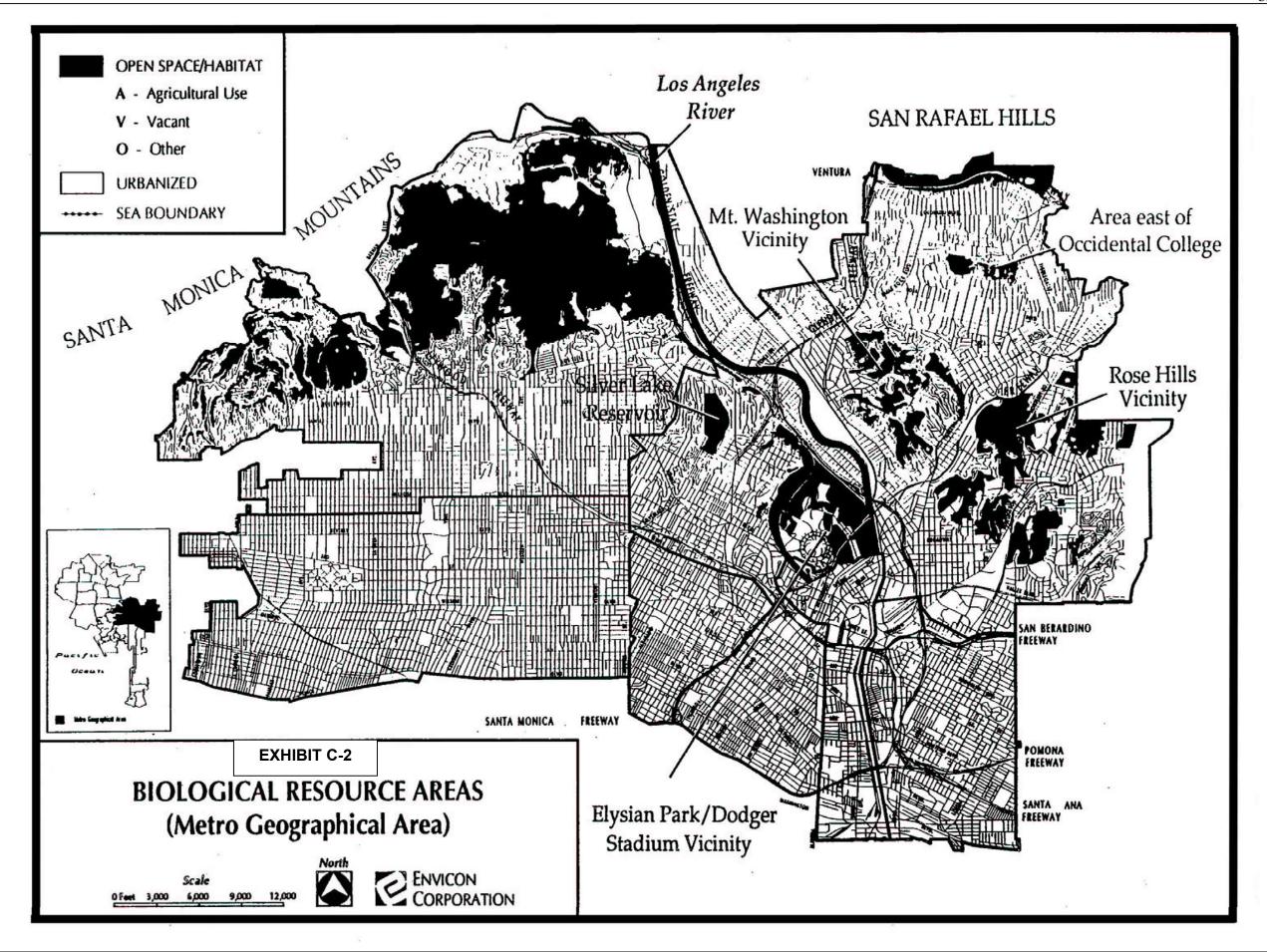
Declares that these species of fish, wildlife, and plants are of ecological, educational, historical, recreational, esthetic, economic, and scientific value to the people of this state, and the conservation, protection, and enhancement of these species and their habitat is of statewide concern. Provides for a state list of endangered and threatened species by the Fish and Game Commission and restricts activities that may impact these species.

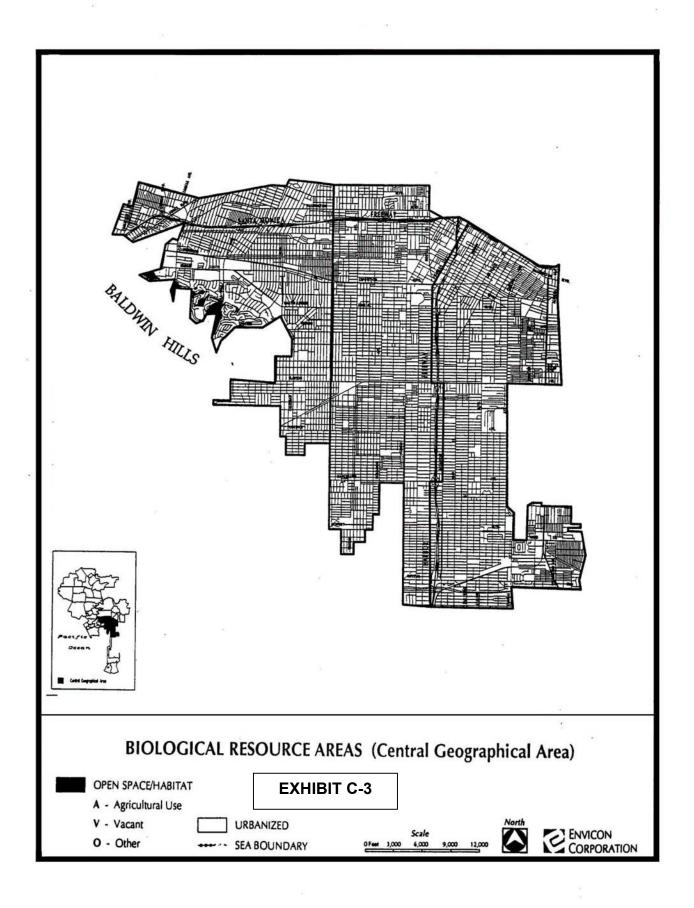
City of Los Angeles

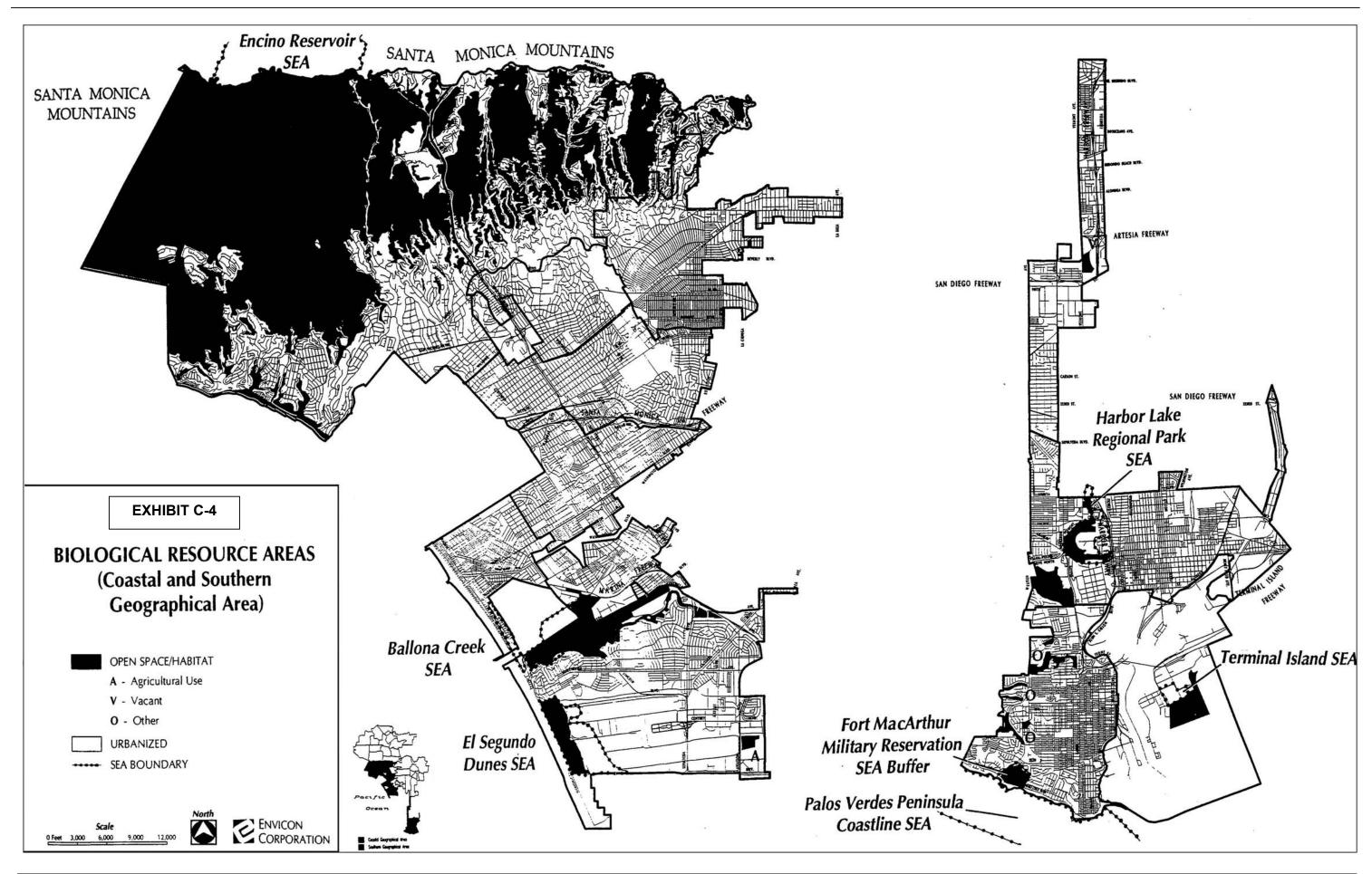
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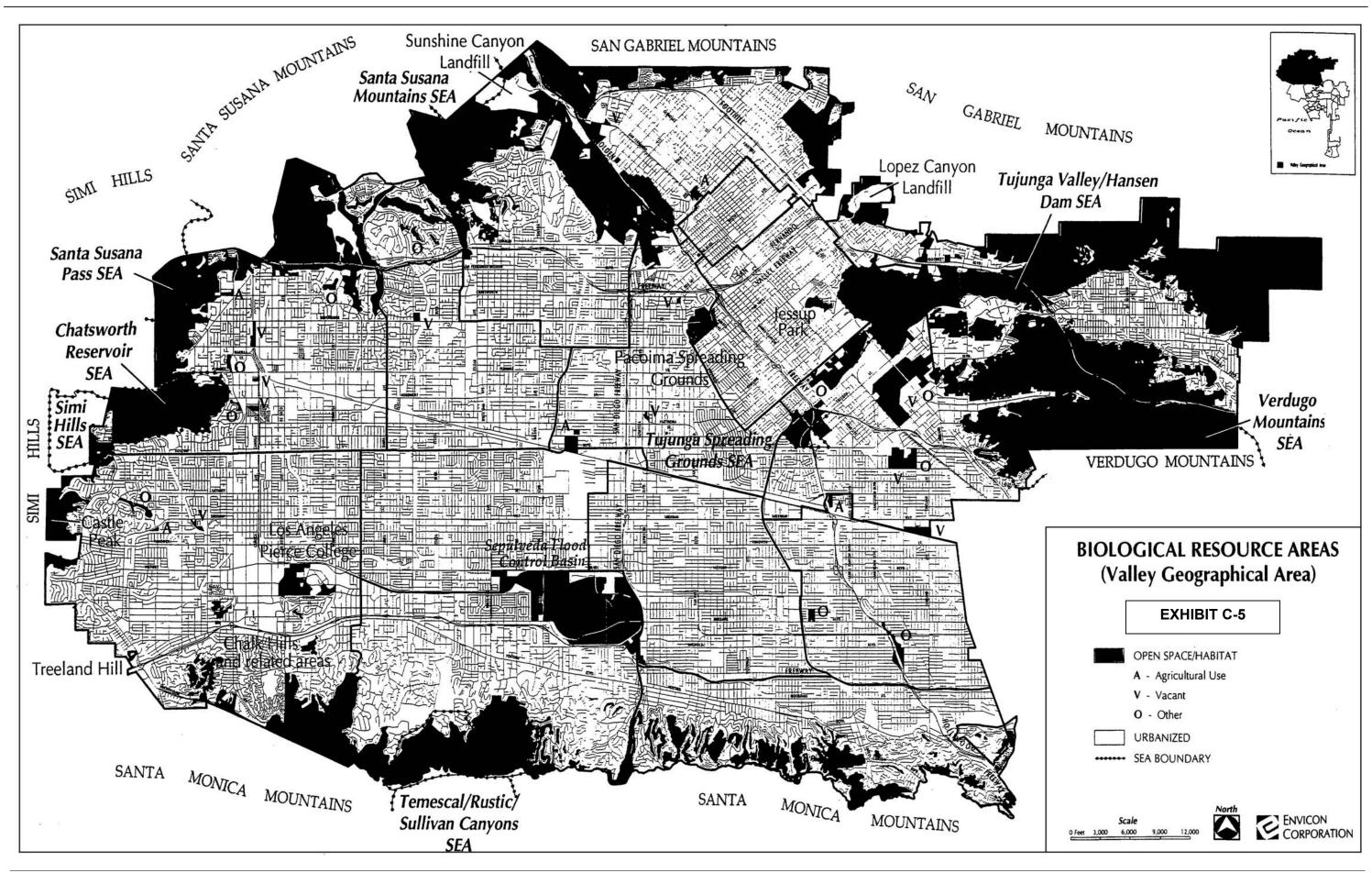


Exhibit C-6 NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

The following discusses the open space resources and SEAs in each of the eleven Planning Subregions of the City, starting in the north and proceeding generally south. Within each subregion, the mapped open spaces and habitats they contain are briefly discussed, and the reader is referred to those general and site-specific accounts of biological resources that were found applicable to each subregion. Often, an open space area occurs in more than one subregion (e.g. Santa Monica Mountains). Such occurrences are discussed separately in each case, but in greatest detail when first encountered in the discussion. Therefore, the reader may find reference in the discussion to a prior description of an open space area in an earlier subregion. There is additional information about SEAs at the end of this section.²

Northwest Valley Planning Subregion

<u>Chatsworth Reservoir SEA</u>. The Chatsworth Reservoir is owned by the Los Angeles Department of Water and Power, and abuts the foot of the Simi Hills in the Western San Fernando Valley. A variety of habitats are present here, including grassland, oak woodland and savannah, freshwater marsh and open water, which offer important wintering and breeding grounds for songbirds and waterfowl (England and Nelson, 1976). The Chatsworth reservoir is one of five areas in the San Fernando Valley that is used regularly by wintering Canada Geese (*Branta canadensis*). Many-stemmed dudleya (*Dudleya multicaulis*) is reported in rocky areas on the south side of the reservoir (NDDB, 1994).

Simi Hills and Simi Hills SEA, and Santa Susana Pass SEA. The Simi Hills are generally located north of the Ventura Freeway (US 101), south of the Simi Valley Freeway (SR 118), and west of the San Fernando Valley. As such, they lie largely outside of the City boundary, and are mostly within Ventura County. However, portions of its eastern flank bordering the western San Fernando Valley from the vicinity of Castle Peak to Santa Susana Pass lie within the City. Wieslander (1934) mapped the vegetation of this region between 1927 and 1933. Wiekel (1983) has prepared a biological inventory and mapping for this area, although additional specific biological resource inventories of the Simi Hills within the City and County of Los Angeles are generally lacking. A survey over the areas of Dayton and Woolsey Canyons (Envicom Corp., 1990) in the Simi Hills just east of the Chatsworth Reservoir is the best representative inventory available for the eastern Simi Hills. Habitats present include grassland, coastal scrub, chaparral, riparian and oak woodland, and limited areas of walnut woodland. The state-listed Rare Santa Susana tarplant

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¹ Reprinted from the EIR for the Framework Element.

SEA boundaries are established by Los Angeles County. The current legal boundaries and status should be verified.

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

(Hemizonia mint Jionii) is prevalent in the sandstone outcrops, and Humboldt lily (Lilium humboldtii ocellatum) occurs in the under story of riparian woodland in upper Dayton Canyon.

The Simi Hills SEA is almost entirely within the unincorporated area of Los Angeles County, with only a small fraction extending into the City. The remaining portions of this SEA are located west of Chatsworth Reservoir and Valley Circle Boulevard, and north and south of Lakeside Park (a residential community). Santa Susana tarplant occurs adjacent to Valley Circle Boulevard in the northern area (Wishner, personal observation, 1990). The Simi Hills SEA contains representative examples of chaparral, coastal scrub, southern oak woodland and riparian woodland, and the area also serves as a wildlife corridor for movement between the Chatsworth Reservoir SEA and the large, undeveloped portions of the Simi Hills in Ventura County to the west (England and Nelson, 1976).

The southern portion of the Santa Susana Pass SEA that is located south of the Simi Valley Freeway (SR 118) is actually located in the Simi Hills, within the City of Los Angeles (the remainder of the SEA north of the freeway is in the Santa Susana Mountains, and outside the City boundary). The Santa Susana Pass SEA is an important wildlife movement zone between the Santa Susana Mountains and the Simi Hills (England and Nelson 1976), which is referred to as the "primary Simi Valley Freeway habitat linkage" by Edelman (1991). Intact crossings for large mammals include the Rocky Peak Road freeway overpass (just outside City/County line). Habitats encompassed by the Santa Susana Pass SEA (within the City) include chaparral, coastal scrub, grassland, oak woodland, and riparian woodland. The SEA also contains concentrations of Santa Susana tarplant, which is associated with sandstone outcrops in chaparral and coastal scrub habitats.

Discrepancies between the original boundaries recommended (England and Nelson, 1976) and adopted by the County of Los Angeles and the extent of open space habitat for plants and animals shown on Exhibits C-2 through C-5, are the result of "deletions" of areas from the SEA as they have become developed.

Santa Susana Mountains and Santa Susana Mountains SEA. The Santa Susana Mountains form an open-space link between the San Gabriel Mountains (northeast) and the Simi Hills and Santa Monica Mountains (southwest). With the exception of a resource inventory and mapping prepared by Wiekel (1983) and bird lists for O'Melveny Park (Martin, 1992), specific biological resource accounts of the Santa Susana Mountains are generally lacking. The range does support grassland, chaparral, oak woodland and savanna, riparian woodland, and big-cone spruce woodland (latter on the north slope only).

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A small, eastern extension of the Santa Susana Mountains SEA is located within the City boundary, although much of the former SEA here is occupied by the Sunshine Canyon Sanitary Landfill.³ Habitats of the Santa Susana Mountains SEA include grassland, coastal sage scrub, chaparral, oak woodland and savannah, and riparian woodlands (England and Nelson, 1976). Porter Ranch is also included in this geographic region.

Van Norman Reservoir and vicinity. This large open space area in the northern San Fernando Valley receives water via aqueduct over the San Fernando Pass--the divide between the Santa Susana and San Gabriel Mountains. The size of the reservoir containing open water was substantially reduced following the Sylmar earthquake in 1971, when the lower dam was drained. As a result, portions of that area have recovered to form willow forest habitat. Upland portions of the reservoir area support grassland and coastal scrub vegetation. The area is one of five, which are regularly used by wintering Canada geese. To the south and adjacent to the reservoir are agricultural lands, a cemetery, a parcel containing remnant grassland, coastal scrub and oak woodland, and several vacant lots. These form a cohesive unit, which offers resources for plants and animals as an adjunct to the reservoir site. Across the Golden State Freeway (I-5) from the Van Norman Reservoir (in the Northeast Valley subregion) is a substantial area of grassland, coastal scrub, and small open water habitat, which adds to the effective size and resource value of the reservoir site.

<u>Pacoima Spreading Grounds</u>. This area of storm water runoff collection located southwest of the junction of the Golden State Freeway (I-5) and the Simi Valley Freeway (SR 118) is divided approximately in half between the Northwest and Northeast Valley Planning Subregions. It supports marsh-like habitat when ponding occurs (City of Los Angeles, 1989), and offers opportunities for migrating waterfowl and shorebirds.

Northeast Valley Planning Subregion

<u>San Gabriel Mountains</u>. This subregion contains portions of the foothills of the San Gabriel Mountains bordering the San Fernando Valley and extending from the western end of the range eastward to Pacoima Canyon, Lopez Canyon, Little Tujunga Canyon and Big Tujunga Canyon. From there, the City includes the foothills of the range bordering on the San Gabriel Valley eastward to approximately Hines Canyon, and extending upward into the mountains to the vicinity of Mount Lukens. Biological resources of the San Gabriel Mountains are discussed generally (Hanes, 1976; Schoenherr, 1976 and 1992; USDA:FS, 1987; Long, 1994), but specific biological accounts of areas

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The footprint of the landfill shown in Exhibit C-2 is as of November 1992, and does not reflect the expansion which has occurred since that date.

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAS) WITHIN THE CITY OF LOS ANGELES¹

within the City [with the exception of detailed vegetation maps prepared by Wieslander (1934)] are limited to project-related environmental impact reports and sensitive species records in the Natural Diversity Data Base. Habitats evident in the City boundary on aerial photographs include primarily coastal scrub and chaparral, and limited areas of oak and riparian woodlands, and grasslands.

Verdugo Mountains and Verdugo Mountains SEA. The City includes the entire northwestern end of this mountain range bordering the San Fernando Valley and the San Gabriel Valley. This geographic location makes the Verdugo Mountains an important habitat linkage between the San Gabriel Mountains to the north, and the Santa Monica Mountains to the south (England and Nelson, 1976). Both general and specific accounts of biological resources therein are lacking or limited to project-related environmental impact reports or accounts of sensitive species, and the detailed vegetation maps of the area prepared by Wieslander in 1934. As shown on aerial photographs, habitats present in these mountains include grassland, coastal scrub, chaparral, riparian and oak woodlands.

A substantial portion of the Verdugo Mountains SEA lies within the City, while the remainder is within the corporate boundaries of Burbank and Glendale. Although England and Nelson (1976) indicate "considerable information exists on the area," this information was not available for preparation of the General Plan Framework EIR.

Tujunga Valley/Hansen Dam Park SEA. The Tujunga Valley occupies the floodplain of Big Tujunga Canyon. Hansen Dam is a flood control basin receiving stream discharge from Lopez, Kagel, Little Tujunga, and Big Tujunga Canyons. The floodplain behind Hansen Dam (Hansen Dam Park) supports one of the last examples of alluvial scrub vegetation in the freshwater marsh, willow forest and scrub. Alluvial scrub is habitat for the state-listed Endangered Nevin's barberry (Berberis nevinii) and the state- and federally-listed Endangered slender-horned spineflower (Dodecahema leptoceras), which have been found here (England and Nelson, 1976; City of Los Angeles, 1989a). Long (1994) has prepared a list of plants and birds occurring at the Tujunga Ponds. The park reportedly (City of Los Angeles 1989) supports a south coast minnow/sucker stream which sustains native populations of arroyo chub (Gila orcutti) and Santa Ana sucker (Catostomus santaanae). Swift et al. (1993) report that arroyo chub remains common in Big Tujunga, whereas Pacific speckled dace (*Rhinichthys oscrilus*) and Santa Ana sucker have become scarce and perhaps extirpated. Areas to the southwest (below the dam) are used as a spreading ground for groundwater

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

recharge, which has created several freshwater marsh areas used by marsh birds, migratory waterfowl, and shorebirds (England and Nelson, 1976).⁴

<u>Jessup Park</u>. A small area of chaparral, coastal scrub and grassland habitats (as evident on aerial photographs) occurs just west of Hansen Dam Park--No specific details of biological resources present could be found in the available literature.

<u>Tujunga Spreading Grounds SEA</u>. This SEA is located in the Tujunga Wash downstream from Hansen Dam, at the juncture of the Golden State Freeway (I-5) and the Hollywood Freeway (SR 170). Although it contains little natural vegetation, it is an area of ponded water serving as an important nesting, feeding and resting ground for many migrating, resident and wintering bird species (England and Nelson, 1976).

<u>Pacoima Spreading Grounds</u>. This area of storm water runoff collection located southwest of the junction of the Golden State Freeway (I-5) and the Simi Valley Freeway (SR 118) is divided approximately in half between the Northwest and Northeast Valley Planning Subregions. It supports "marsh-like habitat" when ponding occurs (City of Los Angeles, 1989), and offers opportunities for migrating waterfowl and shorebirds

<u>Van Norman Reservoir vicinity</u>. Across the Golden State Freeway (I-5) from the Van Norman Reservoir (in the adjacent Northeast Valley subregion) is a substantial area of grassland, coastal scrub, and small open water habitat, which adds to the effective size and resource value of the reservoir site.

Southwest Valley Planning Subregion

Santa Monica Mountains and Encino Reservoir SEA. The biological resources of the Santa Monica Mountains are considered in general (Raven et al., 1986; Othmer, 1980; USDI:NPS, 1982; De Lisle et al., 1986). Wielander (1934) mapped the vegetation in detail between 1927 and 1933. Aside from project-related environmental impact reports and accounts of sensitive species, specific details are generally lacking. The subregion includes portions of the north slope of the range from the vicinity of Topanga Canyon Boulevard (south of US 101) eastward to the Sepulveda Pass (San Diego Freeway; I-405). As evidenced on aerial photographs, habitats in the area include mostly chaparral, but also oak and riparian woodland, and small amounts of grassland, coastal scrub and

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⁴ The SEA boundary shown on Exhibit C-2 is as originally proposed by England and Nelson (1976). A portion of the area was "redesignated to open space," therefore, not adopted as SEA under the Los Angeles County General Plan.

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

walnut woodland. A small portion of Topanga State Park is included in upper Caballero (Reseda) Canyon, with the bulk occurring in the West Los Angeles subregion.

The Encino Reservoir SEA contains "the best stand of inland chaparral, coastal scrub and streamside vegetation remaining on the inland slope of the Santa Monica Mountains" (England and Nelson, 1976). In addition, the reservoir itself is an open, fresh water habitat. Along with Chatsworth Reservoir, the Sepulveda Basin, Van Norman Reservoir, and Los Angeles Pierce College, the Encino Reservoir is an important wintering ground for Canada geese.

Simi Hills and Simi Hills SEA. The Simi Hills are represented in this subregion by small areas at the western end of the San Fernando Valley, with the majority occurring in the Northwest Valley subregion. As discussed for that subregion, with the exception of an inventory and mapping by Weikel (1983), general and specific accounts of biological resources of the range are lacking. As evidenced by aerial photographs, the area within the City and subregion support grassland, chaparral, coastal scrub, oak and riparian woodland, and walnut woodland. Castle Peak⁵ is a prominent rocky peak that is a major roosting site for great horned (*Bubo virginianus*) and barn owls (*Tyto alba*), and probably a hibernaculum for one or more species of bats (Wishner, personal observation, 1987). None of the Simi Hills SEA occurs in the Southwest Valley subregion.

Los Angeles Pierce College. The campus of the former Clarence W. Pierce School of Agriculture retains a substantial amount of agricultural open space that is attractive to wintering Canada geese. As such, it is one of only five areas in the San Fernando Valley where Canada geese can forage. The recently-graded (fall 1993) Warner Ridge property adjacent to the west side of the Campus was also used by geese in the winter of 1994, since the area supported a dense growth of young grasses following the grading (Wishner, personal observation, 1994). In addition to the agricultural lands at Pierce College, the campus also contains an outdoor Nature Center with a pond and surrounding hillsides supporting grassland, and an arboretum. A number of sensitive or unusual bird species occur on the campus, especially in winter, and it is a popular location during the annual Christmas Bird Count conducted by the Audubon Society. The hilly portions of the campus represent an extension of the Chalk Hills discussed below.

<u>Chalk Hills and related areas</u>. The Chalk Hills in Woodland Hills are a privately-owned, small island of grassland vegetation south of the Ventura Freeway (US 101) in the foothills of the Santa Monica Mountains. Close proximity to these mountains enables this area to support wildlife species

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⁵ Castle Peak is located west of Valley Circle Boulevard between Vanowen St. and Bell Canyon Rd.

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAS) WITHIN THE CITY OF LOS ANGELES¹

including coyote (Canis latrans), bobcat (Felis rufies), western harvest mouse (Reithrodontomys megalotis), and California quail (Callipepla californica). Barn owls, great horned owls, red-tailed hawks (Buteo jamaicensis) and American kestrel (Falco sparverius) are resident in the trees of the surrounding neighborhood and forage in the grassland. The site is the only location of squarestemmed buckwheat (Eriogonum angulosum) in the Santa Monica Mountains zone. Similar, geologically-related areas occur between the Chalk Hills and Pierce College, and to the west of Topanga Canyon Boulevard both to the north and south of the Ventura Freeway (US 101), and again on the western edge of the subregion at Boething's Treeland Nursery.

Sepulveda Flood Control Basin. The Los Angeles River and tributaries draining the western San Fernando Valley discharge into the Sepulveda Basin. A variety of open space land uses occur here including agriculture, wastewater treatment, outdoor recreation, and an outdoor nature center. The area is one of only five areas of the San Fernando Valley that is regularly used by wintering Canada geese. The area also includes grassland and open water habitats, as well as two lakes (one is concrete lined), and a segment of riparian woodland on the river. The basin is a popular location for the annual Christmas Bird Count conducted by the Audubon Society. A portion of the Sepulveda Basin has been restored to attract migratory waterfowl and other wildlife.

Southeast Valley Planning Subregion

No substantial areas of natural habitat for plants and animals are evident on aerial photographs covering this subregion. Although the Los Angeles River passes through this area, it is a verticalwalled, concrete-lined segment of the stream.

Metro Center Planning Subregion

Santa Monica Mountains and Griffith Park SEA. Griffith Park, located at the east end of the Santa Monica Mountains, supports coastal scrub, chaparral, riparian and oak woodland habitats. The area also includes the Hollywood Reservoir. England and Nelson (1976) consider Griffith Park an important "island" rest stop for migrating birds, as well as a "reservoir for native species" and "corridor" for wildlife movement between the Santa Monica Mountains and San Gabriel Mountains, via the Verdugo Mountains. The Department of Recreation and Parks manages a portion of the Park as a bird sanctuary.

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Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

Central Los Angeles Planning Subregion

No substantial areas of natural habitat for plants and animals are evident on aerial photographs covering this subregion. Although the Los Angeles River passes through this area, it is a verticalwalled, concrete-lined segment of the stream.

Northeast Los Angeles Planning Subregion

Los Angeles River. The river in this subregion is a concrete-lined conveyance channel, although a five-mile stretch of the river from Griffith Park to the Golden State (I-5) and Pasadena (SR 11) Freeway interchange contains a natural bottom (City of Los Angeles, 1991). The river is perennial below the Sepulveda Basin since 1985 as a result of the discharge of tertiary-treated wastewater from the Tillman Reclamation Plant. A limited amount of riparian scrub vegetation is present in the bed of the river, subject to scouring and reappearance elsewhere in the shifting bottom sediments.

Elysian Park/Dodger Stadium. Undeveloped portions of this area support chaparral and oak woodland vegetation, as evident on aerial photography. No specific details of biological resources present there could be found in the literature.

Mount Washington and vicinity. In the area east of the Golden State Freeway (I-5) and between the Glendale (SR 2) and Pasadena (SR 11) Freeways, there occurs a number of small pockets of grassland and coastal scrub habitat in the mountainous area in the vicinity of Mount Washington. No specific details of biological resources present there could be found in the literature.

Areas east of Occidental College. Small pockets of grassland and coastal scrub habitats remain in the mountainous area just to the east of Occidental College. No specific details of biological resources present there could be found in the literature.

Rose Hill/Arroyo Seco Parks and Vicinity. Areas of remnant grassland habitat occur at Rose Hill Park and Arroyo Seco Park, and in the mountainous terrain to the south and east. Included here is also the open water habitat of Ascot Reservoir. No specific details of the biological resources present there could be found in the literature.

Silverlake and Ivanhoe Reservoirs. These reservoirs located west of the Golden State (I-5) and Glendale (SR 2) freeway interchanges are concrete-lined open water habitats with some waterfowl use.

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Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAS) WITHIN THE CITY OF LOS ANGELES¹

San Rafael Hills. The San Rafael Hills represent a southeastward extension of the Verdugo Mountains. A small portion of the foothills on the southern flank of these mountains and on both sides of the Foothill Freeway (I-210) occurs within this subregion. As evident on aerial photographs, the primary habitat type present is chaparral.

South Los Angeles Planning Subregion

No substantial areas of natural habitat for plants and animals are evident on aerial photographs covering this subregion.

Southwest Los Angeles Planning Subregion

El Segundo Dunes SEA. Located west of the runways of the Los Angeles International Airport, the El Segundo Dunes SEA is the last remnant of a coastal dune system that once stretched several miles in each direction from here (England and Nelson, 1976). A substantial portion of the original SEA has been deleted due to airport expansion. The present SEA borders a portion of Dockweiler Beach State Park. The vegetation found here, referred to as coastal dune scrub, occurs nowhere else in the County. The dunes support the entire world population of the El Segundo Blue butterfly (Euphilotes battoides allyni), a federally listed endangered species. Much of the area has been disturbed by a former residential development, but the area is currently undergoing restoration. The specific biological resources of the El Segundo Dunes are discussed by Mattoni (1990).

Ballona Wetlands and Ballona Creek SEA. The Ballona Wetlands, located just north of the El Segundo Dunes, are privately owned and subject to a future restoration (ca. 280 acres) of the area to tidally influenced coastal saltmarsh under the Playa Vista Plan (City of Los Angeles, 1992; Mattoni, 1990a). The specific biological resources of the Ballona region have been investigated in some detail (Dailey et al., 1974; Envicom Corp., 1979; Schreiber, 1981; Jones and Stokes Associates 1981; Corey, 1990; Corey and Massey, 1990; Allen, 1991; Carter, 1991; Henrickson, 1991; Mattoni, 1991; Soltz, 1991). Habitats present include coastal saltmarsh willow woodlands, freshwater marsh, coastal dunes, and coastal scrub. The Ballona Creek SEA, generally encompassing the Ballona Wetlands, is one of two remaining remnants of coastal saltmarsh habitat in Los Angeles County (England and Nelson, 1976), and is used as a breeding ground for several state-listed Endangered species including Belding's savanna sparrow (Passerculus sandwichensis beldingi), California least tern (Sterna antillarum browni), saltmarsh skipper (Panoquina errans), and saltmarsh harvest mouse (Sorex ornatus salicornicus).

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Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

<u>Baldwin Hills</u>. The Baldwin Hills support coastal scrub and grassland communities, reportedly containing plant species now found only at the edge of the Los Angeles Metropolitan area and on the desert side of the San Gabriel Mountains (England and Nelson, 1976)⁶. According to these authors, they are "one of the last remaining open spaces in the western portion of the Los Angeles Basin."

West Los Angeles Planning Subregion

Santa Monica Mountains including Topanga State Park. The largest portions of the Santa Monica Mountains that are contained within the City occur in this subregion. The biological resources of the Santa Monica Mountains are considered in general (Raven et al., 1986; Othmer, 1980; USDI:NPS, 1982; De Lisle et al., 1986). Wieslander (1934) mapped the vegetation in detail between 1927 and 1933. Muns (1983) has compiled a flora for Topanga State Park. Aside from project-related environmental impact reports and accounts of sensitive species, specific details are generally lacking. The subregion includes the south slopes of the range from Topanga State Park eastward to Laurel Canyon. As evidenced on aerial photographs, habitats in the area include mostly chaparral, but also coastal scrub, oak and riparian woodland, and small amounts of grassland.

<u>Will Rogers State Park Beach coastline</u>. In the Pacific Palisades, sandy beach as well as rocky and sandy intertidal zones offer habitat for shorebirds.

<u>Stone Canyon Reservoir</u>. There are actually two reservoirs here. The upper reservoir is concrete-lined, and the lower one is larger, with natural banks. The area provides habitat for waterfowl, and also support a small area of walnut woodland.

Harbor Planning Subregion

<u>Palos Verdes Peninsula Coastline SEA</u>. The City includes the eastern portion of this SEA from near Cabrillo Beach Park/Point Fermin westward to the City boundary. The Fort MacArthur Military Reservation is included as a buffer for the SEA. The shoreline encompasses headlands, rocky shoreline, sandy beaches, intertidal areas, kelp beds, coastal strand, and coastal scrub vegetation (England and Nelson, 1976). The coastal cliffs and offshore rocks offer roosting and feeding sites for shorebirds, gulls and other seabirds including the state- and federally-endangered brown pelican. The state- and federally-listed Endangered peregrine falcon (*Falco peregrinus*

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This area was originally considered as a potential SEA in 1976, however, most of the area was "redesignated to open space", and has subsequently been incorporated into the Kenneth Hahn State Recreation Area (Koutnik, personal communication, Oct. 6, 1994).

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAs) WITHIN THE CITY OF LOS ANGELES¹

anatum), and Species of Special Concern prairie falcon (Falco mexicanus) are reported to winter along bluff tops in this area.

<u>Harbor Lake Regional Park SEA</u>. Harbor Lake Regional Park, located northwest of the junction of the Harbor Freeway (SR 110) and Anaheim Boulevard, supports one of two remaining wetland areas that once covered the South Bay area (the other area is Madrona Marsh, outside the City) (England and Nelson, 1976). Habitats present include willow forest, freshwater marsh and open water habitats, which support frogs, toads, water-dependent birds, and migratory birds. The Harbor Lake area is noted for the number of songbirds found there during migration, including many which are outside their normal ranges (so-called "vagrants").

<u>San Pedro Harbor</u>. This area is heavily used for shipping traffic and recreational activities (i.e., jet skis and boating). Some biological value does remain in the harbor, particularly along the northern part of the jetty separating the harbor from the open ocean. Of special interest is the sandy beach on the ocean-side of the jetty adjacent to Cabrillo Park, where grunion (*Leuresthes tenuis*) spawn in spring on nights of high tides following a full moon. The harbor also provides habitat for fish and water birds. The heavy human activity in the area has reduced the value of the harbor to wildlife.

Significant Ecological Areas (SEAs)

The County of Los Angeles, through its General Plan, established 61 Significant Ecological Areas (SEAs), which represent a wide variety of biological communities within the County. The SEAs function to preserve this variety and to provide a level of protection to the resources within them. These SEAs are living laboratories containing examples of the County's diverse ecological heritage. SEAs are intended to be preserved in an ecologically viable condition for the purposes of public education, research, and other non-disruptive outdoor uses but do not preclude limited compatible development. The County General Plan outlines a process to regulate land uses in these areas and creates an advisory committee of scientists appointed to oversee the regulation of these policies.

A conditional use permit is required for development in SEAs in order to protect resources contained in SEAs from incompatible development, which may result in or have potential for environmental degradation⁷. A biological constraints analysis is required to describe in a general manner the extent, location, and sensitivities of ecological resources found within an SEA.

⁷ Section 22.56.215 of the County Code.

Exhibit C-6, continued NATURAL HABITATS AND SIGNIFICANT ECOLOGICAL AREAS (SEAS) WITHIN THE CITY OF LOS ANGELES¹

Development proposed within a designated SEA is subject to review based on design compatibility criteria provided to guide specific land use decisions.

The SEAs are classified into the following eight categories:

- Class 1 The habitat of state and federally listed endangered, rare, or threatened plants and animals
- Class 2 -Biotic communities, vegetative associations, and habitats of plants and animal species that are either one of a kind, or are restricted in distribution on a regional basis.
- Class 3 -Biotic communities, vegetative associations, and habitats of plants and animal species that are either one of a kind, or are restricted in distribution in Los Angeles County.
- Class 4 Habitat that serves, at some point in the life cycle of a species or group of species, as a concentrated breeding, feeding, resting, or migrating grounds, and is limited in availability.
- Class 5 -Biotic resources that are of scientific interest because they either are at an extreme in the physical or geographic range of a population of community, or they represent an unusual variation in a population or community.
- Class 6 Areas important as game habitat or fisheries resources.
- Class 7 Areas that would preserve relatively undisturbed examples of natural biotic communities in Los Angeles County.
- Class 8 Special areas, not meeting the above criteria, but that have some notable biological features (such as a wildlife corridor) can also be designated as SEAs.

Exhibit C-7 SENSITIVE SPECIES COMPENDIUM - CITY OF LOS ANGELES¹

KEY

State Status - California Department of Fish and Game (CDFG)			
SE	State Listed Endangered		
ST	State Listed Threatened		
CSC	Species of Special Concern ²		
SCE	State Candidate Endangered		
SCT	State Candidate Threatened		
SFP	State Fully Protected		
SP	State Protected		
SR	State Listed Rare		
Federal Status - U	.S. Fish and Wildlife Service (USFWS)		
FE	Federally Listed Endangered		
FT	Federally Listed Threatened		
FCH	Federally Listed Critical Habitat		
FPE	Federally Proposed Endangered		
FPT	Federally Proposed Threatened		
FPCH	Federally Proposed Critical Habitat		
FPD	Federally Proposed Delisting		
FC	Federal Candidate Species		
EXT	Extinct		

¹ This list is current as of January 2001. Check the most recent state and federal lists for updates and changes, or consult the CDFG's California Natural Diversity Database.

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² CSC - California Special Concern species. The Department has designated certain vertebrate species as "Species of Special Concern" because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. The goal of designating species as "Species of Special Concern" is to halt or reverse their decline by calling attention to their plight and addressing the issues of concern early enough to secure their long term viability. Not all "Species of Special Concern" have declined equally; some species may be just starting to decline, while others may have already reached the point where they meet the criteria for listing as a "Threatened" or "Endangered" species under the State and/or Federal Endangered Species Acts.

KEY (continued)

Califo	California Native Plant Society (CNPS)			
1A	Plants presumed extinct in California ³			
1B	Plants that are rare, threatened, or endangered in California or elsewhere ³			
2	Plants that are rare, threatened, or endangered in California, but more common elsewhere ³			
3	Plants about which more information is needed - a review list ⁴			
4	Plants of limited distribution - a watch list ⁵			
Habit	at Code Designations - California Natural Diversity Database (CNDDB)			
AF	Alluvial Fan Sage Scrub			
BW	Brackish Water			
СВ	Coastal Bluff Scrub			
CD	Coastal Dunes			
СН	Chaparral			
CL	Coastal Lagoon			

³ All of the plants constituting Lists 1A, 1B, and 2 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endatnered Species Act) of the California Department of Fish and Game Code, and are eligible for listing. According to the DFG, if the taxa on List 1A are rediscovered, they should be fully considered during preparation of environmental documents relating to CEQA. List 1B and 2 plants should be fully considered during preparation of environmental documents relating to CEQA.

⁴ Some of the plants constituting List 3 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and are eligible for listing. The DFG recommends that List 3 plants be evaluated for consideration during preparation of environmental documents relating to CEQA.

⁵ Very few of the plants constituting List 4 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and few, if any, are eligible for listing. Nevertheless, many of them are significant locally, and the DFG recommends that List 4 plants be evaluated for consideration during preparation of environmental documents relating to CEQA. This may be particularly appropriate for the type locality of a List 4 plant, for populations at the periphery of a species' range or in areas where the taxon is especially uncommon or has sustained heavy losses, or for populations exhibiting unusual morphology or occurring on unusual substrates.

KEY (continued)

Habita	at Code Designations - California Natural Diversity Database (CNDDB) (Con't)
CM	Coastal Salt Marsh
СО	Coastal Habitats
СР	Chenopod Scrub
CS	Coastal Sage Scrub
DR	Desert Riparian
DW	Desert Wash
ES	El Segundo Dunes
ET	Estuary
FM	Freshwater Marsh
GL	Grassland (native or introduced)
MF	Montane Forest (mixed hardwood, coniferous)
OW	Oak Woodland (coast live, valley, canyon or scrub oaks)
PJ	Pinyon-Juniper Woodland
PL	Playa Habitats, coastal or inland
RP	Riparian Scrub
RV	Rivers (open water or aquatic habitats)
RW	Riparian Woodland
SG/S J	San Gabriel/San Jacinto Mountains
VP	Vernal Pools
WA	Water (general open water habitats)

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Invertebrates				
Euphilotes battoides allyni	El Segundo blue butterfly	FE	4	CD
Glaucopsyche lygdamus palosverdesensis	Palos verdes blue butterfly	FE, FCH	4	CS
Raphiomidas t. terminatus	El Segundo flower-loving fly	EXT	4	ES
Streptocephalus woottoni	Riverside fairy shrimp	FE, FPCH	4	СН
Fish				
Catostomus santaanae	Santa Ana sucker	CSC, FT	1,3	RV
Eucyclogobius newberryi	tidewater goby	CSC, FE, FPD, FCH	4	BW
Gasterosteus aculeatus williamsoni	unarmored threespine stickleback	FE, FPCH, SE, SFP	Unknown	
Gila orcutti	arroyo chub	CSC	1,2,3,4	RV
Onchorhynchus mykiss	southern steelhead	FE, FCH, CSC	Unknown	
Rhinichthys osculus ssp. 3	Santa Ana speckled dace	CSC	1	RV
Amphibians				
Bufo microscaphus californicus	arroyo southwestern toad	CSC, SP, FE, FCH	1,2,3,4	RV, DR
Rana aurora draytoni	California red-legged frog	FT, FPCH, CSC, SP	1,2,3,4	
Rana muscosa	So. California population of mountain yellow-legged frog	FPE, CSC, SP	1,2,3,4	
Scaphiopus hammondii	western spadefoot toad	CSC, SP	1	VP, RV, CS, CH
Reptiles				
Anniella p. pulchra	silvery legless lizard	CSC	1,2,3,4	CH, OW, CS
Clemmys marmorata pallida	southwestern pond turtle	CSC, SP	1,2,3,4	RV
Lampropeltis zonata pulchra	San Diego mountain kingsnake	CSC, SP	1,2,3	CH, CS, OW
Phrynosoma coronatum blainvillei	San Diego horned lizard	CSC, SP	1,2,3,4	CS, CH, AF
Salvadora hexalepis virgultea	coast patch-nosed snake	CSC	1,2,3,4	CS, CH, OW
Thamnophis (Nerodia) hammondii	two-striped garter snake	CSC, SP	1,2,3,4	RV, FM
Xantusia riversiana	island night lizard	FT, SP	1,2,3,4	

^{*} Refer to Exhibit C-1.

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Birds				
Accipiter cooperii	Cooper's hawk (nest)	CSC	1,2,3,4	RW, OW
Accipiter striatus (migrant)	sharp-shinned hawk (nest)	CSC	1,2,3,4	RW
Aimophila ruficeps canescens	So. Cal.rufous-crowned sparrow	CSC	1,2,3,4	CS, CH
Amphispiza b. belli	Bell's sage sparrow	CSC	1,2,3,4	CS, CH
Asio flammeus	short-eared owl	CSC	3,4	CM, FM
Asio otus	long-eared owl	CSC	1,2,3,4	OW, RP
Athene cunicularia hypugea	burrowing owl	CSC	1,2,3,4	GL, DW, CS, CB
Charadrius alexandrinus nivosus	western snowy plover	FT, FCH, CSC	4	PL, ET, CD
Charadrius montanus	mountain plover	FPT, CSC	1,2,3	
Chlidonias niger	black tern	CSC	4	PL, CO, ET
Circus cyaneus	northern harrier (nest)	CSC	1,2,3,4	FM, ET, CM
Coccyzus americanus occidentalis	western yellow-billed cuckoo	SE	1,2,3,4	RW
Cypseloides niger (migrant)	black swift (nest)	CSC	1,2,3,4	RV, waterfalls
Dendroica petechia brewsteri	yellow warbler (nest)	CSC	1,2,3,4	RP, RW, CH
Elanus leucurus	white-tailed kite	SFP	1,2,3,4	GL, ET, FM, OW
Epidonax traillii	willow flycatcher (all subspecies)	SE	1,3	RW, RP
Epidonax traillii extimus	Southwestern willow flycatcher	FE, FCH, SE	1,3	RW, RP
Eremophila alpestris actia	California horned lark	CSC	1,2,3,4	GL, CS
Falco columbarius (migrant)	Merlin	CSC	1,2,3,4	gen. Flyover
Falco mexicanus	prairie falcon (nest)	CSC	1,2,3,4	DR, DW, CH
Falco peregrinus anatum	American peregrine falcon	(FE delisted 8/25/99) SE, SFP	1,2,3,4	CO, PL, ET
Icteria virens	yellow-breasted chat (nest)	CSC	1,2,3,4	RP, RW
Ixobrychus exilis hesperis (migrant)	western least bittern	CSC	1,2,3,4	RP, ET, FM, SM
Lanius ludovicianus	Loggerhead shrike	CSC	1,2,3,4	CS, CH, CP, DW

^{*} Refer to Exhibit C-1

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Birds (cont'd.)				
Laterallus jamaicensis coturniculus	California black rail	ST, SFP	4	FM, CM
Numenius americanus	long-billed curlew (nest)	CSC	4	CO, WA
Pandion haliaetus (migrant)	osprey (nest)	CSC	1,2,3,4	CO, WA, RV
Passerculus sanwichensis beldingi	Belding's savannah sparrow	SE	4	CM
Pelecanus occidentalis californicus	California brown pelican	SE, FE, SFP	4	СО
Phalacrocorax auritus	double-crested cormorant (rookery)	CSC	1,2,3,4	CO, WA, RV
Piranga rubra (migrant)	summer tanager	CSC	1,4	RW
Polioptila c. californica	California gnatcatcher	FT, FCH, CSC	1,4	CS, CH
Rallus longirostris levipes	light-footed clapper rail	SE, FE, SFP	4	СМ
Riparia riparia (migrant)	bank swallow	ST	1,2,3	CO, RP, RV
Sterna antillarum browni	California least tern	SE, FE, SFP	4	CD, ET, PL
Vermivora virginiae (migrant)	Virginia's warbler	CSC	3	CH, OW, RW
Vireo bellii pusillus	least Bell's vireo	SE, FE, FCH	1,2,3	RP, RW
Mammals				
Antrozous pallidus pacificus	pallid bat	CSC	1,2,3,4	CS,CH,GL
Eumetopias jubatus	northern sea lion	FT	4	CO
Eumops perotis californicus	California mastiff bat	CSC	1,2,3,4	general
Lepus californicus bennettii	San Diego blacktailed jackrabbit	CSC	1,2,3,4	CS,CP,CH, DW
Macrotus californicus	California leaf-nosed bat	CSC	1	general
Microtis californicus stephensii	Stephen's California vole	CSC	4	FM,GL
Neotoma lepida intermedia	San Diego desert woodrat	CSC	1,2,3,4	CS,CH,DW
Onychomys torridus ramona	southern grasshopper mouse	CSC	1,3	CL,CS,CH, DW
Perognathus longimembris brevinasus	Los Angeles pocket mouse	CSC	1,4	CS,CH,DW
Perognathus longimembris pacificus	Pacific pocket mouse	CSC, FE	4	CS
Plecotus townsendii pallescens	pale big-eared bat	CSC	1,2,3,4	DW,CH,OW
Sorex ornatus salicornicus	southern Calif. saltmarsh shrew	CSC	4	CM

^{*} Refer to Exhibit C-1

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE*	HABITAT
Plants				
Abronia maritima	red sand-verbena	4	4	CD
Acanthomintha obovata cordata	heart-leaved thorn-mint	4	unknown	CH,OW,PJ, GL
Androsace elongata acuta	California androsace	4	unknown	CH,OW,CS
Aster greatae	Greata's aster	1B	unknown	СН
Astragalus brauntonii	Braunton's milk vetch	FE, 1B	2,3	MF,CH,CS, GL
Astragalus pycnostachyus v. lanosissimus	Ventura marsh milk-vetch	SE, FPE, 1B	3,4	CM
Astragalus tener v. titi	coastal dunes milk-vetch	SE, FE, 1B	4	CB,CD
Atriplex pacifica	south coast saltscale	1B	4	CB,CS,PL
Atriplex parishii	Parish's brittlescale	1B	1	CS,VP,PL
Atriplex serenana v. davidsonii	Davidson's saltscale	1B	unknown	CBS,CS
Baccharis malibuensis	Malibu baccharis	1B	3	CS,CH,OW
Baccharis p. plummerae	Plummer's baccharis	4	3	MF,CH,OW,CS
Berberis nevinii	Nevin's barberry	SE, FE, 1B	1,2,3	CH,AF,CS
Calandrinia breweri	Brewer's calandrinia	4	unknown	CH,CS
Calandrinia maritima	seaside calandrinia	4	4	CBS,GL
Calochortus catalinae	Catalina mariposa lily	4	1,2,3	CH,OW,CS, GL
Calochortus c. v. clavatus	club-haired mariposa lily	4	1,3	CH,OW,GL
Calochortus plummerae	Plummer's mariposa lily	1B	3	CH,OW,CS, GL,MF
Calystegia peirsonii	Peirson's morning-glory	4	1	CH,CS,OW, CS,MF
Calystegia sepium binghamiae	Santa Barbara morning-glory	1A	4	CM
Camissonia lewisii	Lewis's evening-primrose	3	unknown	CB,OW,CD, CS,GL
Castilleja plagiotoma	Mojave Indian paintbrush	4	1	PJ,GB
Centromadia parryi ssp. australis (Hemizonia minthornii)	Santa Susana tarplant	SR, 1B	1,2,3	CH, CS
Cercocarpus betuloides v. blancheae	island mountain-mahogany	4	3	СН
Chorizanthe parryi v. fernandina	San Fernando Valley spineflower	SCE, FC, 1B	1,3	CS
Chorizanthe p. v. parryi	Parry's spineflower	3	3	CS,AF,CH, OW
Chorizanthe spinosa	Mojave spineflower	4	1	CS,DW
Convolvulus simulans	small-flowered morning-glory	4	unknown	CS,GL
Cordylanthus m. maritimus	salt marsh bird's-beak	SE, FE, 1B	4	CM
Crossosoma californicum	Catalina crossosoma	1B	4	CS

Refer to Exhibit C-1

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Plants (Con't)				
Deinandra minthornii (Hemizonia parryi australis)	southern tarplant	1B	Unknown	ET, GL, VP
Dichondra occidentalis	western dichondra	4	4	CH,OW,CS, GL
Dithyrea maritima	beach spectaclepod	ST, 1B	4	CD,CS
Dodecahema leptoceras	slender-horned spineflower	SE, FE,1B	1	AF,CH
Dudleya b. blochmaniae	Blochman's dudleya	1B	3	CS,CB,CH, GL
Dudleya cymosa marcescens	marcescent dudleya	SR, FT, 1B	3	СН
Dudleya cymosa ovatifolia	Santa Monica Mtns. dudleya	FT, 1B	3,4	CH,CS
Dudleya multicaulis	many-stemmed dudleya	1B	2	CH,CS,GL
Dudleya virens	bright green dudleya	1B	4	CH,CS
Erysimum insulare suffrutescens	suffrutescent wallflower	4	unknown	CB,CD,CS
Fremontodendron mexicanum	Mexican flannelbush	SR, FE, 1B	1,2,3	MF,CH,OW
Galium angustifolium gabrielense	San Antonio Canyon bedstraw	4	1	MF
Galium cliftonsmithii	Santa Barbara bedstraw	4	2,4	OW
Galium johnstonii	Johnston's bedstraw	4	unknown	MF
Goodmania luteola	golden goodmania	4	Unknown	DW,PL,GL
Helianthus nuttallii parishii	Los Angeles sunflower	1A	3	CM,FM
Heuchera abramsii	Abram's alumroot	4	Unknown	MF
Heuchera elegans	urn-flowered alumroot	4	Unknown	MF
Hulsea vestita gabrielensis	San Gabriel Mtns. sunflower	4	1	MF
Juglans c. v. californica	So.Cal. black walnut	4	1,2,3	CH,OW,AF
Juncus acutus leopoldii	southwestern spiny rush	4	4	CD,CM
Juncus duranii	Duran's rush	4	Unknown	MF
Lasthenia glabrata coulteri	Coulter's goldfields	1B	Unknown	CM,PL,VP
Lepechinia fragrans	fragrant pitcher sage	4	3	СН
Lilium humboldtii ocellatum	ocellated Humboldt lily	4	1,2,3	CH,OW,CO
Linanthus orcuttii	Orcutt's linanthus	1B	Unknown	CH,MF
Lupinus elatus	silky lupine	4	Unknown	MF
Lupinus excubitus v. johnstonii	interior bush lupine	4	Unknown	MF
Lupinus peirsonii	Peirson's lupine	1B	Unknown	CH,CS,RW
Malacothamnus davidsonii	Davidson's bush mallow	1B	1,3	CS,RW
Microseris douglasii v. platycarpha	small-flowered microseris	4	Unknown	OW,CS,GL
Monardella cinerea	gray monardella	4	Unknown	MF

Refer to Exhibit C-1

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Plants (Con't)				
Monardella viridis saxicola	rock monardella	4	Unknown	CH,MF
Mucronea californica	California spineflower	4	Unknown	CH,CD,CS, GL
Muilla coronata	crowned muilla	4	Unknown	DW
Nama stenocarpum	mud nama	2	Unknown	FM
Nemacaulis d. v. denudata	coast woolly-heads	2	4	CD
Nemacladus gracilis	slender nemacladus	4	Unknown	OW,GL
Orcuttia californica	California Orcutt grass	SE, FE,1B	1,4	VP
Oreonana vestita	woolly mountain-parsley	1B	Unknown	MF
Oxytheca caryophylloides	chickweed oxytheca	4	Unknown	MF
Pentachaeta lyonii	Lyon's pentachaeta	SE, FE, 1B	3,4	CH,GL
Perideridia g. gairdneri	Gairdner's yampah	4	Unknown	CH,GL,VP,MF
Perideridia pringlei	adobe yampah	4	Unknown	CH,OW,CS
Phacelia exilis	Transverse Range phacelia	4	Unknown	MF
Phacelia mohavensis	Mojave phacelia	4	Unknown	OW,MF
Phacelia stellaris	Brand's phacelia	1B	Unknown	CD,CS
Polygala cornuta v. fishiae	Fish's milkwort	4	4	CH,OW,RW
Quercus engelmannii	Engelmann oak	4	Unknown	CH,OW,RW,GL
Ribes divaricatum v. parishii	Parish's gooseberry	1B	2	RW
Romneya coulteri	Coulter's matilija poppy	4	Unknown	CH,CS
Scutellaria bolanderi austromontana	southern skullcap	1B	Unknown	CH,OW,MF
Selaginella asprella	bluish spike-moss	4	Unknown	MF
Senecio ionophyllus	Tehachapi ragwort	4	Unknown	MF
Suaeda esteroa	estuary seablite	1B	4	CM
Suaeda taxifolia	woolly seablite	4	4	CB,CM
Swertia neglecta	pine green-gentian	4	Unknown	MF
Syntrichopappus lemmonii	Lemmon's syntrichopappus	4	Unknown	СН
Thermopsis californica v. argentata	silvery false lupine	4	Unknown	MF

Refer to Exhibit C-1

NDDB Highest Inventory Priority Plant Communities of Los Angeles City				
Community	Mapping Zone of Occurrence (NDDB data)			
Walnut Forest	3			
California Walnut Woodland	1,2			
Valley Oak Woodland	1,2			
Southern Willow Scrub	1			
Southern Sycamore Alder Riparian Woodland	1,2,3			
Southern Mixed Riparian Forest	1			
Southern Cottonwood Willow Riparian Forest	1,3			
Southern Coast Live Oak Riparian Forest	1,2,3			
Riversidian Alluvial Fan Sage Scrub	1			
Valley Needlegrass Grassland	2			
Southern Dune Scrub	1			
Southern Coastal Bluff Scrub	4			
Coastal Salt Marsh	3			

Source: Frank Hovore & Associates, December 1995; Environmental Affairs Department, 2001.

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D. CULTURAL RESOURCES

City of Los Angeles L.A. CEQA Thresholds Guide

D.1. PALEONTOLOGICAL RESOURCES

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

Paleontological resources are the fossilized remains of organisms that have lived in the region in the geologic past and the accompanying geologic strata. Because the majority of species that have existed on Earth are extinct, the fossil record represents the primary source of data on ancient life forms. In addition, the fossil record is finite, and many scientists feel that no single species is sufficiently understood or represented in research as to preclude further need for specimens. Paleontological resources are considered non-renewable and important.

Paleontological resources occur throughout the City of Los Angeles. They are not evenly distributed; the potential for fossil occurrence depends on the rock type exposed at the surface in a given area. Rocks are classified into three principal types: igneous, metamorphic and sedimentary. Sedimentary rocks contain the bulk of fossils in the City, although metamorphic rocks may also contain fossils. Igneous rocks do not contain fossils. In addition to igneous and most metamorphic rocks, areas of artificial landfill, streambeds and beach sand do not contain fossils.

The older sedimentary rocks are exposed in the hills and mountains, while younger rock units are present in low-lying and flat valley and basin floors. The majority of igneous rocks in the region are found in the Santa Monica Mountains and the northern San Fernando Valley. Within the City of Los Angeles, metamorphic rocks are found mostly in the Santa Monica Mountains and within scattered exposures around the region.

Direct destruction of fossils within fossil-bearing rock units may result from grading or excavation associated with a project, particularly during the construction phase. Indirect destruction or loss of fossils exposed at the surface may result from increased erosion, human access, or other activity in a project area. Increased access could result from the opening of private or otherwise closed lands, new access routes through sensitive areas, or through excavation or the removal of

vegetation.

Paleontological resources are protected by state and federal legislation. State regulations mandate protection of paleontological resources on public lands and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain state regulations for historical resources. City guidelines for the protection of paleontological resources are specified in Section VIII of the Conservation Element, and for public works projects, Standard Specifications for Public Works Construction, Section 6-3.2. Information on rock types can be found in 3. Data, Resources, and References.

C. Screening Criteria

• Could implementation of the project result in the disturbance of surface or subsurface fossils, either through site preparation, construction or operational activities, or through an increase in human activities at or near the fossil site?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Paleontological Resources and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Paleontological Resources from the proposed project.

D. Evaluation of Screening Criteria

Assess the potential for discovery of paleontological resources. The following sources are available: existing paleontological surveys for the project site; Los Angeles County Natural History Museum; Environmental and Public Facilities Maps - Vertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles and Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles; Exhibit D.1-1; or other appropriate resources.

Evaluate the degree of disturbance to the project site. Consider whether the site has been vacant or covered by surfaces that required little or no excavation or grading, such that there has been little surface or subsurface disturbance. Sites from which native topsoil has been removed, such as

The California Office of Historic Preservation (OHP) has jurisdiction over projects that may impact historic resources. For regulation of historic resources, see Exhibits D.3-1 to D.3-3.

landfills, are unlikely to retain paleontological resource potential.

Review the description of the project and the construction/operation activities. Assess the amount of grading, excavation, erosion, and increased human activity (e.g., opening of previously closed lands, new access routes through sensitive areas, or removal of vegetation that could disturb surface and subsurface fossils). Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the physical setting, paleontology, and geology of the project site and surrounding area;
- Summary of surveys and research for the project site; and
- Summary of requirements and/or policies for paleontological resources that apply to the project. (See 3. Data, Resources, and References.)

Project Impacts

Using the information from the Evaluation of Screening Criteria, Environmental Setting, and project description, estimate the extent and importance of paleontological resources likely to be contained on the site and the consequences that would likely result from the project. Consider

compliance with guidelines and regulations such as the California Public Resources Code, Federal Antiquities Act, Conservation Element, and, for public works projects, Standard Specifications for Public Works Construction. Regional or statewide significance may be based on the quality and integrity of the resource, remaining supply, feasibility of recovery, or scientific or public importance. Assistance from the Los Angeles County Museum of Natural History or a professional consultant may be required.

Determine whether excavation, grading, or operational activities would impact to the depth of the subsurface rock units containing the fossils. Evaluate the potential destruction of fossils exposed on the surface by considering the increased human activity generated by the project, including potential for soil erosion, construction traffic in sensitive areas, and increased human access to sensitive areas after project completion. If the area has been disturbed through previous grading or excavation or installation of subsurface utilities, it is likely that fossils would have been discovered at that time, have been destroyed, or are no longer in their original location (e.g., they have been brought in from other areas with fill).

Cumulative Impacts

Review the list of related projects and estimate the extent of paleontological resources likely to be contained on the sites and the consequences that would likely result from these related projects. Determine the cumulative impact to fossils of regional or statewide significance from the related projects combined with the proposed project. In particular, consider cumulative impacts to fossils from the same time period. Evaluate the destruction of fossils by considering the cumulative increase in human activity, excavation, grading, or operational activities.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Revise the proposed project to avoid excavation or grading in areas with known or potential surface exposures of fossils, or within rock units with a high potential for paleontological resources;
- Provide erosion protection (e.g., retaining walls, drainage channels) to protect surface resources;
- Restrict or prevent access to sensitive resource areas on site;

- Retain a qualified paleontologist to monitor, and, if necessary, salvage scientifically significant fossil remains. Ensure scientific specimens become the property of a public, nonprofit educational institution, such as the Los Angeles County Museum of Natural History or similar institution;
- Protect subsurface fossils in place, through covering with appropriate soil materials; and
- Divert grading efforts in the area of an exposed fossil to allow evaluation and, if necessary, salvage of exposed fossils.

3. DATA, RESOURCES, AND REFERENCES

Los Angeles County Museum of Natural History, Department of Vertebrate Paleontology: 900 Exposition Boulevard, Los Angeles, California 90007; Telephone: (213) 763-3489, Lawrence G. Barnes Ph.D.; 213-763-3329. The Museum of Natural History does not maintain records of paleontological surveys or studies, but does perform record checks to determine if fossil resources are present within or near a project area, provides technical assistance, and acts as a repository for salvage fossils.

California Office of Historic Preservation: P.O. Box 942896, Sacramento, California 94296-0001; Telephone: (916) 653-6624. OHP has legal jurisdiction over projects, which may impact historic resources, which include certain paleontological resources. OHP can provide guidance as to the evaluation of significance of historic resources.

Conservation Element provides guidelines for the preservation of paleontological resources.

City Planning Department, Environmental and Public Facilities Maps (1997):

- Vertebrate Paleontological Resources Sensitivity Areas in the City of Los Angeles
- Invertebrate Paleontological Resources Sensitivity Areas in the City of Los Angeles

These maps were based on information prepared by the County of Los Angeles Natural History Museum in 1993 and delineate areas of similar paleontological sensitivity within the City. These sensitivity zones may contain several different rock units that share a common history of production of paleontological resources.

California Division of Mines and Geology (CDMG), 655 S. Hope St. Rm 700, Los Angeles, California 90017-2321; Telephone: (213) 239-0878. The following documents are available

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from CDMG:

- CDMG Geologic Atlas Sheets of California Los Angeles: These maps show the geologic formations underlying the City of Los Angeles in a single map, at a scale of 1:250,000.
- Dibblee Geological Foundation Maps applicable United States Geological Survey (USGS) topographic quadrangle: Dibblee maps show geologic information in greater detail than Geologic Atlas Sheets, at a scale of 1:24,000, corresponding to 7½ minute USGS topographic quadrangles.

The Society of Vertebrate Paleontology, an international association of professional paleontologists, has developed guidelines for protection and preservation of paleontological resources, as well as mitigation standards for impacts to paleontological resources, in response to CEQA.

Rock Types

Sedimentary rocks are usually layered or bedded and formed from cemented accumulations of sand, silt or mud. The sedimentary rocks in the City range in age from the Cretaceous (100 million years before present) to the Recent periods. Intrusive igneous rocks, formed at depth from molten magma and intruded into other rock bodies, tend to be homogeneous masses, such as granite, and do not contain fossils. Extrusive igneous rocks, such as volcanic rocks, very rarely contain plants or animal fossils. Metamorphic rocks, products of modifications to igneous or sedimentary rocks by heat, pressure or fluids, may or may not contain fossils, depending on the degree of alteration and the original rock type.

Selected Legislation

Federal

Federal Antiquities Act of 1906 (P. L. 59-202; 32 Stat. 225)

This act forbids, and establishes criminal sanctions for, the disturbance of any object of antiquity on federal land without obtaining a permit from an authorizing authority.

Federal Land Management and Policy Act of 1976 (FLMPA) (P.L. 94-579, 43 U.S.C. 1701-1782)

FLMPA provides authority for the Bureau of Land Management (BLM) to regulate lands under its jurisdiction, to be managed in a manner to "protect the quality of scientific, scenic, historic,

ecological, environmental...and archaeological values." Authority is given to establish Areas of Critical Concern (ACEC).

National Environmental Policy Act (NEPA) of 1969 (P. L. 91-190; 83 Stat. 852, 42 U.S.C. 4321-3427)

With regard to paleontological resources, NEPA mandates the evaluation of impacts in order to "preserve important historic, cultural and natural aspects of our national heritage" (Section 101b.4).

State

Public Resources Code, Section 5097.5 (Stats. 1965, c. 1136, p. 2792)

This section prohibits "the excavation or removal of any vertebrate paleontological site...or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands."

CEQA (13 PRC, 21000 et seq)

According to CEQA, "historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (Div. 1, PRC 5020.1) (italics added). This has been subsequently interpreted as requiring identification of potential adverse impacts of a project to any object or site of scientific importance.

Guidelines for the Implementation of CEQA, as amended May 10, 1980 (14 Ca. Admin. Code: 15000 et seq)

The CEQA Guidelines authorize the Lead Agency to require mitigation to reduce and avoid significant effects on the environment. CEQA, Appendix G, subsection J, states, "A project will normally have a significant effect on the environment if it will disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study."

California Administrative Code, Title 14, Section 4307

States, "no person shall remove, injure, disfigure, deface, or destroy any object of paleontological, archaeological, or historical interest or value."

Local

Standard Specifications for Public Works Construction, Section 6-3.2

Requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures.

Exhibit D.1-1 PALEONTOLOGICAL POTENTIAL BY ROCK UNIT/GEOLOGIC FORMATION

Formation/Rock Unit	Paleontological Potential	Fossils Present
Palos Verdes Sand	High	Vertebrates and Invertebrates
San Pedro Sand	High	Vertebrates and Invertebrates
Lomita Marl	High	Vertebrates
Timms Point Silt	High	Vertebrates and Invertebrates
Fernando Formation or Reppeto Formation	High	Vertebrates and Invertebrates
Pico Formation	High	Vertebrates and Invertebrates
Monterey Formation	High	Vertebrates
Altamira Shale	High	Vertebrates
Model Formation	High	Vertebrates
Topanga Formation	High	Vertebrates and Invertebrates
Santa Suzana Formation ^a	High	Invertebrates
Chico Formation and/or Tuna Canyon Formation	High	Vertebrates and Invertebrates
Quaternary Alluvium	Low to High b	Vertebrates
Las Virgenes Sandstone ^a	Low	Invertebrates
Simi Conglomerate ^a	Low	none reported
Trabucco Formation	Low	none reported
Santa Monica Slate	Low	Invertebrates

^a These rock units are grouped together as the Martinez Formation in the older literature on the region.

NOTE: "Low," High" and "Undetermined" potential are scientifically recognized terms identifying the chance of fossil discovery during excavation into a given geologic unit. It is not uncommon for low potential deposits to overlay or otherwise cover more rock units with a high potential for discovery. Information on rock units on a particular site may be obtained from existing geotechnical studies prepared for the project site or from maps, such as the CDMG Geologic Atlas Sheets of California or the Dibblee Geological Foundation Maps.

Source: RMW Paleo Associates, 1995, based on literature, published and unpublished records of discovery of fossils in each geologic unit, the relative abundance of fossils at past discovery sites and the depositional environment associated with individual geologic units.

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Potential for discovery of resources in Quaternary deposits increases with increased depth of excavations.

D.2. ARCHAEOLOGICAL RESOURCES

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- V.b): Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?
- V.d): Would the project disturb any human remains, including those interred outside of formal cemeteries?

B. Introduction

Archaeology involves the physical, structural, and documentary evidence of past human endeavors. Such cultural resources may or may not be visible on the surface, and may be of either prehistoric or historic origin. Because of its climate, topography, and natural resources, the greater Los Angeles area is known to have supported prehistoric and historic cultures. The location of known archaeological sites is confidential to prevent scavenging of artifacts. Artifacts are considered finite and non-renewable resources

Construction or operation activities, which affect the surface or subsurface of the ground at or near archaeological resources, can disturb or destroy them. Artifacts may be lost or destroyed through grading, crushing, scattering, or removal from the ground. In addition, scattering or otherwise taking the artifacts out of their original placement may result in the loss of important information about the relationship of artifacts to each other. With archaeological resources, the relationship of materials to each other in the ground is more informative than the same artifacts removed to a laboratory for study. Impacts may also occur through the alteration or destruction of a physical landscape with special values to Native Americans. The Native American Graves and Repatriation Act of 1990 protect Native American remains (see 3. Data, Resources, and References).

The California state inventory of known, documented archaeological resources for the Los Angeles area is maintained at the South Central Coastal (Regional) Information Center, at the Institute of Archaeology of the University of California at Los Angeles (UCLA) (known as the Information Center). All resources on this inventory should be evaluated for potential impacts in CEQA documentation. In addition, federal standards for eligibility to the National Register of

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Historic Places¹ (National Register) may be used to determine whether known or potential resources should be examined under CEQA. Archaeological resources may be present on the grounds of historic sites or districts.

C. Screening Criteria

• Would the proposed project occur in an area with archaeological resources, human remains having archaeological associations, an archaeological study area, or a Native American sacred place, and involve grading, excavation, accelerated erosion, or other activities or changes to the site that could affect archaeological resources?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Archaeological Resources, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Archaeological Resources from the proposed project.

D. Evaluation of Screening Criteria

The following sources may provide assistance in identifying the presence or potential presence of archaeological resources: existing archaeological surveys and documented historical accounts; the Information Center at the UCLA Institute of Archaeology; the Native American Heritage Commission; California Department of Transportation (Caltrans); the Army Corps of Engineers (ACOE); State Park Service; National Register; local, county, and state landmarks lists; Sanborn Fire Insurance maps; the Environmental and Public Facilities Map, Prehistoric and Historic Archaeological Sites and Survey Areas; and other appropriate resources.

Where sufficient information or research is not available to determine the presence or absence of archaeological resources, consider the following:

• Presence of elements or features that are historically or culturally important to a significant earlier community.

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For federal eligibility criteria regarding listing of archaeological resources in the National Register, see Exhibit D.3-1 in D.3. HISTORICAL RESOURCES.

- Features of the area that would create a favorable environment for prehistoric or historical use, such as:
 - A water source, travel corridor, native plants or animals, or sources of rock for construction, making tools, or artwork; or
 - Location in an area with unusual views, a defensive position or other values for ceremonial, ritual or astronomical observances.

Evaluate the degree of disturbance to the project site. Consider if the site has been vacant or covered by surfaces that required little or no excavation or grading, such that there has been little surface or subsurface disturbance (sites from which native topsoil has been removed, such as landfills, are unlikely to retain archaeological resource potential). Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100-years-old² and possesses substantial stratigraphic integrity; or

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Although the CEQA criteria state that "important archaeological resources" are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

Involves important research questions that historical research has shown can be answered only with archaeological methods.

В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the physical setting, archaeology, and geology of the project site and surrounding area;
- Summary of surveys and research for the project site; and
- Summary of requirements and/or policies for archaeological resources that apply to the project. (See 3. Data, Resources, and References).

Project Impacts

If the project site is located in an area with known or potential presence of an archaeological resource, archaeological study area, or human remains having archaeological associations, reviews the description of the project and construction/operation activities. Assess the amount of grading, excavation, erosion and increased human activity (e.g., opening of previously closed lands, new access routes through sensitive areas, or through removal of vegetation) that would occur with project implementation.

Estimate the importance of archaeological resources likely to be contained on the site and the consequences that would likely result from the project. The significance of a site is measured by eligibility of the resource to the California Register of Historical Resources (California Register) or the National Register. Criteria for listing in the National Register include association with events, persons, history or prehistory or embodiment of distinctive characteristics. These criteria are based on context (theme, place, and time), integrity (location, design, setting, materials, workmanship, feeling), and association. The California Register uses the National Register criteria for listing resources significant at the national, state, or local level.

Consider compliance with guidelines and regulations such as the California Public Resources Code, Federal Antiquities Act (and subsequent federal legislation), Conservation

Element, and, for public projects, Standard Specifications for Public Works Construction. Assistance from the Information Center or a professional consultant may be required.

Most existing archaeological site records, information about what areas have already been surveyed, information concerning sites that have been tested or evaluated, and a library of excavation reports, are maintained as part of the State Inventory at the Information Center. The most immediate and complete source of updated site information is a "Quick Check" conducted by the Information Center. Under new directives, the Information Center is beginning to gather information about designated landmarks, historical sites, and historical maps, but this archive is not yet complete. The Information Center maintains a list of qualified archaeological consultants which is made available on request.

Determine whether construction or operational activities would disturb, damage, or degrade an important resource or its setting. Consider excavation and grading that directly impacts a resource; construction of permanent buildings that result in loss of access to buried resources; added human activity that may lead to scavenging or uncovering of resources; and increases in soil erosion. If the area has been disturbed through previous grading or excavation or installation of subsurface utilities, it is likely that resources would have been discovered at that time or have been destroyed.

Cumulative Impacts

Review the list of related projects and identify those in areas with known or the potential presence of archaeological resources. In the same manner as for project impacts, estimate the extent and importance of archaeological resources likely to be contained on the sites and the consequences that would likely result from these related projects. Determine the cumulative impact from the related projects combined with the proposed project. In particular, consider cumulative impacts to the population of resources which would remain and impacts to groupings (e.g., same camp, village, or settlement). Evaluate the destruction of resources exposed on the surface by considering the cumulative increase in human activity and soil erosion.

Sample Mitigation Measures

Potential mitigation measures include the following:

Cover archaeological sites with a layer of fill before building surface facilities such as tennis courts, parking lots, or gardens above them, when the following

conditions can be met:

- The underlying site will not be seriously compacted;
- The fill will not be chemically active;
- The site is protected against natural deterioration; and
- The site has been recorded and tested, and full parameters are known, i.e., horizontal extent, depth, age, cultural complexity, etc;
- Deed archaeological sites into permanent conservation easements;
- Undertake data recovery. Data recovery requires the preparation of an excavation plan³ which sets forth the size of the sample to be acquired, the methods and techniques of excavation, methods and techniques of laboratory studies to be conducted, documentation procedures, and the place where all materials and documentation will be curated; and
- Conduct resource recovery. Some features or objects (rock rings, rock art, structural elements, architectural elements, etc.) can be documented in place, and then either relocated for public interpretation on the subject property, or removed to a museum or other institution for safekeeping and display.

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Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Preservation Planning Bulletin No. 4 (a).

3. DATA, RESOURCES, AND REFERENCES

Information Center: UCLA Institute of Archaeology, Fowler Museum of Cultural History, Los Angeles, California 90095; Telephone: (310) 825-4361.

California Office of Historic Preservation (OHP), P.O. Box 942896, Sacramento, California 94296-0001; Telephone: (916) 653-6624. Maintains many publications, including Instructions for Recording Historical Resources, 1995, and California Register: Proposed Guidelines for the Nomination of Properties, 1995.

The Cultural Heritage Commission (CHC), Los Angeles Conservancy, Natural History Museum of Los Angeles County, and the Community Redevelopment Agency (CRA) of the City of Los Angeles, have limited inventories of historical landmarks, but their data do not include archaeological sites and should be augmented by consultation with the Information Center.

CEQA, Appendix K, Archaeological Resources, contains standards for review and mitigation.

Archaeological Resource Management Report (ARMR): Recommended Contents and Format, OHP, 1989. Contains a useful checklist and guidelines for reviewing the adequacy of the preparation and organization of archaeological reports.

CEQA and Archaeological Resources, 1994. Governor's Office of Planning and Research (OPR).

Conservation Plan Element: Section II-3, Preservation of Archaeological Sites and Paleontological Findings, 2001.

City of Los Angeles -- Archaeological Resources Information:

In a comprehensive review of the City's archaeological resources completed in August 1993, the Information Center, which assigns site numbers and curates site records, estimated that only two percent of the City's approximately 800 square miles has been surveyed for archaeological resources. At that time, however, 196 prehistoric sites, 50 historical sites, and 10 undefined isolated occurrences had already been recorded. Of these, at least 26 sites were known to contain human burials, and 10 sites had both prehistoric and historic components. The prehistoric sites include named Native American villages, buried deposits and features, pit houses, occupied caves and rockshelters, bedrock mortars, camp sites, cemeteries and rock art. Historical sites were distinctly underrepresented in the records, since standing historic structures have not been regularly assigned archaeological site numbers or assessed for the potential existence of associated buried features until

recent state guidelines advised that this should be done. The historical sites already recorded are as varied as pre-1830s limekilns, stage stops, mission structures and dams, a log cabin, many adobes, quarries, oil exploration and development features, a submerged ship, a Civil War asphalt mine, aspects of the Pueblo and early water canal features, Chinatown, and a Japanese labor camp.

Selected Legislation

Federal

Federal Antiquities Act of 1906 (P. L. 59-209; 16 U.S.C. 431-433)

Basis for all following legislation. The government, acting for the people, should protect archaeological and historical sites and "any object of antiquity," and preserve them for public availability. Forbids disturbance of said objects of antiquity on federal lands without a permit issued by the responsible agency. Establishes criminal sanctions for unauthorized use or destruction of antiquities.

Historic Sites Act of 1935 (P. L. 74-292, 16 U.S.C. 461-467, 49 Stat. 666)

Declares, "it to be national policy to preserve for public use historic sites, properties, buildings, and objects of national significance." Gives the National Park Service (NPS) (through the Secretary of the Interior) broad powers to execute this policy, including criminal sanctions, on both federal and non-federal lands. It also sets up an advisory board to aid the Secretary of the Interior in implementing this Act.

Reservoir Salvage Act of 1960 (P. L. 86-523; 74 Stat. 220)

Requires Secretary of the Interior to institute an archaeological salvage program in connection with federally funded reservoir programs requiring the responsible agencies to comply with this program.

Historic Preservation Act of 1966 (P. L. 89-665; 80 Stat. 915)

Expansion of the National Register to include sites of not only national, but local significance; authorizes program of matching funds for their acquisition and preservation; and establishes the Advisory Council on Historic Preservation to help implement and monitor this Act.

National Environmental Policy Act (NEPA) of 1969 (P. L. 91-190; 83 Stat. 852)

Requires that cultural resources be considered in assessing the environmental impact of proposed federal projects.

Executive Order 11593 of May 13, 1971: "Protection and Enhancement of the Cultural Environment" Richard M. Nixon (36 F.R. 8921)

States that the federal government shall provide leadership in preserving, restoring and maintaining the historic and cultural environment; specifies that all federal agencies shall institute inventories for historic and archaeological sites, and shall provide for their protection as specified by P. L. 89-665.

Archaeological and Historical Preservation Act of 1974 (P. L. 93-291, U.S.C. 469-469c; 88 Stat. 174)

Amends the Reservoir Salvage Act of 1960 to include all federal programs which may impact cultural resources; authorizes expenditure of program funds for salvage projects; and requires Secretary of the Interior to report annually to Congress on the effectiveness of the program.

Federal Land Policy and Management Act of 1976 (P. L. 94-579; 90 Stat. 2743)

Directs the Bureau of Land Management (BLM) to manage lands on the basis of multiple use in a manner that will protect the quality of scientific, historical, and archaeological values. It provides the guidelines for the acquisition and management of these resources.

American Indian Religious Freedom Act of 1978 (P. L. 95-341; 92 Stat. 469)

States that it is the policy of the United States to protect and preserve for Native Americans their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian including access to sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites.

Native American Heritage Bill - Chapters 1492 (1984) and 370 (1992)

Policy to protect Native American remains and maintain integrity of their archaeological database; and to establish guidelines for recordation of reburial of human remains and grave goods.

Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) - (P. L. 101-601; 104 Stat. 3048, 25 U.S.C. 3001)

Conveys to Native Americans, of demonstrated lineal descendence, human remains and funerary or religious items that are held by federal agencies and federally-supported museums, or that have been recovered from federal lands. Also makes the sale or purchase of Native American human remains, "whether or not they derive from federal or Indian lands, illegal."

State

California Public Resources Code

Section 5097.5 (Stats. 1965, C. 11362792)

Defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands. Prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands, and provides for criminal sanctions. Amended in 1987 to require consultation with the California Native American Heritage Commission whenever Native American graves are found. Violations for taking or possessing remains or artifacts are felonies.

Chapter 1332, Section 5097.9

Establishes the California Native American Heritage Commission to make recommendations to encourage private property owners to protect and preserve sacred places in a natural state and to allow appropriate access to Native Americans for ceremonial or spiritual activities. The Commission is authorized to assist Native Americans in obtaining appropriate access to sacred places on public lands, and to aid state agencies in any negotiations with federal agencies for the protection of Native American sacred places on federally administered lands in California.

Section 5097.98-99 (Stats. 1982, C. 1492. Amended 1987)

Requires that the Governor's California Native American Heritage Commission be consulted whenever Native American graves are found. Makes it illegal to take or possess remains or artifacts taken from Native American graves. Does not apply to materials taken before 1984. Violations occurring after January 1, 1988, become felonies.

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CEQA (P. R. C. Section 21001)

Requires that cultural resources be considered in assessing the environmental impact of proposed projects.

California Register (1993, AB 2881, Chapter 1075)

Amends the Public Resources Code as it affects historical resources. Purpose is to develop and maintain, "an authoritative guide to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change." Sites, places, or objects which are eligible to the National Register (50-years-old or more) are automatically included in the California Register.

California Penal Code, Title 14, Part 1, Section 622.5

Provides that any person, not the owner thereof, who willingly destroys or injures objects of archaeological or historical value, whether on public or private land, is guilty of a misdemeanor.

California Administrative Code, Title 14, Section 4307

States, "no person shall remove, injure, disfigure, deface or destroy any object of paleontological, archaeological, or historical interest or value."

Local

Standard Specifications for Public Works Construction, Section 6-3.2

Requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures.

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D.3. HISTORICAL RESOURCES

1. INITIAL STUDY SCREENING PROCESS

Initial Study Checklist Question

V.a): Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

B. Introduction

Historical resources are found throughout the City of Los Angeles and are reminders of the City's historical and cultural development. Resources include, for example, buildings, structures, street lighting systems, spaces, sites, or components thereof. Uses include residential, non-residential (e.g., commercial, industrial, institutional), and public facilities. Resources may be important individually or as part of a district or grouping of complementary resources.

Significant historical resources include those designated or eligible for designation in the National Register of Historic Places (National Register); the California Register of Historical Resources (California Register) or other state program; as a City of Los Angeles Historic Cultural Monument; or in a City of Los Angeles Historic Preservation Overlay Zone (HPOZ). Historical resources may also include resources listed in the State Historic resources Inventory as significant at the local level or higher and those evaluated as potentially significant in a survey or other professional evaluation.

Agencies with jurisdiction over historical resources include the National Park Service (NPS), the California Office of Historic Preservation (OHP), and the City of Los Angeles (see Exhibits D.3-1 to D.3-4 for additional information). The NPS maintains the National Register. Criteria for listing in the National Register include association with events, persons, history, or prehistory or embodiment of distinctive characteristics. These criteria are based on context (theme, place, and time), integrity (location, design, setting, materials, workmanship, feeling, and association), and, if a recent resource, exceptional importance.

OHP implements state preservation law and is responsible for the California Register. The California Register uses the National Register criteria for listing resources significant at the national, state, or local level.

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Within the City of Los Angeles, the Cultural Heritage Commission (CHC) is responsible for designating resources as Historic-Cultural Monuments. Monuments, which must meet criteria similar to those for the National Register, are designated and protected. The City assigns an HPOZ to an area that meets certain criteria in order to preserve historical resources and ensure that new development is compatible with the area. Projects within an HPOZ are monitored by the City Planning Department in order to maintain the historic integrity of the area.

Projects that affect historical resources, such as by demolition, relocation, rehabilitation, conversion, alteration, or construction, may have a significant impact. The stock of significant historical resources cannot be replenished and is finite. Thus, the permanent loss of a resource is irreversible. While, in some circumstances, the resource's integrity can be maintained after rehabilitation, conversion, alteration, or construction, insensitive work also may result in a significant impact.

C. **Screening Criteria**

Are there historical resources on the project site or in the vicinity, which would be adversely impacted by the project through, for example, demolition, construction, conversion, rehabilitation, relocation, or alteration?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Historical Resources, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Historical Resources from the proposed project.

D. **Evaluation of Screening Criteria**

Evaluate the historical significance of the resource by considering the following questions. In general, a "ves" response to any of the questions indicates an historical resource may be involved.

- Has the site been coded by the Department of Building and Safety with a Zoning 1. Instruction (ZI) number in the 145 series (which indicates prior identification of the property as historic)?
- 2. Has the resource been designated by the City of Los Angeles as an Historic-Cultural

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Monument or as a contributor to an HPOZ?

- Is the resource included within the California Register maintained by the OHP and ranked 3. with an evaluation code of 1 (National Register listed resource) or 2 (determined eligible for listing in the National Register)?
- 4 Has the resource been classified as historic in an historical resources survey conducted as part of the updating of the Community Plan, the adoption of a redevelopment area or other planning project?
- 5 Is the resource subject to other federal, state, or local preservation guidelines or restrictions?
- 6. Does the resource have known associations with an architect, master builder or person or event important in history such that the resource may be of exceptional importance?
- Is the resource over 50-years-old and a substantially intact example of an architectural 7. style significant in Los Angeles? (Age is calculated from an original building permit or the Land Use Planning and Mapping System (LUPAMS) maintained by the City Planning Department. See Exhibit D.3-5 for significant architectural styles.)

Review the description of the proposed project and determine the type of activities proposed during site preparation, construction, and operation. Projects that affect historical resources, such as demolition, relocation, rehabilitation, conversion, alteration, or construction, may have a significant impact if the project results in a substantial adverse change which would impair historical significance. Insensitive rehabilitation, conversion, alteration or construction may also result in a significant impact. Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

Significance Threshold Α.

A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource.

A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;

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

В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Architectural description and condition of the resource(s);
- Listing, designation, or determination from city, state, or federal agency (e.g., listed or determined eligible for the National Register or California Register; designated as a City of Los Angeles Historic-Cultural Monument; included within an HPOZ as a contributor);
- Construction history (date of construction and major alterations, architect, builder and owner);
- Significance of owner, architect, builder, or architectural style in history; and
- Context of resource (population, district, grouping, etc.).

Project Impacts

Conduct an evaluation of the historical resource to determine its significance (based on listing or eligibility for listing). Field surveys and research, in addition to the review of the Initial Study screening process may be necessary to determine whether a resource is listed or eligible for listing. If a resource is not listed on the National Register, California Register, City of Los Angeles Historic-Cultural Monuments, or, if applicable, HPOZ, use the appropriate criteria for listing to determine whether it is eligible. Assistance is available from the agencies with jurisdiction over such resources and from the information included in 3. Data, Resources, and References. A professional consultant may be required.

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Review the description of the proposed project and consider the potential impacts. When the demolition of an historical resource is proposed, weigh the impact given the significance of the resource and the population of similar resources which would remain. If the resource to be demolished is part of a district or grouping, also assess the impact to the listing or eligibility of the district or grouping.

When a significant historical resource is relocated, the ability to retain listing or eligibility depends upon individual circumstances. For example, relocation of a resource whose most significant feature is setting or position on a parcel would be more detrimental than if the key element is the architectural style and structural features. The style and feature would relocate with the building; however, the setting would not. Also, consider changes in the context (e.g., removal from a district).

Evaluate conversion, rehabilitation, or alteration to a significant historical resource in terms of the extent of the work and the impact on the listing or eligibility of the resource. Also, determine whether the work meets the standards for rehabilitation established by the Secretary of the Interior and the OHP (see Exhibits D.3-1 and D.3-4). Consider whether the conversion, rehabilitation, or alteration work would be compatible with the massing, size, scale, and architectural features of the resource. Projects more sensitive to historic integrity include minor repairs or temporary work that does not permanently affect significant elements and character.

If new construction is proposed, give key consideration to compatibility with the massing, size, scale, and architectural features of the historical resource(s). Determine the impacts to the setting and character of the area as well as whether the new construction might indirectly reduce the viability of a district or grouping of historical resources.

Cumulative Impacts

Review the list of related projects and identify those that:

- Are located within the same National Register district, HPOZ, general area, neighborhood, or community; or
- Involve resources with the same historical context or use (e.g., by the same architect or in the same period).

Determine the impact of the related projects. Consider the cumulative impacts of the proposed and related projects to the population of resources which would remain, and to districts and groupings.

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Sample Mitigation Measures

Potential mitigation measures include the following:

- Prepare a preservation plan or element which provides guidelines to ensure that the project conforms to the standards for rehabilitation established by the Secretary of the Interior and the OHP;
- Require new construction to be compatible with historical resources on the site and in the vicinity (e.g., mass, height, materials, setback, retention of mature landscaping);
- Require the project sponsor to relocate the historical resource or offer it for relocation by another individual or organization (provided that eligibility will be maintained following the relocation);
- Require the project sponsor to adaptively reuse the historical resource or incorporate it into the project;
- Undertake documentation according to the requirements of the Historic American Building Survey (HABS) such as large format photography, measured drawings and written narrative. Make available copies of this documentation to the Los Angeles Public Library (LAPL) and local preservation organizations and historical societies; and
- Require the project sponsor to allow local preservation organizations and historical societies to document the resource and/or remove significant historic elements for archives.

3. DATA, RESOURCES, AND REFERENCES

- NPS, Pacific Great Basin Support Office, 1111 Jackson St., Suite 700, Oakland, CA. 94607, Telephone: (510) 817-1396. NPS maintains the National Register.
- OHP, P.O. Box 942896, Sacramento, California 94296-0001; Telephone: (916) 653-6624. OHP duties include: administration of National Register, California Register, State Historical Landmarks and State Points of Historical Interest programs, and State Historical resources Inventory; Section 106 process (National Historic Preservation Act); and Responsible Agency for CEQA review.

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- CHC and the Cultural Affairs Department, 433 South Spring Street, 10th Floor, Los Angeles, California 90013; Telephone: INFO Desk (213) 473-7700. Responsible for designation and monitoring of City of Los Angeles Historic-Cultural Monuments.
- Department of Building and Safety. Customer Call Center (888)-LA4-BUILD or outside Los Angeles County: (213) 977-6941, 201 N. Figueroa Street, Los Angeles, CA 90012. Maintains ZI codes for property parcels. The ZI 145 series is currently used for historic buildings.
- City Planning Department; Telephone: (213) 482-7077; Bureau of Engineering; Telephone: (213) 847-8704; and Community Redevelopment Agency (CRA) of the City of Los Angeles; Telephone: (213) 977-1600, maintain historical resources surveys.
- Bureau of Street Lighting; 600 S. Spring St. 14th Floor, Los Angeles, CA 90013. Telephone: (213) 847-6400, is responsible for historic street lights in the City.
- Los Angeles Conservancy, a regional non-profit preservation organization; 523 W. 6th St. Los Angeles, CA 90014, Telephone: (213) 623-2489. This organization's activities include:
 - Historical resources surveys;
 - Information regarding how to obtain the results of surveys; and
 - Information regarding the significance of particular architects and buildings.
- Recording Historic Structures, HABS/Historic American Engineering Record, John A. Burns, ed, Washington: American Institute of Architects Press, 1989.
- References to other sources are included within HABS/Historic American Engineering Record, An Annotated Bibliography, compiled by James C. Massey, et al, NPS, 1992.

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Exhibit D.3-1 NATIONAL CRITERIA AND STANDARDS

National Register

To be eligible for listing in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. These criteria are the Register's standards for determining the significance of properties. Buildings, sites, districts, structures, or objects of potential significance must possess integrity of location, design, setting, and materials and meet one or more of four established criteria:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D Yield, or may be likely to yield, information important in prehistory or history.

Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating **Historic Buildings**

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- 2. The historic character of a property shall be retained and preserved. The removal of historic material or alteration of features and spaces shall be avoided.
- 3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other buildings, shall not be undertaken.
- Most properties change over time; those changes that have acquired significance in their own 4. right shall be retained and preserved.
- Distinctive features, finishes and construction techniques or examples of skilled 5. craftsmanship, which characterize an historic property, shall be preserved.
- 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive historic feature, the new feature shall match

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the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

- 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

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Exhibit D.3-2 CALIFORNIA REGISTER CRITERIA AND EVALUATION SYSTEM

The evaluation instructions and classification system proscribed by OHP in its "Instructions for Completing the California Historical resources Inventory Form, June 1990" provide the following general categories of evaluation. Categories 1 through 4 involve various levels of National Register eligibility. The California Register may include surveyed resources ranked from 1 - 5.

- 1. Listed in the National Register.
- 2. Determined eligible for listing in the National Register in a formal process involving federal agencies.
- 3. Appears eligible for listing in the National Register in the judgment of the persons completing or reviewing the form.
- 4. May become eligible for listing in the National Register.
- 5. Ineligible for the National Register, but of local interest.
- 6. None of the above.
- 7. Undetermined.

Resources eligible to be nominated for listing in the California Register include:

- Individual historical resources;
- Historical resources contributing to the significance of an historic district under criteria adopted by the Commission;
- Historical resources identified as significant in historical resource surveys, if the survey meets the criteria listed in California Public Resources Code . 5024.1(g); and
- Locally designated resources if the criteria for local designation have been determined by the Commission to be consistent with California Register criteria adopted by the Commission.

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Exhibit D.3-3 CITY OF LOS ANGELES CRITERIA

City of Los Angeles Historic-Cultural Monument Designation

In the City of Los Angeles, resources may be designated as Historic-Cultural Monuments under Sections 22.120, et seq., of the Los Angeles Municipal Code (LAMC). An historical or cultural monument is defined as:

"any site (including significant trees or other plant life located thereon), building or structure of particular historic or cultural significance to the City of Los Angeles, such as historic structures or sites in which the broad cultural, political, economic or social history of the nation, state or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history, or which embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius influenced his age."

City of Los Angeles Historic Preservation Overlay Zones (HPOZs)

HPOZs are essentially locally designated historic districts or groupings of historical resources. Under the HPOZ ordinance (LAMC Section 12.20.3.), to be significant, structures, natural features or sites within the involved area or the area as a whole shall meet one or more of the following criteria:

- has substantial value as part of the development, heritage or cultural characteristics of, or is (A) associated with the life of a person important in the history of the city, state or nation;
- (B) is associated with an event that has made a substantial contribution to the broad patterns of our history;
- (C) is constructed in a distinctive architectural style characteristic of an era of history;
- (D) embodies those distinguishing characteristics of an architectural type or engineering specimen;
- (E) is the work of an architect or designer who has substantially influenced the development of the City;
- (F) contains elements of design, details, materials or craftsmanship which represent an important innovation;
- (G) is part of or related to a square, park or other distinctive area and should be developed or preserved according to a plan based on a historic, cultural, architectural or aesthetic motif;
- (H) owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or City; or
- (I) retaining the structure would help preserve and protect an historic place or area of historic interest in the City.

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Exhibit D.3-4 STATE OFFICE OF HISTORIC PRESERVATION (OHP) LIST OF NON-ADVERSE REPAIRS AND IMPROVEMENTS

According to the OHP and the Advisory Council on Historic Preservation, the following work does not usually involve adverse effect on historical resources:

- 1. Electrical work, limited to upgrading or in-kind replacement;
- 2. Plumbing work, limited to upgrading or in-kind replacement, with the exception of historic fixtures which shall be repaired when possible;
- 3. Installation of mechanical equipment, which does not affect the exterior of the building or require installation of new ductwork throughout the interior;
- 4. Repainting of existing painted surfaces if destructive surface preparation treatments are not used, including, but not limited to, water blasting, sandblasting, and chemical removal;
- 5. In-kind repair/partial replacement of porches, cornices, exterior siding, doors, balustrades, stairs, or other trim;
- In-kind replacement of deteriorated windows; 6.
- 7. Replacement of windowpanes in-kind or with double or triple glazing so long as glazing is clear and not colored and replacement does not alter existing window material and form;
- 8. Caulking and weather stripping with compatibly colored materials;
- 9. In-kind repair/replacement of roof materials;
- 10. Installation of insulation, with the exception of urea formaldehyde foam insulation or any thermal insulation with a water content into wall cavities, provided that decorative interior plaster or woodwork or exterior siding is not altered by this work item;
- 11. Installation of fire or smoke detectors:
- 12. Installation of security devices, including deadbolts, door locks, window latches, and door peepholes, and the installation of electronic security systems;
- 13. In-kind repair/replacement of driveway or walkways;
- 14. In-kind repair/replacement of fencing;

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- 15. Floor refinishing;
- 16. In-kind repair/replacement of floors;
- 17. Installation of grab bars and minor interior modifications for handicap accessibility;
- 18. In-kind repair/replacement of signs and awnings; and
- 19. In-kind repair/replacement of interior stairs.

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Exhibit D.3-5 ARCHITECTURAL STYLES AND PERIODS

The following architectural styles and related periods of significance are historically important in Los Angeles:

Adobe	1800-1870
Monterey	1840-1870
Greek Revival	1825-1860
Classical Revival	1840-1870
Italianate	1870-1900
Gothic Revival	1870-1900
Eastlake	1870-1900
Second Empire	1870-1885
Queen Anne	1880-1905
Chateauesque	1890-1915
American Foursquare	1894-1908
Turn of the Century	1895-1905
Beaux Arts	1895-1930
Mission Revival	1890-1915
Craftsman	1895-1925
Pueblo Revival	1900-1930
Commercial Vernacular	1910-1925
Spanish Colonial Revival	1915-1930
Modernism	1920-1940
Art Deco	1920-1940
Monterey Revival	1925-1940
Colonial Revival	1930-1945
Tudor Revival	1930-1945
Streamline Moderne	1935-1945
PWA Moderne	1930-1940
California Ranch House	1935-1990
Corporate International	1945-1990

Source: Los Angeles Conservancy, 1995.

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Exhibit D.3-5 ARCHITECTURAL STYLES AND PERIODS

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Second Empire	1870-1885
Queen Anne	1880-1905
Chateauesque	1890-1915
American Foursquare	1894-1908
Turn of the Century	1895-1905
Beaux Arts	1895-1930
Mission Revival	1890-1915
Craftsman	1895-1925
Pueblo Revival	1900-1930
Commercial Vernacular	1910-1925
Spanish Colonial Revival	1915-1930
Modernism	1920-1940
Art Deco	1920-1940
Monterey Revival	1925-1940
Colonial Revival	1930-1945
Tudor Revival	1930-1945
Streamline Moderne	1935-1945
PWA Moderne	1930-1940
California Ranch House	1935-1990
Corporate International	1945-1990

Source: Los Angeles Conservancy, 1995.

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E. GEOLOGY

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E.1. GEOLOGIC HAZARDS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- VI.a.i): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
- VI.a.ii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?
- VI.a.iii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?
- VI.a.iv): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?
- VI.c): Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- VIII.j): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

B. Introduction

Geologic processes that result in geologic hazards include: surface rupture, ground shaking, ground failure, tsunamis, seiches, landslides, mudflows, and subsidence of the land. Because the region is generally considered to be geologically active, most projects will be exposed to some risk from geologic hazards, such as earthquakes. Thus, significant geologic impacts exceed the typical risk of hazard for the region.

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¹ Sediment and erosion are addressed in E.2. SEDIMENTATION AND EROSION.

Surface ruptures are the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. The effects of ground shaking, the actual trembling or jerking motion of the ground during an earthquake, can vary widely across an area and depend on such factors as earthquake intensity and fault mechanism, duration of shaking, soil conditions, type of building, and other factors. Ground failure results from the cyclical ground acceleration generated during an earthquake, producing landslides, ground cracking, subsidence and differential settlement. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils.

Tsunamis are large ocean waves generated by large-scale, short-duration submarine earthquakes. Tsunami waves are capable of traveling great distances (over 1,000 miles) and damaging low-lying coastal regions. Seiches are waves formed from oscillations in enclosed or restricted bodies of water (i.e., harbors, lakes). Seiches can cause water to overtop reservoirs and lakes.

Mudflows and landslides are the downslope movement of soil and/or rock under the influence of gravity. Mudflow and landslide processes are influenced by factors such as thickness of soil or fill over bedrock, steepness and height of slope, physical properties of the fill, soil or bedrock materials and moisture content. These factors may increase the effective force of gravity upon a slope, decrease the ability of a slope to resist gravitational influence or a combination of the two, which can lead to mudflows and landslides.

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the Earth's surface, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Settlement is the gradual downward movement of a structure due to compression of the soil below the foundation. The principal cause of subsidence is the extraction of subsurface liquids, whereas settlement results from the compression of soils due to the weight of the structure or by surcharging following the placement of fill.

Construction is regulated by the Los Angeles Building Code, Sections 91.000 through 91.7016 of the Los Angeles Municipal Code (LAMC). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from geological hazards. Necessary permits, plan checks, and inspections are also specified.

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C. Screening Criteria

- Is the project located in an area susceptible to unusual geologic hazards considering the following:
 - Designation on official maps and databases;
 - Past episodes on-site or in the surrounding area; and
 - Physical properties of the site, including the topography, soil or underlying bedrock (including thickness of bedrock and soil compressibility, strength, moisture content, and distribution)?
- Would the project include any of the following:
 - Placement of structures designed for regular occupancy or infrastructure on fill; or
 - Active or planned extraction (removal) of mineral resources, groundwater, oil, or natural gas on-site or in the surrounding area?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Geologic Hazards, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Geologic Hazard impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. To assist in determining whether the project is located in an area of known or suspected geologic hazard, consult the following maps and databases:

- Environmental and Public Facilities Maps, including:
 - Alquist-Priolo Special Study Zones and Fault Rupture Study Areas,
 - Inundation and Tsunami Hazard Areas.

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- Areas Susceptible to Liquefaction,
- Landslide Inventory and Hillside Areas,
- Areas Containing Significant Mineral Deposits, and
- Oil Field and Oil Drilling Areas;
- ZIMAS (Zone Information & Map Access System): http://zimas.lacity.org
- Navigate LA: http://navigatela.lacity.org/
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) for tsunami hazards

Using the above information, field research, published reports, or other appropriate maps or studies, as available, assess whether the project is located in an area susceptible to geologic hazards. Consider past episodes on site or in the surrounding area; steepness/height of slopes; physical properties of the soil; the presence of fill; or extraction of resources below the surface. If necessary, consult with the Bureau of Engineering or Department of Building and Safety.

Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Description of the physical setting and geology, such as the topography, steepness and height of slopes or cliffs, physical properties of the soil and underlying bedrock, proximity to bodies of water, presence of fill, and extraction or mining activities;

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- Identification of the geologic processes that may result in geologic hazards on the project site or in the surrounding area; and
- Summary of requirements and/or policies for geologic hazards that apply to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site, and surrounding area, determine the geologic hazards that the project would cause or accelerate. Substantial damage to structures or infrastructure and exposure of people to substantial risk of injury is related to the probable frequency of potential geologic hazards (i.e., likely number of events per year or decade) and the probable severity of the consequences to people, property, or infrastructure that may result (i.e., injuries to people and the valuation of property damage). Consider that the geologically active nature of the region means that most projects will be exposed to geologic hazards, such as seismic activity. Significant impacts, as indicated by the significance threshold, exceed the typical risk of hazard Consider the type of uses that would be included in the project, the for the region. characteristics of the occupants of the project, and the change in risk of hazard or damage that would result from the project.

Cumulative Impacts

Review the description of the related projects. Identify those with elements, activities, or operations which would cause or accelerate geologic hazards that would extend off-site. Consider the impact from the combined effect of the related and proposed projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use interim precautionary steps during construction; and
- Use design and structural features that exceed the requirements of the Los Angeles Building Code and Planning and Zoning Code. (Chapter 1 of the Municipal Code).

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3. DATA, RESOURCES, AND REFERENCES

Department of Building and Safety, 201 North Figueroa Street, 4th Floor, Construction Services Center, Los Angeles, California 90012; Telephone: (213) 833-8389.

Bureau of Engineering, Geotechnical Engineering Group, 650 S. Spring St., Suite 495, Los Angeles, CA 90014. (213) 847-4010.

Bureau of Engineering, Structural Engineering Group, 650 S. Spring St., Suite 400, Los Angeles, CA. 90014. (213) 847-8774.

City Planning Department, Environmental and Public Facilities Maps (1996):

- Alquist-Priolo Special Study Zones and Fault Rupture Areas illustrates the approximate locations of Alquist-Priolo Special Study Zones and fault rupture areas;
- Inundation and Tsunami Hazard Areas:
- Areas Susceptible to Liquefaction;
- Landslide Inventory and Hillside Areas illustrates the approximate locations of hillside areas, areas with known or probable bedrock landslides, and areas of surficial landslides larger than five acres;
- Areas Containing Significant Mineral Deposits identifies areas within a Mineral Resource Zone (MRZ) 2. Projects within this designation may experience subsidence/settlement where mineral extraction has occurred or is planned; and
- Oil Field and Oil Drilling Areas show areas known to have supported at least six months of oil production, indicating an increased risk for subsidence.
- ZIMAS (Zone Information & Map Access System) http://zimas.lacity.org
- Navigate LA http://navigatela.lacity.org/
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps.

Planning and Zoning code is available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, CA., 90012; Online at: http://amlegal.com/los angeles ca/.

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Selected Legislation

Federal

Flood Insurance Rate Maps (FIRMs) (10 CFR Section 1022.11, 43 CFR Section 64.3)

FIRMs are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development (HUD) after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. They are used in making flood plain determinations and to determine if a proposed action is located in the base or critical action flood plain, as appropriate.

State

Alquist-Priolo Earthquake Fault Zoning Act (PRC Section 2621.5)

Provides policies and criteria to assist cities, counties, and state agencies in the development of structures for human occupancy across the trace of active faults. Intended to provide the citizens of the state with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings, including historical buildings, against ground shaking.

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E.2. SEDIMENTATION AND EROSION

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

Projects that change the natural ground surface may expose earth materials, which are subject to erosion from both wind and water forces. Impacts are related to the amount of land exposed to wind and water forces and the characteristics of the site. Such erosion affects not only the integrity of the ground surface, but also results in the transport and deposition of dust in the surrounding locale and/or sediments in downstream water bodies. Impacts of sediment runoff on water quality are addressed in G.2. SURFACE WATER QUALITY.

Construction is regulated by the Los Angeles Building Code (Sections 91.7000 through 91.7016 of the Los Angeles Municipal Code (LAMC)). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards (cu.yd.) that will occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by the Department of Building and Safety.

Under the National Pollutant Discharge Elimination System (NPDES), the State Water Resources Control Board has issued two general stormwater discharge permits for Los Angeles County to cover industrial and construction activities. The permits are required for specific industry types based on standard industrial classification and for construction activities on five acres or more. The Regional Water Quality Control Board (RWQCB) oversees implementation and enforcement of the general permits, including Waste Discharge Requirements (WDR). The Public Works Department, Bureau of Engineering, Stormwater Management Division, is the agency responsible for overseeing implementation of permit responsibilities for the City. Presently, under the General

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Construction Stormwater Permit, projects greater than five acres are required to incorporate, to the maximum extent possible, permanent or post-construction best management practices (BMPs) in project planning and design.

C. **Screening Criteria**

- Would the project result in grading, clearing or excavation of more than 20,000 cu.yd. on a slope of ten percent or more?
- Does the project include grading, clearing, or excavation activities in an area of known or suspected erosion hazard (based upon designation on official maps and databases)?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Sedimentation and Erosion, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Sedimentation and Erosion impact from the proposed project.

D. **Evaluation of Screening Criteria**

Review the description of the proposed project, project site, and surrounding area. To determine if the project is located in an area of known or suspected erosion hazard, consult the following maps and databases:

- Environmental and Public Facilities Maps, Landslide Inventory and Hillside Areas; and
- Zimas (Zone Information & Map Access System) http://zimas.lacity.org/
- Navagate LA http://navagatela.lacity.org

Indications of high and very high levels of erosion hazard indicate known or suspected erosion hazard. Determine whether the project includes grading, clearing or excavation activities that could result in sedimentation and erosion impacts. If necessary, use field research, published reports, or other appropriate studies, as available, or consult with the Bureau of Engineering or Department of Building and Safety. Compare this information to the Screening Criteria.

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2. **DETERMINATION OF SIGNIFICANCE**

A. **Significance Threshold**

A project would normally have significant sedimentation or erosion impacts if it would:

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

B. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the physical setting and geology, such as the topography of the site, steepness and height of slopes or cliffs, characteristics of the soil, and type and extent of vegetation;
- Identification of the erosion processes that may result in geologic hazards on the project site or in the surrounding area; and
- Summary of requirements and/or policies for erosion hazards that apply to project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site, and surrounding area, determine the erosion hazards that the project would cause or accelerate. Assess the probable frequency of potential geologic hazards (i.e., likely number of events per year or decade) and the probable severity of the consequences to people, property, or infrastructure that may result (i.e., injuries to people and the valuation of property damage). Consider the type of uses that would be included in the project, the characteristics of the occupants of the project, and the change in risk of

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hazard or damage that would result from the project. Determine whether sediment runoff would be contained or controlled on-site. Exposure between November 1 and April 15 (the "rainy season") and removal of vegetative cover are more likely to result in erosion and sedimentation. Conditions such as steep slopes and cliffs or impermeable soil can also exacerbate runoff.

Cumulative Impacts

Review the description of the related projects. Identify those with activities or operations which would cause or accelerate erosion hazards. Assess the probable frequency of potential geologic hazards and the probable severity of the consequences to people. property, or infrastructure that may result from the combined effect of the proposed and related projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Establish an erosion control plan prior to construction;
- Revegetate cleared areas as soon as feasible after grading or construction with temporary seeding, permanent seeding, mulching, and stabilization, vegetative buffer strips, protection of trees, or other soil stabilization practices;
- Reduce sedimentation by using detention basins, straw bale dikes, silt fences, earth dikes, brush barriers, velocity dissipation devices, drainage swales, check dams, subsurface drains, pipe slope drains, level spreaders, storm drain inlet protection, rock outlet protection, sediment traps, temporary sediment basins, or other controls; and
- Incorporate permeable paving materials that permit water penetration.

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3. DATA, RESOURCES, AND REFERENCES

Department of Building and Safety, 201 North Figueroa Street, 3rd Floor, Construction Services Center, Los Angeles, California 90012; Telephone: (888) 524-2845. Technical requirements for grading activities and grading plan submittals are contained in the Los Angeles Building Code, and are outlined in form B-164 of the Department of Building and Safety.

Environmental and Public Facilities Maps (1996) Landslide Inventory and Hillside Areas illustrates the approximate locations of hillside areas, areas of known or probable bedrock landslides, and areas of surficial landslides larger than five acres.

General Permit No. CA 5000002 - WDR for Stormwater Runoff Associated with Construction Activities (Requirements of the NPDES).

Navigate LA available online at: http://navagate.la.lacity.org.

Zone Information & Map Access System, (ZIMAS) available online at: http://zimas.lacity.org

See also E.1. GEOLOGIC HAZARDS.

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E.3. LANDFORM ALTERATION

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

- I.b): Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- V.c): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

B. Introduction

This section addresses the potential effects of a project on distinct and prominent geologic or physical features, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds and wetlands. While some of the environmental impacts surrounding these resources are evaluated in other sections of this document (such as A.1. AESTHETICS), this section directly addresses the alteration of these landforms, which primarily occurs through grading and other earth moving activities. These activities may alter landforms in various ways, including lowering ridgelines, covering wetlands, filling canyons, or removing rock outcrops.

All grading in Los Angeles is regulated by the Los Angeles Building Code (Sections 91.7000 through 91.7016, of the Los Angeles Municipal Code (LAMC)), which includes requirements for excavations, fills, and the planting and irrigation of graded slopes. Grading may also be regulated by policies, which apply to specific geographic areas, such as those, which may be imposed by a specific plan, a local coastal program or the California Coastal Act, the Community Plan, or the General Plan and its elements.

Examples of specific policies that support the protection of distinct and prominent landforms include:

Sections 30251 and 30253 of the California Coastal Act which require that activities within the coastal zone (generally includes land and water 1000 yards inland of the mean high tide line) minimize alteration of natural landforms and do not create or contribute to erosion, geologic instability, etc., in coastal areas;

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- Several Community Plans encourage "cluster type" development in hillside areas in order to minimize the amount of grading and alteration of the natural landform; and
- The Mulholland Scenic Parkway Specific Plan includes policies, which regulate grading activities within the specific plan area. These policies are intended to minimize grading, preserve significant ridgelines, and minimize alteration of the natural landform characteristics of the Santa Monica Mountains through the use of grading standards set forth in the City Planning Department's Landform Grading Manual.

C. Screening Criteria

• Does the project site contain any distinct and prominent geologic or physical features that may be physically altered by project implementation?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Landform Alteration, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Landform Alteration from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, proposed grading plans and proposed project operations. Identify any distinct and prominent resources on the project site, which may include, but are not limited to, hilltops, ridgelines, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands. Determine whether the project activities could physically alter the identified landform(s) through, for example: lowering ridgelines; reducing wetlands or streambeds; filling canyons; or removing rock outcrops. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact on landform alteration if one or more distinct and prominent geologic or topographic features would be destroyed, permanently covered or

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materially and adversely modified. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds and wetlands.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Describe the existing slopes and topography of the site and surrounding areas, including any distinct or prominent geologic or physical features. Include a map, as appropriate;
- Identify any specific grading or landform alteration policies that apply to the project site as imposed by any specific plan, local coastal program or the California Coastal Act, the Community Plan, the General Plan and its elements, the Hillside Ordinance or other portions of the LAMC; and
- Describe any drainage and diversion structures, retaining walls, cribbing and other surface protection devices existing on the site or immediately adjacent.

Project Impacts

Review the grading and construction plans to identify which distinct and prominent geologic or physical features on the project site would be impacted by project construction or operation. Determine what type of impact the project would have on the resource(s), such as major changes to existing slopes or ridgelines, the filling of canyons, removal or destruction of rock outcrops, covering of wetland areas, etc. Determine whether these changes would destroy an existing prominent resource and/or whether other project activities would result in adverse modifications. Note how long modifications would last and whether the resource would be restored.

The project-grading plan may be used to determine grading amounts and other earth moving activities that may impact a landform. Identify the location and quantities of cut and fill areas, height of cut and/or fill slopes, steepness and stability of proposed slopes and structures, details and location of proposed drainage devices, and, if it would impact an identified landform, the location of disposal sites for excess materials.

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Cumulative Impacts

Review the list of related projects. Identify those with distinct and prominent geologic or physical features that would be altered. Assess the impact on these features from implementation of the related projects in the manner described above in Project Impacts. Identify cumulative impacts that would occur and determine their significance. Consider multiple impacts on a single feature or the combined impact on a group of like features.

Sample Mitigation Measures

Potential mitigation measures include the following:

- the modification of grading or excavation plans to avoid a distinct landform; and
- a reduction in amount of grading to conform to natural contours.

3. DATA, RESOURCES, AND REFERENCES

Specific plans, Coastal Act, especially policies 30251 and 30253, for projects within the coastal zone, and various specific plans, which include hillside areas, such as the Mulholland Scenic Parkway Specific Plan. Available from the City Planning Department's Central Publications Unit (see address and telephone below).

Landform Grading Manual, available from the City Planning Department's Central Publications Unit at 200 N. Spring St. 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255.

See also E.1. GEOLOGIC HAZARDS and E.2. SEDIMENTATION AND EROSION.

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E.4. MINERAL RESOURCES

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- X.a): Would the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the state?
- X.b): Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

B. Introduction

Underlying the City of Los Angeles are finite deposits of non-renewable mineral resources, including petroleum and natural gas, limestone, and aggregate (e.g., rock, sand, and gravel). Development that includes placement of structures over resource areas or blocks access to a resource area results in the loss of availability of resources. Impacts are related to the characteristics of the resource and the degree of loss.

Federal, State and City agencies regulate or have documented the presence of mineral resources. The State Geologist, California Division of Mines and Geology (CDMG), and State Mining and Geology Board (SMGB) provide assistance and direction with regard to mineral resources. The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. (See Exhibit E.4-1) Projects located within the MRZ-2 designation are subject to City policies established in Section VII, Mineral Resources, of the Conservation Element. The Bureau of Land Management (BLM) and the United States Forest Service (USFS) issue permits for mining activity on federal lands.

C. Screening Criteria

Is the project located within, or would it block access to, a MRZ-2, or other known or potential mineral resource area (based upon designation on official maps and databases such as those identified below)?

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A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Mineral Resources, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Mineral Resources from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. determine if the project is located in, or could block access to, a mineral resource area, consult the following maps:

- Environmental and Public Facilities Maps, including:
 - Areas Containing Significant Mineral Deposits; and
 - Oil Field and Oil Drilling Areas.

In addition, use field research, published reports, or other appropriate studies, as available, to assess whether the project is located in a MRZ-2 or other important mineral resource area. Consult with the CDMG as needed.

Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 or other known or potential mineral resource area; and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

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B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the project site and surrounding area;
- Discussion of the mineral resource on the site, as well as within a regional and statewide context; and
- Summary of the requirements and/or policies for mineral resources that apply to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, assess whether implementation of the project would result in a loss of, or loss of access to, the identified mineral resource. Determine whether alternative means of accessing the mineral resource exist and whether the loss of access would be permanent or temporary. Also, consider the importance of the mineral on a state, regional and local level, in terms of economic value, remaining supply, and feasibility of recovering the resource.

Cumulative Impacts

Review the description of the related projects. Identify those with activities and operations, which are within, or would block access to, a MRZ-2 or other important mineral resource area. Assess whether the related projects would result in the cumulative loss of, or loss of access to the mineral resource(s). Consider the importance of the resource and then consider the impact from the combined effect of the proposed and related projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Design the project so that no or only nonpermanent structures are atop or blocking the mineral resource area; and
- Establish easements to preserve possible future use of the mineral resource.

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3. DATA, RESOURCES, AND REFERENCES

CDMG, Southern California Regional Office located at 655 S. Hope St., #700, Los Angeles, California 90017-3231; Telephone: (213) 239-0878. CDMG prepares a Mineral Land Classification Report for the City of Los Angeles area. The criteria used in the classification reports are established by the SMGB and are contained in California Surface Mining and Reclamation Policies and Procedures, Special Publication 51, 1983.

City Planning Department, Environmental and Public Facilities Maps (1996):

- Areas Containing Significant Mineral Deposits illustrates the approximate locations of MRZ-2 areas within the City of Los Angeles; and
- Oil Field and Oil Drilling Areas shows areas known to have supported at least six months of oil production.

Conservation Element of the General Plan, available from the City Planning Department's Central Publications Unit at 200 N. Spring St. 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255, Online at: http://www.lacity.org/PLN/.

Selected Legislation

State

Surface Mining and Reclamation Act of 1975

PRC Section 2711 declares that the extraction of minerals is essential to the continued economic well-being of the state and to the needs of the society, and that the reclamation of mined lands is necessary to prevent or minimize adverse effects on the environment and to protect the public health and safety.

Exhibit E.4-1 STATE MINING AND GEOLOGY BOARD (SMGB) MINERAL RESOURCE ZONE (MRZ) CLASSIFICATIONS

The SMGB classification system divides land into four MRZs, reflecting varying degrees of significance. These categories are as follows:

- MRZ-1: Areas where available geologic information indicates there is little likelihood for the presence of significant mineral resources;
- MRZ-2a: Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present, as determined by such evidence as drilling records, sample analysis, surface exposure, and mine information;
- MRZ-2b: Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present, as determined by limited data:
- MRZ-3a: Areas containing known mineral occurrences of undetermined mineral resource significance;
- MRZ-3b: Areas containing inferred mineral occurrences of undetermined mineral resource significance. Land classified MRZ-3b represents areas in geologic settings that appear to be favorable environments for the occurrence of specific types of mineral deposits; and
- MRZ-4: Areas of no known mineral occurrences where geologic information does not rule out either the presence or absence of significant mineral resources.

F. HAZARDS

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F.1. RISK OF UPSET/EMERGENCY PREPAREDNESS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- VII.a): Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- VII.b): Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment?
- VII.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 create a safety hazard for people residing or working in the project area?
- VII.f): For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- VII.g): Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

B. Introduction

Hazardous materials generally are chemicals, which have the capability of causing harm during an accidental release or mishap, and are characterized as being toxic, corrosive, flammable, reactive, an irritant or strong sensitizer. The term "hazardous substances" encompasses every chemical regulated by both the United States Department of Transportation's (DOT) "hazardous materials" regulations and the Environmental Protection Agency's (EPA) "hazardous waste" regulations, including emergency response. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Activities and operations that use or manage hazardous or potentially hazardous or explosive substances could create a hazardous situation if an accidental explosion or release of these substances occurred. Individual circumstances, including the type of substance, quantity used or managed, and the nature of the activities and operations, affect the probable frequency and severity of consequences from a hazardous situation. Federal, state, and local laws regulate the use and management of hazardous or potentially hazardous or explosive substances. For example, the Clean Air Act Amendments (CAAA) of 1990 require facilities that exceed federal threshold levels of listed substances to prepare Risk Management Plans. State threshold levels have also been established.

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Emergency response plans and emergency evacuation plans specify appropriate actions to be undertaken with regard to emergency situations such as warning systems, evacuation plans/procedures, and emergency action plans. These plans are required by state environmental and occupational health laws and regulations for businesses that use specified hazardous or extremely hazardous materials or involve a potential threatened release of acutely hazardous materials above certain threshold limits. Projects may require new or revised plans due to the construction or expansion of operations.¹

Creation of human health hazards or exposure of people to existing sources of potential health hazards, including asbestos, is addressed in F.2. HUMAN HEALTH HAZARDS. According to the federal Occupational Safety and Health Administration (OSHA), hazardous chemicals are chemicals that would be a risk to employees if there is exposure in the workplace. They are listed and regulated through OSHA and the California Occupational Safety and Health Administration (CalOSHA).

Toxic air emissions are addressed in B.3. TOXIC AIR CONTAMINANTS.

C. Screening Criteria

- Would the project use or manage hazardous or potentially hazardous or explosive substances (including, but not limited to, oil, pesticides, chemicals, or radiation)?
- Would the project require a new or revised risk management plan, emergency response, or emergency evacuation plan?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Risk of Upset/Emergency Preparedness, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Risk of Upset/Emergency Preparedness from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project. Determine whether operation or construction would involve the use, generation, disposal, transport, or management of potentially hazardous or explosive substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in

Risks due to earthquake-related hazards are addressed in E.1. GEOLOGIC HAZARDS.

sufficient quantities to cause a potential hazard. Emergency response and evacuation plans are required for businesses that use hazardous materials or involve a potential threatened release of acutely hazardous materials during operation or construction. Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the project site, including any on-site activities or structures;
- Physical description of land uses and activities in the surrounding area and along appropriate transportation routes (generally, from the project site to the nearest designated truck route), including distance to sensitive receptors, such as schools, hospitals, or residential uses;
- Description of emergency response or evacuation plan(s) affecting the project and/or the surrounding area; and
- Summary of the regulatory framework.

Project Impacts

Review the description of the proposed project. Identify the activities and operations which would involve the use, generation, disposal, transport, or management of potentially hazardous or explosive substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in sufficient quantities to cause a potential hazard. Estimate the probable frequency of a potential accidental release or explosion of a hazardous substance and the probable severity of the consequences to people or property that would result. Elements of individual projects, such as the type of substance, the quantity used or managed, and the nature of the activities and operations, affect the risk of accidental explosion or release of hazardous substances. Identify and evaluate project features or components that would reduce the risk associated with use or management of hazardous, potentially hazardous, or explosive substances. Consider the regulatory framework and determine the resulting risk.

Review applicable emergency response or evacuation plans. Determine the impact of the project on implementation of the plan(s) and whether the project would require new or expanded plans to be written, because of project activities or location.

Cumulative Impacts

Review the description of the related projects. Identify those with activities and operations which would involve the use, generation, disposal, transport, or management of potentially hazardous or explosive substances (including, but not limited to, oil, pesticides, chemicals, or radiation). Determine the combined impact from the related and proposed projects, in the same manner as described above for Project Impacts. Determine the cumulative impact on the implementation and adequacy of emergency response or evacuation plans due to increases in the amount of hazardous materials used or the location of the projects.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use non-toxic or less toxic substances in project construction or operation;
- Investigate opportunities and implement programs to reduce the amount of waste chemicals generated; and
- Redesign operations and or use alternate transportation routes.

3. DATA, RESOURCES, AND REFERENCES

Los Angeles Fire Department (LAFD), Bureau of Fire Prevention and Public Safety; 200 N. Main St., Room 1000, Los Angeles, CA. 90012; Telephone: Research Unit (213) 485-6021.

Los Angeles County Fire Department, Hazardous Materials Division; Telephone: (213) 890-4045.

CalOSHA Consultation Service; 10350 Heritage Park Dr., Suite 201, Santa Fe Springs, CA 90670. Telephone: (562) 944-9366, or Consultation Toll Free at (888) 963-9424.

Hazardous materials are defined and listed in various federal and state laws and regulations. These include, but are not limited to, 40 CFR 302 (hazardous substances), 40 CFR 261 (hazardous waste), 49 CFR 172.101 and appendices (hazardous materials), 22 CCR, Section 66261 (hazardous waste), 20 HSC, Chapter 6.5 (hazardous waste).

Requirements for emergency response plans, emergency evacuation plans, and emergency action plans can be found in numerous state and federal laws and regulations. A partial list includes, but is not limited to, the following: 29 CFR 1910.120; Title 8, CCR Sections 3215, 3220 and 5192; Title 22 CCR Section 66265.50-52; and 20 HSC Sections 25504 and 25534.

Risk Management Plans are required under certain conditions by federal and state laws and regulations. The regulations list substances and threshold levels that trigger preparation of Risk Management Plans. Some relevant federal regulations can be found in 40 CFR 68 et seq, which implement Section 112(r)(7) of the CAAA. Some State regulations are listed in Title 22 CCR Section 66261.113, 20 HSC Section 25531 et seg., Title 8 Section 5189, and Title 19 Sections 2510 and 2620 to 2732.

Work place operations and exposure are included in laws and regulations of OSHA and CalOSHA. See, for example, 29 CFR 1910 and Title 8, CCR, Section 5192(a)(3)(A) through (D) and Section 5155.

F.2. HUMAN HEALTH HAZARDS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- VII.a): Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- VII.b): Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment?
- Would the project emit hazardous emissions or handle hazardous or acutely VII.c): hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- VII.d): Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

B. Introduction

A variety of activities, operations, and projects can create human health hazards, or expose people to existing sources of potential health hazards. Impacts can result directly from a process or substance (e.g., removal of asbestos containing materials) or indirectly (e.g., transmission of a disease by rodents or insects). Individual circumstances, including the type of hazard and nature of the activities and operations, affect the probable frequency and severity of consequences from the health hazard. Federal, state, and local laws regulate these hazards.

Hazardous materials generally are substances which, by their nature and reactivity, have the capability of causing harm or a health hazard during normal exposure or an accidental release or mishap, and are characterized as being toxic, corrosive, flammable, reactive, an irritant or strong sensitizer. The term "hazardous substances" encompasses chemicals regulated by both the United States Department of Transportation's (DOT) "hazardous materials" regulations and the Environmental Protection Agency's (EPA) "hazardous waste" regulations, including emergency response. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. A designation of "acutely" or "extremely" hazardous refers to specific listed chemicals and quantities.

L.A. CEQA Thresholds Guide City of Los Angeles 2006 Page F.2-1 A health hazard may also occur where there is contact with or contamination from asbestos-containing material (ACM), which includes both friable ACM and Class I nonfriable ACM. Friable asbestos is more easily airborne than non-friable asbestos. Actions which may cause ACM to be broken, crumbled, pulverized, or reduced to powder include physical wear and disturbance by mechanical force, such as, but not limited to, sanding, sand blasting, cutting or abrading, improper handling or removal, or leaching of matrix binders. Class I nonfriable ACM includes, but is not limited to, fractured or crushed asbestos cement products, transite materials, mastic, roofing felts, roofing tiles, cement water pipes and resilient floor covering. Friable ACM is material containing more than 1 percent asbestos that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. California Occupational Safety and Health Administration (CalOSHA) defines asbestos-containing construction material as material which contains more than 1/10 of 1 percent asbestos by weight.

Risk of accidental explosion or release of hazardous substances and interference with an emergency response or evacuation plan is addressed in F.1. RISK OF UPSET/EMERGENCY PREPAREDNESS. According to the Occupational Safety and Health Administration (OSHA), hazardous chemicals are chemicals that would be a risk to employees if there were exposure above specified limits in the workplace. They are listed and regulated through OSHA and CalOSHA.

C. Screening Criteria

- Would the project create a health hazard, such as by introducing or directly modifying any of the following (or similar) facilities/activities:
 - Pipeline for hazardous or potentially hazardous or explosive substance which is:
 - More than eight miles in length; or
 - Less than eight miles in length with more than one-half mile subject to activity at any time;
 - Subterranean storage field or above ground tanks;
 - Solid waste facility;
 - Waste water treatment plant;
 - Major utility transmission or distribution facility;

- Land use or activity with recognized vector (e.g., rodents, insects, etc.) management problems; or
- Facility that uses or manages hazardous substances in sufficient quantities to cause a potential hazard?
- Would the project locate people adjacent to a health hazard, such as any of the above uses?
- Would the project create a health hazard through activities that involve the disturbance, removal, storage, or disposal of ACM or lead paints?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Human Health Hazards, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Human Health Hazards from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. Determine whether any of the uses or activities listed would be part of the project or adjacent to the project site. Health hazards may be created by increasing the frequency or severity of consequences from human exposure to hazardous materials or conditions. Vector management issues may include conditions or activities that attract rodents, insects, or other vectors. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and

• The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the project site and surrounding area, identifying potential health hazards and sensitive receptors; and
- Summary of applicable health and safety regulations.

Project Impacts

Review the description of the proposed project, project site, and surrounding area. Identify the activities and operations, which could create a health hazard. Specific circumstances, including the type of hazard, distance between the hazard and people, and the nature of the activities and operations, affect the probable frequency and severity of the consequences. Identify and evaluate project features or components that would reduce the human health risk below that typically associated with the proposed land use or activity. Considering this and the regulatory framework, determine the resulting hazard.

Cumulative Impacts

Review the description of the related projects. Identify those with activities or operations, which would create a health hazard, such as by introducing any of the uses or activities listed in the Screening Criteria to locations where people could be impacted. Determine the combined impact from the proposed and related projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Relocate storage of hazardous substances away from site boundaries;
- Develop a community warning plan;

- Provide spill containment measures;
- Develop a health and safety plan;
- Provide barriers that contain hazards (e.g., appropriate buffers between land uses or air curtains of sufficient strength to control insect vectors); and
- Reduce or eliminate conditions that exacerbate the frequency or severity of occurrences (e.g., avoid landscaping, such as ivy, which can provide nesting areas for rodents; prevent ponding of water which can provide breeding areas for mosquitos).

3. DATA, RESOURCES, AND REFERENCES

Los Angeles County Department of Health Services; 313 N. Figueroa St., Los Angeles, CA 90012. Telephone: (213) 240-8144.

South Coast Air Quality Management District (SCAQMD), Rules and Regulations. Regulation X – Subpart M and Rules 470, 1108, 1108.1, 1120, 1403, and 1414. Information regarding a particular rule or regulation may be obtained by calling the SCAQMD at (909) 396-2000 or 1-800-CUT-SMOG.

Federal extremely hazardous substances and planning thresholds are listed in 40 CFR 355, Appendices A and B. State extremely hazardous substances and planning thresholds are referenced in 19 CCR 2729(a). State acutely hazardous materials and threshold quantities are listed in 8 CCR 5189, Appendix A and referenced in 20 HSC 25532.

State extremely hazardous wastes are asterisked in 22 CCR, Div. 4.5, Chapter 11, Appendix X and referred to in 22 CCR 66261.110 and 66261.113.

State and federal acutely hazardous wastes are listed in 22 CCR 66261.33(c) and 40 CFR 261. Subpart D, respectively.

Asbestos-containing construction material is defined in 8 CCR 1529(b), a CalOSHA regulation.

See also F.1. RISK OF UPSET/EMERGENCY PREPAREDNESS.

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G. WATER RESOURCES

G. WATER RESOURCES

City of Los Angeles L.A. CEQA Thresholds Guide

G.1. SURFACE WATER HYDROLOGY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- VIII.c): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- VIII.d): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- VIII.e): Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff?
- VIII.g): Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- VIII.h): Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?
- VIII.i): Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- XVI.b): Would the project result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?
- XVI.c): Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

B. Introduction

This section addresses the potential surface water hydrology impacts that may be associated with the implementation of a project, including flood hazard impacts and changes in the amount or movement of surface water. Surface water impacts may occur when a project results in either

increased on- or off-site storm water flows, changes in absorption rates, alterations to existing surface water flow patterns or directions (including the intake and use of water from a surface water body), or other factors which result in a changed rate of flow. Surface waters include lakes, rivers, streams, reservoirs, the ocean, and similar water bodies. Flood hazard is defined as flooding which occurs during a storm event, particularly the 50-year developed storm event. Impacts may also occur when development of a project results in the depletion of natural flood plain values through development of land within a flood plain area, which is accounted for in the 50-year developed storm event. These impacts typically result in an increased potential for flood hazard.

C. Screening Criteria

- Is the project located within a 100-year flood plain, an area designated as hillside (as identified in the Los Angeles Municipal Code (LAMC) Section 91.7001), or other known flood-prone area?
- Would run-off from the project site drain onto an unimproved street or on to adjacent properties other than public right-of-way (ROW)?
- Would project implementation affect a surface water body such that the amount of surface water, current, course or direction of flow would change?
- Would the run-off factor for the developed project site exceed the percentage of imperviousness for the existing land use category, as contained in the Bureau of Engineering Manual, Part G, Storm Drain Design?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Surface Water Hydrology, and review the associated Methodology to Determine Significance, as appropriate.

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The 50-year developed storm event is the maximum predicted rainfall event used by the City and County of Los Angeles for determining storm water runoff quantities utilized in the design of the local storm drain system. This specification has been incorporated in the Bureau of Engineering Manual Part G, Storm Drain Design. The year refers to a calculated storm magnitude, which would occur with an approximate frequency of every 50 years. "Developed" refers to hydrology calculations, which assume that all land is developed according to its general plan/zoning designation. A "developed condition" permeability factor is assigned to each parcel, even if it is currently vacant, in order to design adequate storm drain facilities for future conditions.

A "no" response to each of the preceding questions indicates that there would normally be no significant impact on Surface Water Hydrology from the proposed project.

D. Evaluation of Screening Criteria

Identify the location of the proposed project site using the Environmental and Public Facilities Maps (100 Year and 500 Year Flood Plains and Landslide Inventory and Hillside Areas) and/or relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM). In addition, use the United States Geological Survey (USGS) topographic map(s) for the site and any available project or field study information to determine the potential for flooding.

Determine whether changes to the project site would cause run-off to drain on to an unimproved street or on to adjacent properties other than public ROW. Review the proposed activities and geological conditions of the project site and surrounding area to determine the project's potential to affect the existing current, direction of flow, or amount of water in a surface water body, including lakes, rivers, streams, or the ocean. Consult the Department of Public Works Bureau of Engineering, Los Angeles County Flood Control District and the Army Corps of Engineers (ACOE), as necessary.

Review the project plans and identify the percentage of imperviousness for the site, after project completion. Compare to the percentage for the existing zoning classification reproduced in Exhibit G.1-1. See the Bureau of Engineering Storm Drain Manual if assistance is needed.

Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

Significance Threshold

A proposed project would normally have a significant impact on surface water hydrology if it would:

- Cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or

Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Methodology to Determine Significance

Environmental Setting

Describe the project site, including the topography, soil types, location and size of impermeable surfaces (buildings, paving, hardscape, parking lots), location within a flood plain, and the size and location of drainage facilities. Note the existing direction of flow of surface water runoff from the site. Identify storm drains and surface water bodies to which the runoff drains directly or eventually.

Project Impacts

Determine whether the project would result in a change in water flows during a projected 50-year developed storm event that would flood the site or off-site properties, upstream or downstream and cause harm to people or damage to property or sensitive biological resources (see C. BIOLOGICAL RESOURCES for a definition of sensitive biological resources). Consider topography, soil types, location and size of impermeable surfaces, the size and location of drainage facilities, and flood control facilities. Mechanisms of flood control include, but are not limited to: dams, flood control basins, levees, channelization, pumping stations, upstream retention, diversion of run-off, and spreading grounds. Also, consider the nature of the land uses involved when determining the likelihood of harm or damage. (The City has designated certain land uses as appropriate to locate within a defined flood plain.)

Determine whether the project would result in an increase or decrease of water in a surface water body during project construction or operation, and whether project-related changes in the current or direction of flow of water would be permanent and adverse. Consult with the Bureau of Engineering, the Los Angeles County Flood Control District, or the ACOE, as appropriate.

Cumulative Impacts

Identify the related projects that could affect the same surface water body or flood plain as the proposed project. Using the methodology identified in Project Impacts, determine the combined effect of the proposed and related projects. Consult with the Bureau of Engineering and other flood control agencies, as appropriate.

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Sample Mitigation Measures

Potential mitigation measures include the following:

- Construct new or improved existing storm water management facilities to reduce or retard the amount of peak runoff from the project site. Such measures may include the construction of detention basins or other structures that will slow down or delay the peak flow of storm water runoff from the site;
- Redesign the project such that structures and other important facilities that would be adversely affected by flooding are no longer located within flood hazard areas or so that the floodway open space is preserved;
- Raise the building pad or ground floor of proposed structures to an elevation above flood prone areas; and
- Reduce impervious surfaces and materials. Maximize landscaped and natural areas.

3. DATA, RESOURCES, AND REFERENCES

Bureau of Engineering Public Counters. Construction Services Center, 4th Floor, 201 North Figueroa Street, Los Angeles, California 90012; Telephone: (213) 977-6032. Valley District, Van Nuys Municipal Building, 14410 Sylvan Street, 2nd Floor, Van Nuys, California 91401; Telephone: (818) 756-8421. Harbor District, San Pedro Municipal Building, 638 South Beacon Street, Room 400, San Pedro, California 90731; Telephone: (310) 732-4677. West Los Angeles District, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025-5516; Telephone: (310) 575-8384.

Bureau of Engineering, Structural and Technical Engineering, 650 South Spring Street, Room 400, Los Angeles, California 90014-1913; Telephone: (213) 847-4010.

Department of Building and Safety, Construction Services Center, 201N. Figueroa St., 4th Floor, Los Angeles, California 90012; Telephone: (213) 847-8774.

Los Angeles County Flood Control District, 900 South Fremont, Alhambra, California 91803; Telephone: (626) 458-5100.

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ACOE, 911 Wilshire Boulevard, #1525, Los Angeles, California 90017; Telephone: (213) 452-3908.

Bureau of Engineering Manual, Part G, Storm Drain Design.

Flood Insurance Rate Maps (FIRMs) (10 CFR Section 1022.11, 43 CFR Section 64.3). FIRMs are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development (HUD) after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. They are used in making flood plain determinations and to determine if a proposed action is located in the base or critical action flood plain, as appropriate.

USGS topographic maps.

City Planning Department, Environmental and Public Facilities Maps (1996):

- 100 Year and 500 Year Flood Plains; and
- Landslide Inventory and Hillside Areas.

Exhibit G.1-1 DEVELOPMENT CLASSIFICATIONS (Typical Percentage of Imperviousness, by Zone)

Zoning Classification	Type of Development	I_d
	Park (lawn areas only)	15
	Undeveloped Hillside or Mountainous Areas ^a	35
A1, A2, RA	Agricultural and One-Family Dwelling	35
RE11, RE15, RE20, RE40	One-Family Dwelling - Level Area - Hillside Area	
R1, RD1.5, RD2	One-Family Dwelling - Large Hillside Lot	50
RS, R1, RE9	One-Family Dwelling - Level Area - Hillside Area	
R2, RW1, RW2, RD3, RD4, RD5, RD6	Multiple Dwelling	_ 60
R3	Multiple Dwelling	70
R4, R5, P, PB, CR, C1, C2, C4, C5, CM, MR1, MR2, M1, M2, M3	Multiple Dwelling, Parking, All Commercial and Manufacturing	_ 100
	Playgrounds, Schools	100
RPD^b	$^{3}\!\!/_{4}$ of land area with I_{d} per development above; $^{1}\!\!/_{4}$ of land area with I_{d} for park	

Notes:

I_d is the percentage of imperviousness of a sub-area.

Source: Bureau of Engineering Manual Part G, Storm Drain Design.

^a To be used in computing runoff prior to development regardless of zoning classification.

Residential Planned Development – Investigate development (in field or from plans) before allocating value of I_d

G.2. SURFACE WATER QUALITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

- VIII.a): Violate any water quality standards or waste discharge requirements?
- VIII.b): Substantially deplete groundwater supplies or interfere substantially with ground water recharge such that there would be a net deficit in aquifer volume of a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- substantially alter the existing drainage pattern of the site or area, including through VIII.C): the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Place housing within a 100-year flood hazard area as mapped on a federal flood VIII.g): hazard Boundary or flood Insurance Rate Map or other flood hazard delineation map?

B. Introduction

Water quality may be impacted by pollutants discharged directly into receiving waters. Industrial flows discharged from manufacturing, cleaning, or cooling operations, and activities such as dewatering of groundwater encountered during construction can usually be directed to an outfall or pipe and are therefore categorized as "point sources."

Water quality may also be affected by pollutants found in surface water runoff originating from a wide range of dispersed sources, or "nonpoint sources." In rural settings, such as agricultural or forestland, this runoff is treated as non-point sources. In urban settings, this runoff is typically guided into a "storm drain system" and ultimately discharged to the receiving waters at a specific location(s). Hence, these storm drain system discharges are treated as point sources. Stormwater runoff is part of the natural hydrologic cycle. Drainage patterns and pollutant concentrations are frequently altered through processes such as urbanization and agriculture. Recent studies have indicated that stormwater runoff is a significant source of water pollution, which may result in declines in fisheries and other aquatic life, restrictions on recreational activities, and general

impairment of the existing and potential beneficial uses of receiving waters. "Stormwater runoff" encompasses "urban runoff," which includes the discharge of pollutants to water bodies from such non-storm (or "dry weather") related activities as irrigation, hosing sidewalks, draining swimming pools, and washing cars. Dry weather flows also include illegal discharges to the storm drain system, such as unauthorized connections, leaks, or spills.

Regulatory Framework

In 1948, Congress enacted the Water Pollution Control Act, which has since been amended significantly on several occasions, and is now commonly referred to as the Clean Water Act (CWA). The CWA delineates a national permitting system for point discharges known as the National Pollutant Discharge Elimination System (NPDES). NPDES is the basic regulatory and enforcement tool available under the CWA. NPDES permits typically incorporate specific discharge limitations for point source discharges to ensure that dischargers meet permit conditions and protect state-defined water quality standards. California is authorized to administer key components of the federal water quality management program in the state.

The existing NPDES framework was expanded in 1987 to regulate stormwater runoff (discharges) originating from municipal and industrial sources. The Los Angeles Regional Water Quality Control Board (LARWQCB) is authorized to implement a municipal stormwater-permitting program as part of its general NPDES authority, as an agent of the State Water Resources Control Board (State Board). Municipal permits typically require permittees to develop an areawide stormwater management plan, implement best management practices (BMPs) and perform stormwater monitoring. The City of Los Angeles is a co-permittee under the County of Los Angeles municipal permit.

In general, environmental impacts to surface water quality are assessed in relation to the existing characteristics of the body of water that would receive the discharge (receiving water body), including its size, flows, designated beneficial uses, and present concentrations of pollutants. Increased concentrations of toxic metals, organic compounds, suspended solids, nutrients, pathogenic microorganisms and other pollutants, or changes in temperature may result in sedimentation, eutrophication, habitat degradation, and/or threats to public health.

For point source discharges from proposed projects, the nature of the discharge is directly related to the process that produces the discharge. Nonpoint source impacts to receiving waters during project operation are related to such factors as land use type, size, design, and intensity. Construction activities may also result in the discharge of stormwater runoff pollutants, including dissolved solids, to receiving waters. If a project includes point source discharges, the

pollutants associated with the discharges may need to be identified and quantified for an NPDES permit from the LARWQCB.

Major surface water bodies in the City of Los Angeles include: the Los Angeles River, Tujunga Wash, Ballona Channel, Santa Monica Bay, and San Pedro Bay. In addition, the City is served by an extensive network of storm drains which either drain directly to the Santa Monica Bay, San Pedro Bay, or to waterways that ultimately drain to Santa Monica or San Pedro Bays.

C. Screening Criteria

Would the proposed project:

- Involve or allow an activity or process that would result in a point source discharge to a receiving water body?
- Create conditions, which may result in soil erosion, sediment runoff or nonpoint sources of contamination?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Surface Water Quality, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Surface Water Quality from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. Consider the location, size and slope of the site and the type, size, and intensity of land use(s) proposed. A receiving water body may include rivers, lakes, reservoirs, the ocean and others, as appropriate. Evaluate activities such as manufacturing, processing, cleaning, grading, cooling, dredging, dewatering of groundwater (during construction or operation), auto-related uses (e.g., parking¹, auto

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The City of Los Angeles CEQA Guidelines include a categorical exemption for surface parking lots of up to 110 spaces (equivalent to 35,310 square feet).

repair), storage of raw materials and/or finished products, use or storage of solid waste or hazardous/toxic materials, agriculture, waste water treatment operations, and landfills. Compare this information to the Screening Criteria.

DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) (see definitions below) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include a general description of the project site and adjacent areas to which runoff currently drains directly or eventually. Describe the locations of on- or off-site water bodies and existing drainage outlets (i.e., storm drains). Address the existing water quality of water bodies to which the site drains and applicable adopted water quality objectives or standards. Water quality is increasingly being addressed through watershed programs. Within the next few years TMDLs (Total Maximum Daily Loads) will be developed for local watersheds, and the impact of projects on the TMDL allocations will need to be evaluated.

Project Impacts

The CWC includes the following definitions:

"Pollution" means an alteration of the quality of the waters of the state to a degree which unreasonably affects either of the following: 1) the waters for beneficial uses or 2) facilities which serve these beneficial uses. "Pollution" may include "Contamination."

"Contamination" means an impairment of the quality of the waters of the state by waste to a degree, which creates a hazard to the public health through poisoning or through the spread of

disease. "Contamination" includes any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected.

"Nuisance" means anything which meets all of the following requirements: 1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; 2) affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; and 3) occurs during, or as a result of, the treatment or disposal of wastes.

Review the description of the proposed project, project site and surrounding area. Determine the nature, quantity, duration, and affect of project discharges. Describe any proposed treatment of the discharge. Assess the impact on the receiving water body relative to existing conditions and any applicable water quality objectives or standards. Consider factors such as the size of the site as a percentage of the entire watershed and the predominant land uses in the watershed. The percentage of imperviousness factors reproduced in Exhibit G.1-1² may be used to evaluate the relative amount of runoff from various land use types. Consult with the Bureau of Engineering, the Los Angeles County Flood Control District, the LARWQCB, the Environmental Protection Agency (EPA), or the Army Corps of Engineers (ACOE), as appropriate. A professional consultant may be required.

Cumulative Impacts

Review the description of the related projects. Identify those that are in the same watershed or that drain to the same water body as the proposed project. Evaluate the combined impact on the receiving water body of related project discharges in combination with the proposed project discharge as described for project impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Establish an erosion control plan prior to construction. Include such measures as:

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Exhibit G.1-1, Development Classifications, is found in G.1. SURFACE WATER HYDROLOGY.

- Use of natural drainage, detention ponds, sediment ponds, or infiltration pits to allow runoff to collect and seep into the ground at a rate which would reduce or prevent downhill erosion,
- Use of barriers to direct and slow the rate of runoff and to filter out large-sized sediments,
- Use of downdrains or chutes to carry runoff from the top of a slope to the bottom, and
- Control the use of water for irrigation so as to avoid off-site runoff;
- Employ permeable paving materials that permit water penetration to a soil depth of 18 inches or more, or provide a coefficient of runoff of 0.6 or less;
- Include properly designed and maintained biological oil and grease removal systems in new storm drain systems to treat water before it leaves the project site;
- Properly store hazardous materials to prevent contact with precipitation or runoff;
- Develop and maintain effective monitoring and cleanup program for spills and leaks of hazardous materials;
- Place equipment to be repaired or maintained in uncovered areas on a pad of absorbent material to contain leaks, spills, or small discharges;
- Provide periodic and consistent removal of landscape and construction debris;
- Sweep parking lots at regular, frequent intervals to remove debris. Remove any significant chemical residue left by vehicles by appropriate methods;
- Use non-toxic alternatives for such applications as insecticides, herbicides, rodenticides, and fertilizers. Apply chemical controls only when precipitation is not forecast for the area;
- Use permeable surfaces (such as grassy swales, green strips near parking areas, or porous pavement) to allow infiltration to reduce the peak flow of runoff and minimize the transport of pollutants to receiving waters;

- Install detention basins to remove suspended solids by settlement. Fit basins with trash racks at the inlets to catch floating solids; and
- Periodically monitor the water quality of runoff before discharge.

3. DATA, RESOURCES, AND REFERENCES

- For updated information about City ordinances and permit requirements for surface water runoff, contact the Bureau of Engineering, Stormwater Management Division, at 650 South Spring Street, Suite 700, Los Angeles, California 90014; Telephone: 213-847-6350.
- LARWQCB Waste Discharge Requirements, Stormwater/Urban Runoff Discharge for Los Angeles County and Co-Permittees, Water Quality Order No. 96-054, NPDES Permit No. CAS614001.

LARWQCB Water Quality Control Plan, June 13, 1994.

National Research Council, Monitoring Southern California's Coastal Waters 1990.

Santa Monica Bay Restoration Project, State of the Bay 1993, January 1994.

- State Board, General Permit for Stormwater Discharges Associated With Construction Activities, Water Quality Order No. 92-06-DWQ; General Permit No. CAS000002.
- State Board, General Permit for Stormwater Discharges Associated With Industrial Activities Excluding Construction Activities, Water Quality Order No. 91-13-DWQ (as amended by Water Quality Order No. 92-12-DWQ); General Permit No. CAS000001.

State Board, Ocean Plan, August 1995.

- State Board, Stormwater Bulletin Board Service. Monitoring data for various watersheds in California.
- State Board, Stormwater Quality Task Force, California Stormwater Best Management Practice Handbooks, March 1993. Provides general guidance in developing and implementing BMPs for stormwater quality for municipal, industrial and construction activities.

addresses the requirements of the stormwater program as developed from section 402 (p) of the CWA.

EPA, Office of Wastewater Enforcement and Compliance, Draft Stormwater Pollution Prevention for Industrial Activities, 1992.

EPA, Water Planning Division, Final Report of the Nationwide Runoff Program, December 30, 1983

Regulatory Framework

The State Board has the overall responsibility to develop and implement state water quality control policy and is the EPA-designated agency for administering applicable federal CWA programs, including adopting water quality standards for waters of the state. The California Water Code (CWC) establishes nine administrative areas in the State, which are administered by Regional Water Quality Control Boards (RWQCB), which adopt Water Quality Control Plans for their respective regions. The Water Quality Control Plans designate beneficial uses for each receiving water body and establish water quality objectives to ensure reasonable protection of the beneficial uses. The primary method of plan implementation for point discharges is through the issuance of permits.

The owner or operator of any facility discharging or proposing to discharge waste to surface waters (typically from a point source) is required to apply for an NPDES permit with the appropriate RWQCB. Effluent limits are set by the RWQCB for each potential pollutant in accordance with applicable state and federal water quality criteria for the receiving water body. Within the City, the criteria are contained in the Los Angeles Region Basin Plan. The owner or operator of any facility discharging or proposing to discharge waste that may affect groundwater quality or from which waste may be discharged in a diffused manner (e.g. erosion from soil disturbance) must first obtain Waste Discharge Requirements (WDR) from the appropriate RWQCB.

The State Board has issued two general stormwater discharge permits to cover industrial and construction activities, which are required for specific industry types based on standard industrial classification and construction activities on one acre or more or less than one acre but are part of a larger common plan of development that in total disturbs one or more acres. The RWQCB oversees implementation and enforcement of the general permits. The Bureau of Sanitation and Watershed Protection, Stormwater Management Division, are the agencies responsible for overseeing implementation of permit responsibilities for the City. Presently, under

the General Construction Stormwater Permit, projects of one acre or greater are required to incorporate, to the maximum extent possible, permanent or post-construction BMPs in project planning and design as discussed in the current permit, which was approved in December 2001.

Selected Legislation

Federal

NPDES (40 CFR Sec. 122.1)

The NPDES program requires permits for the discharge of pollutants from any point source into waters of the United States. These point sources include: concentrated animal feeding operations, concentrated aquatic animal production facilities, discharges into aquaculture projects, and discharges of stormwater.

Federal Water Pollution Control Act (Clean Water Act - CWA) (33 U.S.C. 1251)

Clean Water Act Amendments of 1972, PL 92-500

Clean Water Act Amendments of 1977, PL 95-217

Clean Water Act Amendments of 1987, PL 100-4

The objective of the CWA is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters.

State

CWC, Division 7 Water Quality

This division of the Code addresses: the conservation, control and utilization of water resources; water quality; and charges the state and regional water boards with coordination and control of water quality. Section 13050 defines pollution, contamination and nuisance, as well as other terms used in the water code.

G.3. GROUNDWATER LEVEL

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- VIII.b): Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- Would the project otherwise substantially degrade water quality? VIII.f):
- VIII.g): Would the project place housing within a 100-year flood hazard area as mapped on a federal flood hazard Boundary or flood Insurance Rate Map or other flood hazard delineation map?
- Would the project expose people or structures to a significant risk of loss, injury or VIII.i): death involving flooding, including flooding as a result of the failure of a levee or
- VIII.j): Would the project inundation by seiche, tsunami, or mudflow?

B. Introduction

The City of Los Angeles overlies eight groundwater basins as identified in the Los Angeles Region Water Quality Control Plan, adopted by the Los Angeles Regional Water Quality Control Board (LARWQCB), and designated by the California Department of Water Resources (DWR). The Los Angeles Coastal Plain includes the West Coast Basin, the Central Basin, the Santa Monica Basin, and the Hollywood Basin. The San Fernando Valley overlies the San Fernando Basin and portions of the Eagle Rock, Verdugo, and Sylmar Basins. These groundwater basins are depicted in Exhibits G.3-1 and G.3-2. The Los Angeles Region Water Quality Control Plan identifies several beneficial uses common to all of these basins including municipal and domestic supply, industrial process and industrial service supply, and agricultural supply.

Groundwater is a major component of the water supply for many public water suppliers in the Los Angeles metropolitan area, and is also used by private industries, as well as a limited number of

private agricultural and domestic users. Local groundwater provides approximately 15 percent of the total water supply of the City of Los Angeles. The Los Angeles Department of Water and Power (DWP) owns and operates these wells and can act as lead agency under CEQA for projects involving wells and water production facilities. Production rights are adjudicated in three of the four major groundwater basins (West Coast, Central, and San Fernando Basins), and are monitored and controlled by a Watermaster. The DWP serves as the Watermaster for the San Fernando Basin. Production rights are not adjudicated in the Santa Monica and Hollywood basins.

Each groundwater basin is replenished by deep percolation of precipitation and return water from irrigation. Individual basins may also be replenished by surface spreading of local runoff, imported water and reclaimed water; injection of imported water (for protection against saline intrusion); and subsurface inflow from other basins. The major spreading areas are generally on the higher portions of the valley floor near the mountain front, or along major streams or channels.

Water table changes and/or changing the direction of flow may result from extracting groundwater for water supply needs or site dewatering, increasing or decreasing groundwater recharge, intercepting and removing groundwater from cuts or excavations, or remediation of contaminated groundwater. Earthwork cuts or excavations in areas of shallow groundwater may necessitate the use of temporary or permanent removal of groundwater by dewatering systems. Groundwater recharge may be reduced if an area currently available for spreading of stream runoff is reduced, if permeable streambeds are lined, or if permeable areas located above groundwater basins are replaced by hard surfaces (paving, buildings, etc.). Groundwater recharge may be increased if larger permeable areas are created.

Possible impacts resulting from lowering the water table include changes in the production of nearby existing wells, reduced basin yield, salt water intrusion (see G.4, GROUNDWATER QUALITY), subsidence (see E.1., GEOLOGIC HAZARDS), stream flow reduction (see G.1., SURFACE WATER HYDROLOGY), impacts to vegetation, and changes in the direction and rate of travel of existing contaminants in the groundwater. Possible impacts of raising the water table include seepage or other impacts on below ground structures, structural damage from settling or expansion of clay soils (see E.1., GEOLOGIC HAZARDS), and changes in the direction and rate of flow of contaminants including saltwater intrusion (see G.4. GROUNDWATER QUALITY).

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Permanent removal of groundwater allocated to DWP requires an agreement with DWP.

C. Screening Criteria

- Does the project include the installation of production water wells or a permanent groundwater extraction or dewatering system in a groundwater basin used for potable water supply purposes?
- Does the project include planned groundwater recharge through surface spreading or injection?
- Would the project involve cuts or excavation that would intercept an aquifer?
- Would the project reduce permeable areas overlying a spreading ground used for groundwater recharge?
- Would the run-off factor for the developed project site exceed the percentage of imperviousness for the existing land use category, as contained in Part G of the Bureau of Engineering Manual, Storm Drain Design²?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Groundwater Level, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to each of the preceding questions indicates that there would normally be no significant impact from the proposed project on Groundwater Level.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site and surrounding area. Locate any underlying groundwater basins, aquifers, and spreading grounds. Review Exhibits G.3-1 and G.3-2, and the Environmental and Public Facilities Map, Groundwater Basins and Groundwater Contamination Areas, as necessary. Identify any proposed water wells, recharge activities, permanent groundwater extraction or dewatering systems, or any proposed cuts or excavations that may intercept an aquifer. Evaluate whether there would be a reduction in permeable areas overlying a spreading ground used for groundwater recharge. Determine the percentage of imperviousness and review Exhibit G.1-1.² Compare this information with the Screening Criteria.

Percentage of imperviousness factors from the Bureau of Engineering Manual are reprinted in G.1. SURFACE WATER HYDROLOGY in Exhibit G.1-1.

DETERMINATION OF SIGNIFICANCE 2.

Significance Threshold

A project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
 - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought;
 - Reduce yields of adjacent wells or well fields (public or private); or
 - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction of groundwater recharge capacity.

Methodology to Determine Significance В.

Environmental Setting

In a description of the environmental setting, include the following information:

- Identification and description of the underlying groundwater basin(s), including the level, quality, direction of flow, and existing uses of the water;
- Location, existing uses, production capacity, quality, and other pertinent data for spreading grounds and potable water wells in the vicinity (usually within a one mile radius);
- Area and degree of permeability of soils on site; and
- Ongoing or planned groundwater remediation activities.

Project Impacts

Review the description of the proposed project and the information from the Evaluation of Screening Criteria.

Determine which activities could impact the groundwater resources by considering the following factors:

- The rate, duration, location and quantity of extraction, dewatering, spreading, injection, or other activities;
- The projected reduction in groundwater resources and any existing wells in the vicinity (usually within a one mile radius); and
- The projected change in local or regional groundwater flow patterns.

For subsurface cuts and excavation that intercept an aquifer, determine the projected change in localized flow and the quantities of potable groundwater that would require removal, if any. Note impacts to structures from seepage or other potential conditions and determine whether groundwater removals would be temporary or permanent.

If there is a projected loss of a large permeable area, including permeable streambeds, which historically allowed water to percolate, address the following:

- The total amount of permeable area that would be covered or lost;
- The average reduction in volume of recharge water due to project implementation (short-term and long-term, if applicable); and
- The lost recharge potential as compared to the adjudicated or estimated safe yield of the underlying groundwater basin.

Consult with local and regional water agencies and utilities, as needed.

Cumulative Impacts

Review the list of related projects and identify those located over the same groundwater basin or near the same recharge area or well(s) as the proposed project that could change potable water levels or reduce groundwater recharge capacity. Analyze the potential combined effects of the related projects with the proposed project, using the method described in Project Impacts.

Sample Mitigation Measures

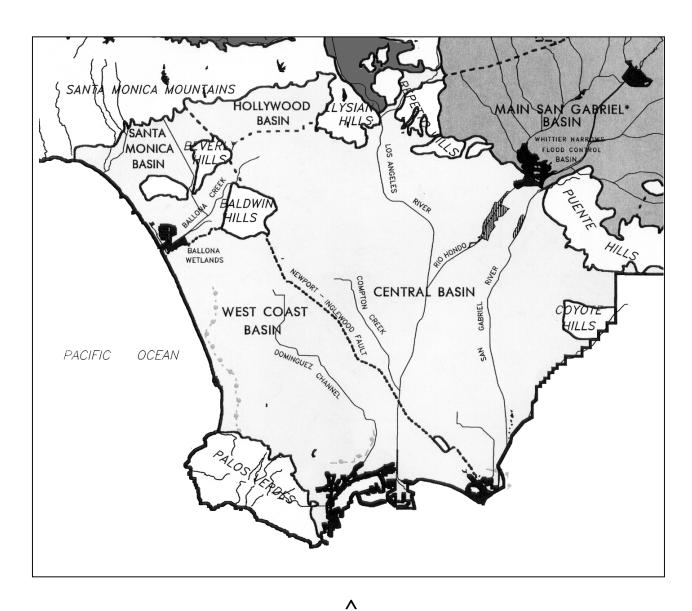
Potential mitigation measures include the following:

- Relocate proposed wells;
- Compensate existing, adjacent well owners who would be affected by the proposed project;
- Reduce proposed impermeable areas that would result in loss of recharge capacity;
- Construct replacement recharge capacity at an alternative location in the same basin;
- Avoid areas of shallow groundwater when locating roadways, underground trenches, and buildings requiring subsurface foundations; and
- If use of areas with shallow groundwater is deemed unavoidable, develop a dewatering plan, subject to review and approval of the City. The plan may include such measures as:
 - Modify the structural design of the project so that a permanent dewatering system is not needed, where feasible;
 - Removal of all standing water from excavations during construction;
 - Installation of subsurface drains;
 - Construction of retaining walls to carry water collecting behind the wall to a controlled drainage system;

- > Sealing bedrock fractures; or
- Returning the water to the groundwater basin by injection well, where feasible.

3. DATA, RESOURCES, AND REFERENCES

- LADWP/Upper Los Angeles River Area (ULARA) Watermaster, 111 North Hope Street, Los Angeles, California 90012-2694; Telephone: (213) 367-0896.
- Adjudication Documentation, Report of Referee, Superior Court, Los Angeles County No. 650079, July 1992. A thorough description of the groundwater resources of the San Fernando Valley area.
- DWR, Annual Watermaster Reports, published for the Central Basin, West Coast Basin, and Upper Los Angeles River Basin (covering the San Fernando Basin).
- DWR Bulletin 104: Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County, June 1991. The most comprehensive study of the area resources for the Coastal Plain Basins.
- City Planning Department, Environmental and Public Facilities Maps (1996): Groundwater Basins and Groundwater Contamination Areas.
- LARWQCB, Water Quality Control Plan, June 13, 1994.

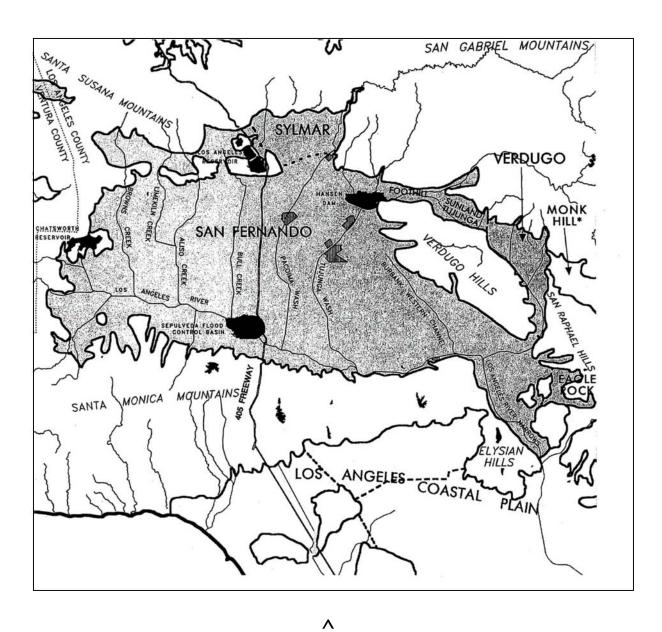


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Exhibit G. 3-1 **Los Angeles Basin**

Regional Boundary
Streams

^{*} The main San Gabriel is a part of the San Gabriel groundwater basins



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Exhibit G. 3-2 **San Fernando Basin**

 Regional Boundary
 Streams
 County Line

G.4. GROUNDWATER QUALITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

VIII.ga): Would the project place housing within a 100-year flood hazard area as mapped on a federal flood hazard Boundary or flood Insurance Rate Map or other flood hazard delineation map?

VIII.h): Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

B. Introduction

The City of Los Angeles overlies eight groundwater basins, as identified in the Los Angeles Region Water Quality Control Plan, adopted by the Los Angeles Region Water Quality Control Board (LARWQCB) and designated by the California Department of Water Resources (DWR). The Los Angeles Coastal Plain includes the West Coast Basin, the Central Basin, the Santa Monica Basin and the Hollywood Basin. The San Fernando Valley overlies the San Fernando Basin, and portions of the Eagle Rock, Verdugo and Sylmar Basins. These groundwater basins are depicted in Exhibits G.3-1 and G.3-2¹.

The Los Angeles Region Water Quality Control Plan identifies a number of beneficial uses common to all of these basins, including municipal and domestic supply, industrial process and industrial service supply, and agricultural supply. It also establishes water quality objectives for a number of constituents of each groundwater basin to protect these uses, identifies existing water quality problems in general terms, and sets forth an implementation plan to maintain or improve groundwater quality to allow the objectives to be met.

Historically, the groundwater basins have become contaminated as a result of human activities and natural phenomena. Contamination can result from spills, leaks, leachate, or discharges of contaminants; returns from agricultural or urban irrigation; salt-water intrusion; septic system and wastewater discharges; and other sources. Areas of contaminated groundwater are relatively well

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¹ See G.3. GROUNDWATER LEVEL.

documented in the Los Angeles area by several agencies that regulate, use or manage groundwater supplies, including the LARWQCB. The Environmental and Public Facilities Map, Groundwater Basins and Groundwater Contamination Areas, indicates major known areas of contamination underlying the City.

Degradation of groundwater quality may result from a variety of activities, including: the discharge or application of wastewater, groundwater, or solid waste to the land surface or subsurface areas; groundwater injections or withdrawals, or other activities that could result in a change in the flow direction of existing plumes of groundwater contamination or saltwater intrusion; drilling that intercepts areas of groundwater contamination; leaking underground or above-ground storage tanks; or accidental spills or releases or other hazardous materials on permeable soils. (See also G.3. GROUNDWATER LEVEL.)

Responsibility for implementation of the Water Quality Control Plan to protect groundwater quality rests with the LARWQCB. A primary mechanism of implementation used by the LARWQCB is the issuance and enforcement of permits (Waste Discharge Requirements, or WDRs) for discharge of any wastewater, groundwater, or contaminants to the ground surface or subsurface. Discharges that require WDRs include, but are not limited to: septic systems, dewatering systems, holding/equalization tanks, evaporation ponds, percolation ponds and leachfields, landfills, land treatment units (bioremediation), oil field brine disposal and land disposal of wastes. Additionally, the LARWQCB, California Department of Toxic Substances Control (DTSC), and the Environmental Protection Agency (EPA) can investigate, regulate, and remediate groundwater contamination (e.g. Superfund projects).

C. Screening Criteria

- Would the project include the installation or operation of water wells,² or any groundwater extraction or recharge system, that is in the vicinity (usually within one mile) of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility?
- Would the project include surface or subsurface application or introduction of potential contaminants or waste materials during construction or operation? Examples of such projects include: on-site disposal systems (septic systems), holding/equalization tanks, evaporation ponds, underground or above-ground storage tanks, percolation ponds and

² Other than monitoring wells and wells intended to remediate existing, or prevent future, groundwater contamination or saltwater intrusion.

- leachfields, landfills and other land surface waste disposal facilities, land treatment units (bioremediation), oil field brine disposal, and agricultural activities.
- Could the project result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation?
- Would the project involve drilling to or through a clean or contaminated aquifer?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Groundwater Quality, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Groundwater Quality from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project site, construction and operational activities and the relationship of the site to underlying groundwater basins. Review Exhibits G.3-1 and G.3-2,³ and the Environmental and Public Facilities Map, Groundwater Basins and Groundwater Contamination Areas, or other relevant maps, reports, and studies to identify groundwater recharge areas, spreading grounds, aquifers, or known areas of contamination. Identify any proposed installation or operation of water wells; groundwater extraction or recharge systems; direct or indirect introduction of contaminants; or drilling to or through an aquifer. Compare this information to the Screening Criteria.

The LARWQCB is a primary source of information regarding existing water quality problems. In addition, water utilities and the Watermaster of each adjudicated groundwater basin may be contacted for information regarding water rights, hydrologic features and groundwater contamination.

³ See G.3. GROUNDWATER LEVEL.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

A project would normally result in a significant impact on groundwater quality if it would:

- Affect the rate or change the direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Identification and description of the underlying groundwater basin(s), recharge areas, spreading grounds, aquifers and wells. Include the quality, quantity and use of the water;
- Area and degree of permeability of soils on the project site and in areas where operations could involve surface discharges;
- The location and nature of any existing groundwater contamination in the vicinity of the project site (usually within a one-mile radius), including saltwater intrusion and leaking underground storage tanks (available from the local fire department, the County Health Department, or the State Leaking Underground Storage Tanks (LUST) database);
- Description of any ongoing or planned remediation activities; and
- Existing groundwater levels and direction of flow in the vicinity of the project.

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Project Impacts

Using the information from the Evaluation of Screening Criteria, describe proposed construction and operational features of the project that involve any intrusion into groundwater, including extraction, dewatering, planned surface application, subsurface disposal, percolation, or injection of potential contaminants or waste materials. Consider the characteristics of the material proposed for application or injection; any pre-treatment; methods of application, injection; etc. Analyze any potential changes in the amount of groundwater contamination (e.g., concentration, levels or area involved) or the rate and direction of flow of existing groundwater contamination due to project-related activities. Also, determine the impact on the water quality of existing production wells and the size of the contaminated area.

Cumulative Impacts

Review the list of related projects and identify those located over the same groundwater basin or in the vicinity of the same area of known groundwater contamination, or seawater intrusion, municipal supply well, spreading ground facility or the coast that could increase groundwater contamination. Analyze the potential combined effect of the related projects with the project using the methods described in Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Modification to reduce or eliminate the discharge or contamination;
- Reduction or modification of planned groundwater extraction; and
- Treatment of extracted contaminated water.

3. DATA, RESOURCES, AND REFERENCES

- Los Angeles Department of Water and Power (DWP)/Upper Los Angeles River Area (ULARA), 111 North Hope Street, Los Angeles, California 90012; Telephone: (213) 367-0906. Annual ULARA Watermaster Report describes water rights, and general hydrologic features for the San Fernando, Sylmar, Eagle Rock and Verdugo Basins, and groundwater contamination.
- Los Angeles Fire Department (LAFD) Records of known leaking underground storage tanks and other information on the location and use of hazardous materials.
- LARWQCB, 320 West 4th Street, Suite 200, Los Angeles, California 90013; Telephone: (213) 576-6600.
- City Planning Department, Environmental and Public Facilities Maps (1996): Groundwater Basins and Groundwater Contamination Areas.
- LARWQCB Remedial Investigation of Groundwater Contamination in the San Fernando Valley, December 1991, which describes the nature and extent of groundwater contamination in the San Fernando, Sylmar, Verdugo and Eagle Rock basins. Also provides geologic and hydrogeologic characterizations for each basin.
- LARWQCB, Los Angeles Region Water Quality Control Plan, 1994, which describes groundwater basins, beneficial uses, water quality objectives, and the implementation plan to protect water quality objectives and beneficial uses.
- Safe Drinking Water Act of 1974, PL 93-523; Safe Drinking Water Act of 1986, PL 99-339, which establishes a federal program to monitor and increase the safety of all commercially and publicly supplied drinking water.

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H. LAND USE

City of Los Angeles L.A. CEQA Thresholds Guide

H.1. LAND USE CONSISTENCY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

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

IX.c): Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

B. Introduction

This section addresses the consistency or compliance of proposed projects with the goals and policies of the General Plan and its elements, including the Framework Element, 35 adopted Community Plans, as well as the Planning and Zoning Code, and any applicable specific plans, interim control ordinances (ICOs), community design overlay districts (CDOs), local coastal plans and redevelopment plans. City and regional utility plans and other adopted plans that contain environmental policies related to the physical environment that are applicable to the project activities and/or site may also be relevant.

C. Screening Criteria

- Is the project inconsistent with the General Plan or its elements, or an applicable specific plan, local coastal plan, redevelopment plan, interim control ordinance or adopted environmental goals or policies?
- Would the project require a General Plan amendment or zone change?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the

¹ Chapter 1 of the Los Angeles Municipal Code (LAMC).

Significance Threshold for Land Use Consistency, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Land Use Consistency from the proposed project.

D. Evaluation of Screening Criteria

Review the proposed project for consistency with the General Plan and other adopted environmental goals and policies. Potential areas of inconsistency include, but are not limited to: land use type; height, bulk, design or density; waste or wastewater generation; resource consumption or degradation; and other plan policies that relate to the physical environment. Use the most recent Community Plan maps and Zone Information & Map Access System (ZIMAS) http://zimas.lacity.org/ to assist in identifying ordinances and plan areas that may pertain to the project site, or consult the Community Planning Bureau of the City Planning Department. As appropriate, evaluate the General Plan and its elements (including the Framework Element), Community Plans, specific plans, ICOs, CDO's, local coastal plans, redevelopment plans, Planning & Zoning Code, utility plans, and resource management plans. Identify and assess the project's consistency with applicable habitat conservation plans or natural community conservation plans. Consider whether policies are mandatory or guidance, and which is the agency with primary jurisdiction. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Community Plan land use and density designation;

- Zoning designation and other Planning and Zoning Code land use regulations relevant to the project site;
- Adopted ICOs, specific plan, redevelopment plan, CDO's local coastal plan or provisions of the Coastal Act, if any, applicable to the project site;
- Other City land use policies, such as the General Plan and Elements, including the Framework Element, Airport Hazard Zone Regulations, etc., if applicable to the project site; and
- Adopted City environmental policies, ordinances and plans, such as the City Solid Waste Management Policy Plan (CiSWMPP), Source Reduction and Recycling Element (SRRE), utility and resource conservation plans or programs, wastewater policies, Clean Air Program (CAP), etc., if any, applicable to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria, evaluate the project for consistency with detailed local standards and requirements as well as with the broader context of the General Plan and its elements, environmental plans and policies, and regional utility/environmental plans. Identify project elements that conflict with the plans or policies and whether the conflict(s) would result in the project being inconsistent with the land use designation and/or environmental goals and policies of the City. Consider whether the project includes a proposed General Plan (land use) amendment and/or zone change, and whether all elements of the inconsistency have been addressed (i.e., density, design, etc.). For conflicts with environmental goals and policies, consider whether the project would interfere with the City's efforts to meet such goals, or be inconsistent with adopted policies.

Cumulative Impacts

Identify related projects in the vicinity of the proposed project and evaluate them in the same manner as the proposed project to determine if, when viewed together with the proposed project, conformance with the General Plan or other adopted plans or environmental policies would be significantly affected. Consider whether the combination of projects would conflict with the planned land uses and densities in the General Plan, or would interfere with adopted environmental goals and plans. Plans with a broad, regional perspective may be more applicable or useful in evaluating cumulative impacts because the goals and objectives of these plans may be implemented by comprehensive measures taken by government agencies.

Sample Mitigation Measures

Generally, a project determined to be inconsistent with the General Plan will require, as a condition of approval, a General Plan amendment or zone change to eliminate the inconsistency. This requires a finding that the requested change would not substantially alter the City's goals for the affected community. To mitigate an inconsistency prior to this determination, consider the following:

- Modify the project's proposed land uses to be consistent with designated land uses, zoning and/or General Plan and its element(s); or
- Relocate proposed structures or reduce the project's density/intensity to reduce conflicts or inconsistencies with the Land Use Element and plans.

3. DATA, RESOURCES, AND REFERENCES

The following references are available from the City Planning Department, Community Planning Bureau, 200 N. Spring St., 6th Floor, Los Angeles, California 90012. The Bureau may be reached at (213) 978-3893:

- General Plan and its elements, including the Framework Element and the 35 adopted Community Plans;
- District Zoning maps;
- ICOs;
- CDOs:
- Specific plans;
- Local coastal plans; and
- Airport Hazard Zone maps.

Planning and Zoning Code, (Chapter 1 of the LAMC) is available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255. For further information, call (213) 978-1310

Zone Information & Map Access System (ZIMAS) available online at: http://zimas.lacity.org.

Redevelopment plans are available from the Community Redevelopment Agency (CRA) of the City of Los Angeles, 354 South Spring Street, Suite 800, Los Angeles, California 90013; Telephone: (213) 977-1600.

City utility plans are available from the following City departments:

Department of Water and Power

- Utility Plans/Power Division 111 North Hope Street, Room 1121 Los Angeles, California 90012

Telephone: (213) 367-0285

 Urban Water Management Plan Division of Public Affairs Telephone: (213) 367-1361

Department of Public Works Bureau of Sanitation

- Wastewater plans

Wastewater Engineering Service Division

Telephone: (323) 342-6235

- Hyperion System

Hyperion Treatment Plant Telephone: (310) 648-5000

CiSWMPP and SRRE are available from the Solid Resources Citywide Recycling Division of the Bureau of Sanitation, 433 South Spring Street, 5th Floor, Los Angeles, California 90013; Telephone: (213) 473-8228.

Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for the region and offers resources and assistance. SCAG is located at 818 West Seventh Street, 12th Floor, Los Angeles, California 90017; Telephone: (213) 236-1800.

California Department of Fish and Game, South Coast Region, 4949 Viewridge Avenue, San Diego, CA 92123-1662; Telephone: (858) 467-4201.

H.2. LAND USE COMPATIBILITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

Would the project physically divide an established community? IX.a):

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

Would the project conflict with any applicable habitat conservation plan or natural IX.c): community conservation plan?

B. Introduction

This section addresses the potential for projects or programs to create situations of incompatibility between land uses or activities. Such incompatibility may result from environmental impacts associated with the proposed land use. Examples of incompatibility include land uses, which create noise, odor, safety hazards, visual, or other environmental impacts which conflict with surrounding land uses and the activities and conditions typically associated with those land uses. In addition, a project may disrupt the physical arrangement of an established community by introducing new infrastructure or isolating land uses that could interrupt the typical activities or change the land use conditions in a community.

C. Screening Criteria

- Would the project include a land use type that is incompatible with existing or proposed adjacent land uses (due to size, intensity, density or type of use)?
- Would the project include features such as a highway, aboveground infrastructure, or an easement through an established neighborhood community that could cause a permanent disruption in the physical arrangement of that established community or otherwise isolate an existing land use?

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Would the project result in a "spot" zone?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Land Use Compatibility and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Land Use Compatibility impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, including the proposed land use or activity, and the size, density and intensity of the operation. Noise, odor, signage, safety hazards, traffic or other impacts may indicate an incompatibility with existing adjacent or surrounding land uses or current zoning for those sites, if vacant. Also, consider the types of land uses surrounding the project and the typical activities that occur at these sites, compared to those that would occur at the proposed project. Indicate the presence or lack of buffers between the project and adjacent land uses of other types. Note that a zone change required to implement the project may indicate a potential incompatibility with adjacent existing land uses. Review specific plans for urban design compatibility programs or regulations and their relevance to project design.

If the project includes elements such as a highway, aboveground infrastructure or an easement, identify the existing land uses that would be removed or would be adjacent to the new infrastructure. Determine the duration of any disruption of the physical arrangement of an established neighborhood or community. Such impacts may result from a physical separation or the creation of barriers that would disrupt the social or physical interaction between established land uses that comprise a neighborhood or community.

A "spot" zone occurs when the zoning or land use designation for only a portion of a block changes, or a single zone or land use designation becomes surrounded by more or less intensive land uses.

Compare this information to the Screening Criteria.

DETERMINATION OF SIGNIFICANCE 2.

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Methodology to Determine Significance В.

Environmental Setting

In a description of the environmental setting, describe and map, as appropriate, the existing land uses and current zoning of the project site and the properties in the immediate vicinity of the proposed project. Also, identify uses near the site such as schools, libraries and residences which may be particularly sensitive to potential nuisance impacts (e.g., noise, odor, safety hazards) associated with the proposed project.

If the proposed project may disrupt or divide an established community, evaluate the existing neighborhoods or communities immediately surrounding the project. Address the type of land uses in the area, and the location of residences, businesses, schools, and other community facilities in relation to the proposed project and supporting residences.

Project Impacts

A significant land use compatibility impact may be indicated by the presence of one or more significant project impacts, which suggest that the location or intensity of the proposed project could conflict with existing uses. However, the presence of project impacts does not automatically indicate a land use compatibility impact and the effect of these impacts should be evaluated within the primary impact category (e.g., noise, traffic).

Evaluate the nature, extent and number of secondary impacts to determine the extent of any conflict between the project and existing uses in the area. Consider the type of activities typically expected to occur at land uses adjacent to the project and whether nuisance impacts from the proposed project would conflict with these activities.

If the proposed project would add such features as a highway, aboveground infrastructure or easement, determine the extent to which existing neighborhoods or communities would be impacted by its implementation. Evaluate the extent of the physical separation, barrier or other disruption of existing land uses or activities that could result from the proposed project. Indicate the duration of the disruption (e.g., long-term, permanent) of the physical or social interaction between land uses that comprise an established neighborhood or community.

Cumulative Impacts

The cumulative impact assessment should identify other known projects or land use changes proposed in the vicinity of the project that may either combine with the proposed project to create a land use incompatibility with the existing land uses, or be subject to nuisance impacts resulting from a proposed project that creates a land use incompatibility with the related projects. Evaluate the potential impacts using the methodology described above.

Sample Mitigation Measures

Mitigation measures to reduce secondary impacts are found in the individual sections (noise, traffic, etc.). Potential mitigation measures that may reduce land use compatibility impacts include:

- Change the project design, configuration, visual screening, setbacks, building heights, etc., to be compatible with surrounding uses;
- Restrict certain operational characteristics of the proposed use to reduce or eliminate impacts, such as limiting hours of operation or placing restrictions on specific types of uses or activities proposed for the project, etc.;
- Provide enclosed structures around certain activities that normally occur outdoors;
- Place aboveground infrastructure under ground, or grade separate key portions of the proposed highway, rail line, or other infrastructure to minimize physical separations;

- Provide pedestrian and bicycle routes or crossings to increase mobility; and
- Provide a buffer (such as a decorative wall or landscaping) where residential uses are adjacent to non-residential uses.

3. DATA, RESOURCES, AND REFERENCES

City Planning Department, 201 North Figueroa Street, 3rd Floor, Los Angeles, California 90012; Telephone: (213) 977-6083. For plan check, first go to Counter A, 4th floor (Building and Safety). They will refer visitors to the Planning Department as appropriate.

See also H.1. LAND USE CONSISTENCY.

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I. NOISE

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I.1. CONSTRUCTION NOISE

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XI.a): Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- XI.b): Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- XI.d): Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- XI.e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- XI.f): For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

B. Introduction

Construction of facilities and structures requires the use of equipment, which may generate high noise levels and adversely affect noise sensitive uses. In assessing the impact of construction noise upon the environment, the nature and level of activities that generate the noise, the pathway through which the noise travels, the sensitivity of the receptor, and the period of exposure are all considered.

Environmental noise is measured in decibels (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale (dBA) was devised. Because the human ear is less sensitive to low frequency sounds, the A-scale deemphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are represented by dBA. On this scale, the range of human

For impacts during operation, see I.2 OPERATIONAL NOISE, I.3. RAILROAD NOISE, and I.4. AIRPORT NOISE, as appropriate.

hearing extends from about 3 dBA to about 140 dBA. A 10-dBA increase is judged by most people as a doubling of the sound level.

To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. The Community Noise Equivalent Level (CNEL) represents an energy average of the A-weighted noise levels over a 24-hour period with 5 dBA and 10 dBA increases added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. to 7:00 a.m., respectively. The increases were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day.

Typical construction equipment types are presented in Exhibit I.1-1. Noise levels from these equipment types ranges from 76 to 91 dBA for equipment powered by internal combustion engines, saws, and vibrators and from the mid-80s to more than 100 dBA for impact equipment. Exhibit I.1-2 provides typical noise levels for each construction phase. The excavation and finishing phases include the noisiest construction activities.

The Environmental Protection Agency (EPA), establishes emission standards for construction equipment according to the provisions of the Noise Control Act of 1972, set forth in 40 CFR, Part 204. In addition, the City of Los Angeles Noise Ordinance addresses noise generated at construction sites, including permissible hours of construction, increases in ambient noise levels, and the technical feasibility of reducing noise from certain construction equipment. The Los Angeles Police Department (LAPD) enforces the provisions of the Noise Ordinance.²

C. Screening Criteria

- Would construction activities occur within 500 feet of a noise sensitive use?
- For projects located within the City of Los Angeles, would construction occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at anytime on Sunday?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer

Refer to Sections 41.40, 112.02, and 112.05 of the Los Angeles Municipal Code (LAMC). Technical infeasibility means that specified noise limitations cannot be achieved despite the use of mufflers, shields, sound barriers and/or any other noise reduction devices or techniques during operation of the equipment.

to the Significance Threshold for Construction Noise and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact from the proposed project.

Evaluation of Screening Criteria D.

Review the description of the proposed project, including information on construction activities. Consult a map showing the location of noise sensitive uses within 500 feet of the project site. Noise sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Determine whether construction activities would occur within 500 feet of a noise sensitive use or during the hours specified in the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

Α. **Significance Threshold**

A project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at anytime on Sunday.

B. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Identification of noise sensitive land uses within 500 feet of the project site, including description, location, and distance from the project; and
- Quantification of ambient noise levels (existing and projected at the time of construction) measured in CNEL.

One of the following methodologies can be used to determine ambient noise levels:

- Field measurements involving the use of a noise meter at and surrounding the project site:
- "Presumed Ambient Noise Levels," as set forth in the LAMC, Section 111.03 (see Exhibit I.1-3); or
- A noise monitoring program performed according to the procedures set forth in the LAMC, Sections 111.02 and 112.05. This involves taking measurements at selected locations to establish ambient background noise levels.

Project Impacts

Review the description of the proposed project, including the duration of construction activities. Identify the type, amount, and scheduling of construction equipment to be used during each construction phase, and the distance from construction activities to noise sensitive uses.

Calculate the noise emissions from individual equipment by using the noise levels shown in Exhibits I.1-1 and I.1-2, or other applicable references, the distance to the noise sensitive uses, and noise attenuation standards. Noise models may be used, as appropriate. Noise levels 50 feet from a source decrease by approximately 3 dBA over a hard, unobstructed surface, such as asphalt, and by approximately 4.5 dBA over a soft surface, such as vegetation. For every doubling of distance thereafter, noise levels drop another 3 dBA over a hard surface and 4.5 dBA over a soft surface. Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of emissions as that shown in Exhibit I.1-1.

Determine the combined noise levels from equipment that will be operated simultaneously. Noise levels measured in decibels increase logarithmically and cannot be added arithmetically. When transmission path topography between the construction noise source and the receptor location is complex, consult an experienced noise specialist, as necessary.

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Establish the change in noise level from construction activities at the location of sensitive receptors. Subtract the projected noise level without construction equipment from the projected noise level during construction activities. Considering the number of days various noise levels are projected, determine whether construction activities would exceed both the number of days, times of day, and dBA increases in the Significance Threshold.

Cumulative Impacts

As feasible, identify construction activities for related projects that would coincide with the project's construction operations. Calculate noise levels using the methodology in Project Impacts and logarithmically add the noise from these construction activities to the project-related construction noise to determine the cumulative effect of the construction activities. Consult a noise specialist, or use a noise model, as needed.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Stage construction operations as far from noise sensitive uses as possible;
- Avoid residential areas when planning haul truck routes;
- Maintain all sound-reducing devices and restrictions throughout the construction period;
- Replace noisy equipment with quieter equipment (for example, a vibratory pile driver instead of a conventional pile driver and rubber-tired equipment rather than track equipment); and
- Change the timing and/or sequence of the noisiest construction operations to avoid sensitive times of the day.

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3. DATA, RESOURCES, AND REFERENCES

- Noise Ordinance No. 161,574, LAMC Section 112.05 and No. 166,170, LAMC Section 41.40 provide construction hours and construction equipment noise thresholds.
- Noise Ordinance No. 156,363, LAMC Section 111.02 provides sound level measurement procedures.
- Noise Ordinance No. 156,363, LAMC Section 111.03 provides ambient noise levels.
- Los Angeles Association of Environmental Professionals (AEP), Thresholds of Significance, Construction noise threshold used by Port of Long Beach, 1992.
- EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, Prepared by Bolt, Beranek and Newman, 1971.

Categories of Construction Equipment

- 1. Impact equipment and tools: This group includes pile drivers, pavement breakers, tampers, rock drills, and small; hand-held pneumatically, hydraulically, or electrically powered tools. In the case of conventional pile drivers, whether steam-powered or diesel-powered, the impact of the hammer dropping onto the pile is the dominant noise-generating component. However, sonic or vibratory pile drivers do not produce impact noise as it vibrates the pile at resonance, rather than using a drop hammer.
- 2. Equipment powered by internal combustion engines: The internal combustion engine, usually of the diesel type, is used to provide motive and/or operating power. Engine powered equipment can be divided into categories according to its mobility and operating characteristics as earthmoving equipment (highly mobile), materials handling equipment (semi-mobile), and stationary equipment.
- 3. Other equipment: Certain types of construction equipment, such as power saws or concrete vibrators do not fall under either of the two categories above.

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Selected Legislation

Federal

Federal Noise Control Act of 1972 (40 CFR Sec. 204)

Public Law 92-574. Regulates noise emissions from operation of all construction equipment and facilities; establishes noise emission standards for construction equipment and other categories of equipment; and provides standards for the testing, inspection, and monitoring of such equipment. Gives states and municipalities primary responsibility for noise control.

State

California Noise Control Act of 1973 (Health and Safety Code, Division 28)

Declares that excessive noise is a serious hazard to the public health and welfare; establishes the Office of Noise Control with the responsibility to set standards for noise exposure in cooperation with local governments or the state legislature.

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Exhibit I.1-1
NOISE LEVEL RANGES OF TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Levels in dBA at 50 feet ^a	
Front Loader	73-86	
Trucks	82-95	
Cranes (moveable)	75-88	
Cranes (derrick)	86-89	
Vibrator	68-82	
Saws	72-82	
Pneumatic Impact Equipment	83-88	
Jackhammers	81-98	
Pumps	68-72	
Generators	71-83	
Compressors	75-87	
Concrete Mixers	75-88	
Concrete Pumps	81-85	
Back Hoe	73-95	
Pile Driving (peaks)	95-107	
Tractor	77-98	
Scraper/Grader	80-93	
Paver	85-88	

Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of emissions as that shown in this table.

Source: EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Exhibit I.1-2 OUTDOOR CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level (dBA Leq)		
	Noise Levels at 50 feet		
	50 feet	with Mufflers (dBA)	
Ground Clearing	84	82	
Excavation, Grading	89	86	
Foundations	78	77	
Structural	85	83	
Finishing	89	86	

Source: EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Exhibit I.1-3
PRESUMED AMBIENT NOISE LEVELS (dBA)

Zone		Day	Night
Residential:	A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, R5	50	40
Commercial:	P, PB, CR, C1, C1.5, C2, C4, C5, CM	60	55
Manufacturing:	M1, MR1, MR2	60	55
Heavy Manufacturing:	M2, M3	65	65

Source: LAMC, Section 111.03.

I.2. OPERATIONAL NOISE

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XI.a): Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- XI.b): Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- XI.c): Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- XI.d): A substantial temporary or periodic increase in ambient noise levels in the project vicinity above the existing without the project?
- XI.e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- XI.f): For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

B. Introduction

Stationary and mobile vehicular noise sources associated with the operation of a project may increase existing noise levels and/or adversely expose people to severe noise levels.¹

Environmental noise is measured in decibels (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale (dBA) was devised. Because the human ear is less sensitive to low frequency sounds, the A-scale deemphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are represented by dBA. On this scale, the range of human hearing extends from about 3 dBA to about 140 dBA. A 10-dBA increase is judged by most people as a doubling of the sound level.

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For other noise impacts, see I.1. CONSTRUCTION NOISE, I.3. RAILROAD NOISE, and I.4. AIRPORT NOISE, as appropriate.

To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. The Community Noise Equivalent Level (CNEL) represents an energy average of the A-weighted noise levels over a 24-hour period with 5 dBA and 10 dBA increases added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. and 10:00 p.m. to 7:00 a.m., respectively. The increases were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day.

Because stationary noise sources include a wide range of noise-generating equipment and processes, which come from an equally wide range of uses, noise levels generated by stationary sources can vary substantially (for examples and descriptions, see 3. Data, Resources, and References). The effects of stationary noise depend on factors such as characteristics of the equipment and operations, distance and pathway between the generator and receptor, and weather. Stationary noise sources may be regulated at the point of manufacture (e.g., equipment or engines) or as a part of local codes and requirements (e.g., noise ordinance or zoning).

The predominant noise source within the City of Los Angeles is transportation, including railroad, airport and motor vehicle sources. Traffic volume, average speed, vehicular fleet mix (i.e., combination of automobiles, motorcycles, buses, and trucks), roadway steepness, distance and characteristics of the pathway between generator and receptor, and weather all influence the level of noise near roadways. For example, as the roadway traffic volume, speed, proportion of fleet mix represented by trucks, and roadway grade increase, so do the composite noise levels at the locations affected by the traffic noise. However, as the roadway volume increases beyond a certain point, congestion increases, in turn causing reduced traffic speeds, which would to some extent offset noise from the traffic volume increase. Dense urban areas within the City of Los Angeles may experience noise levels ranging from the low- to high-70 decibel range. The California Department of Motor Vehicles (DMV) has jurisdiction over noise emissions from individual vehicles (Motor Vehicle Code Section 23130).

C. Screening Criteria

- Would the proposed project introduce a stationary noise source² likely to be audible beyond the property line of the project site?
- Would the project include 75 or more dwelling units, 100,000 square feet (sf) or greater of

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Stationary noise sources may include, but are not limited to, machinery, engines, energy production, and other mechanical or powered equipment and activities such as loading and unloading or public assembly that may occur at commercial, industrial, manufacturing, or institutional facilities. Stationary noise sources do not include vehicles entering or exiting the property.

nonresidential development or have the potential to generate 1,000 or more average daily vehicle trips?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Operational Noise, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact from Operational Noise from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and the project traffic study to determine the size of each land use involved, information on stationary noise sources such as machinery or motorized equipment, and the vehicle trips that would be generated by the project. L.1. INTERSECTION CAPACITY explains how to calculate the number of average daily vehicle trips.

Determine the noise level from stationary sources at the property line by evaluating the decibel output of each source, the distance to the property line and the path over which the sound travels. Use an applicable noise model, as needed. In general, at a distance of 50 feet from the source over a hard surface, the decibel level decreases by 3 dBA, and over a soft surface (such as grass) the decibel level decreases by 4.5 dBA. For every doubling of distance thereafter, noise levels drop another 3 dBA over a hard surface and 4.5 dBA over a soft surface.³

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see the chart below).

-

Federal Highway Administration (FHWA), Highway Traffic Noise Prediction Model (FHWA R77-108), 1978.

Community Noise Exposure CNEL_db

Land Use	Normally Acceptable	Conditionally Acceptable	Normally <u>Unacceptable</u>	Clearly Unacceptable
Single Family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging - Motels, Hotels	50 - 65	60 - 70	70 - 80	above 80
Auditoriums, Concert Halls, Amphitheaters	-	50 - 70	-	above 65
Sports Arena, Outdoor Spectator Sports	-	50 - 75	-	above 70
Playgrounds, Neighborhood Parks	50 - 70	-	67 - 75	above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	-	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	-
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	-

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

<u>Clearly Unacceptable</u>: New construction or development should generally not be undertaken.

Source: California Department of Health Services (DHS).

Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Identification of surrounding land uses, including description, location and distance from the project; and

- Quantification of ambient noise levels (existing and projected at the time of project occupancy) measured in CNEL.

One of the following methodologies can be used to determine ambient noise levels:

- Field measurements involving the use of a noise meter at and surrounding the project site;
- "Presumed Ambient Noise Levels," as set forth in the Los Angeles Municipal Code (LAMC), Section 111.03 (see Exhibit I.1-1⁴); or
- A noise-monitoring program performed according to the procedures set forth in LAMC, Section 111.02 and 112.05. This involves taking measurements at selected locations to establish ambient background noise levels.

Project Impacts

The change in ambient noise levels is measured by adding project-generated operational noise to the projected future ambient noise level at the time of project occupancy. The incremental increase in noise generated by the project is the project impact. Calculate the future exterior ambient noise level according to the procedure outlined above, under Environmental Setting.

Stationary Sources

Review the project description and identify the type, amount, noise impact, and operating characteristics of proposed equipment on the project site (e.g., 24-hour function, sporadic use expected). Identify the distance and the characteristics of the pathway between the noise source and the nearby land uses that would receive the noise. Noise models may be used, as appropriate.

Noise levels 50 feet from a source decrease by approximately 3 dBA over a hard, unobstructed surface, such as asphalt, and by approximately 4.5 dBA over a soft surface, such as a vegetated area. For every doubling of distance thereafter, noise levels drop another 3 dBA over a hard surface and 4.5 dBA over a soft surface. These reduction rates can be used to adjust noise levels at the noise receptor locations, based on their relative distances from the project equipment.

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⁴ See I.1. CONSTRUCTION NOISE.

Once noise levels from individual pieces of equipment on the project site have been calculated, logarithmically add together the noise levels from all equipment operating simultaneously. (Noise levels measured in decibels increase logarithmically and cannot be added arithmetically.) Where the noise transmission path between the source and the receptor is complex, consult a noise specialist as necessary.

To determine the change in noise level, subtract the projected ambient noise level without the project's stationary noise from the projected noise level during project operation. Use the chart in the Significance Threshold to determine the significance of the difference.

Mobile Vehicular Sources

Review the project description, determine the number of vehicle trips to be generated by the project, and distribute the trips on the street system (use the traffic study or methodology described in L.1. INTERSECTION CAPACITY). Determine the characteristics of the noise transmission pathway. Using a mobile noise prediction model, project the future exterior ambient noise levels for these streets with and without the proposed project. Base the selected noise model on the Federal Highway Administration (FHWA) highway noise prediction procedures described in FHWA-77-108 or the most recent revision. The City of Los Angeles recommends the use of either LEQV2 or SOUND32 prediction models as developed by California Department of Transportation (Caltrans). LEQV2 requires the following information: (a) traffic volumes, (b) roadway, barrier and receiver geometry, (c) vehicle speed, (d) number of lanes, (e) fleet mix, and (f) drop-off rates. It uses angles, distances and elevations to define source-receptor spatial relationships. SOUND32 requires the following information: (a) traffic volumes, (b) roadway, barrier and receiver geometry, and (c) drop-off rates. This model uses a three dimensional coordinate system to define source-receptor spatial relationships.

If monitoring was used to quantify existing noise levels, use existing traffic conditions (volumes, roadway geometry, etc.) to model the existing noise levels. A comparison of monitored existing noise levels and modeled existing noise levels can be used to calibrate the modeling resulting.

To determine the change in noise level, subtract the projected noise level on the selected roadways without the project's traffic-generated noise from the projected noise level, including the project's traffic-generated noise. Use the chart in the Significance Threshold to determine the significance of the difference.

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Noise levels increase approximately 3 dBA for each doubling of roadway traffic volume, assuming that the speed and fleet mix remain constant. A change in vehicle speed can also change noise levels. If vehicle speed and fleet mix can be assumed to remain constant after project implementation, and the project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

For a program-level analysis where project details are unknown, assume the full build out of allowable land use and density. Use the methodology above to determine program-generated noise increases.

Cumulative Impacts

For impacts from stationary sources, as feasible, identify the type and amount of equipment to be used by the related projects. Determine whether noise from these sources would impact the same land uses impacted by the proposed project. For those, calculate and logarithmetically add the related project noise to project-generated noise to determine the cumulative effect of the activities.

The analysis for project impacts from mobile vehicular sources uses future traffic levels to establish future ambient noise levels. As these traffic levels include trips from the related projects, additional evaluation is not required.

Sample Mitigation Measures

Potential mitigation measures include the following:

Stationary Sources

- Redesign the source to radiate less noise (e.g., substitute a quieter equipment type process or enclose the source with sound absorbent material);
- Use insulation or construct solid barriers between noise sources and noise receivers;
- Separate noise sources from noise receivers by distances sufficient to attenuate the noise to acceptable levels;
- Insulate structures;

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- Limit the hours of use for the equipment;
- Prepare an acoustical analysis and adopt the resulting insulation and attenuation measures: and
- Conduct inspections of the equipment prior to issuance of the occupancy permit to verify on-site containment of noise emissions.

Mobile Vehicular Sources

- Attenuate the sound by using barriers, or redirect sound transmission paths;
- Reduce vehicle trip generation, or reduce speed limits on roadways; and
- Locate any delivery, truck loading, or trash pickup areas as far from noise sensitive land uses as possible. Limit designated hours for deliveries.

3. DATA, RESOURCES, AND REFERENCES

Noise Element, 1999. Available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, California 90012; Telephone: (213) 978-1255.

Noise Ordinance No. 156,363, LAMC Section 111.02 provides sound level measurement procedures.

Noise Ordinance No. 156,363, LAMC Section 111.03 provides ambient noise levels.

Noise Control Act of 1972.

Association of Environmental Professionals (AEP), Thresholds of Significance, Noise Thresholds, 1992.

FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), 1978.

LEQV2 and SOUND32 sound prediction models, developed by Caltrans.

California Noise Insulation Standards, CAC, Title 25, Housing and Community Development.

California Motor Vehicle Code, Section 23130.

Stationary Source Categories

Agricultural operations: Agricultural noise is generated by a host of soil preparation and crop harvesting equipment, pesticide applicators, and conveying and elevating equipment.

Commercial/Institutional: Building service equipment is generally considered a stationary noise source. Building service equipment includes heating, ventilating, and air conditioning facilities, water and waste water systems elevators, and escalators. The most common urban noise source in the air conditioning category is the modern high efficiency-cooling tower, which contains two noise sources - fans and water spray. The increasing use of window or through the wall packaged air conditioning units leads to the generation of noise outside. In addition to their inherent noise characteristics, as these units age, loose metal parts and window frames may rattle.

Home workshops and gardening tools: Noise from these sources includes various motors that operate power mowers, power trimmers, edgers and leaf blowers, and power operated saws and drills

Industrial: Much of the equipment used in industry and many industrial processes and operations generate noise. The intakes and discharges from fans, compressors, and engines often penetrate the walls of industrial buildings. Even a wholly enclosed industrial plant can generate noise because ducts and piping outside buildings radiate the noises generated from the inside. Inadequately insulated walls and roofs transmit noise. Sheet metal walls, for example, vibrate in response to inside noise and become effective noise radiators. Outdoor industrial operations also constitute sources of noise, including storage operations, steel and scrap yards, and truck and rail freight handling yards.

<u>Lumbering operations</u>: These operations involve the use of diesel powered equipment, chain saws, and hoisting and conveying equipment. Sawmill noise is produced by saws and planers and other lumber shaping equipment, the operation of hoisting and conveying equipment, and the operation of yard and loading equipment.

Mineral production: Mineral production includes both surface and underground mining; sand and gravel pit operations, and crushed rock operations. Noises generated from these sources include sounds emanating from rock crushers, screens, conveyor belts, diesel engines, electric motors, dump trucks, power shovels, rock drills, and blasting.

<u>Petroleum production and refining</u>: Principal sources of noise from petroleum production operations include pressure-reducing valves in pipes, steam turbines, derricks, gear boxes, compressors, electric

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motors, diesel engines, and maintenance equipment.

Port Operations: Primary noise sources from port activities include bulk-loading facilities, shipping container-handling equipment, truck traffic, and train movements. The sound of ship engines and trains running contribute to the low steady-state noise emanating from a port, which is punctuated by ship whistles and train horns.

Public and private utilities: Public and private utilities engage in construction activities producing the same kind of noises discussed in I.1 CONSTRUCTION NOISE. hydroelectric, steam and diesel electric generation plants, compressors, pumps and pipelines, all of which generate noises similar to those discussed above as industrial noise sources.

<u>Public services</u>: Sources of noise from public services include sirens on emergency vehicles, truck and loading noise from rubbish collection and disposal, and equipment noise generated through the maintenance of streets, sewers and water systems.

Mobile Source Categories

Automobiles: The passenger automobile usually makes much less noise than other types of motor vehicles. They produce little exhaust noise except at low frequencies. The combination of wind, gearing, and tire noises produces an identifiable spectrum of noise at speeds over 40 mph and at distances over 100 feet. At higher speeds, this combination of sounds is identifiable at distances up to one mile under quiet ambient conditions. The loudest element of automobile noise at a long distance is the sound of tires.

Buses: Buses tend to radiate less noise than other heavy vehicles because their engine compartments are sealed. Bus noise, however, usually increases with use because of damage to these seals.

Motorcycles: Motorcycle noise is distinctive because, in addition to noise from intake, exhaust, and gearing systems, motorcycles radiate considerable noise directly through the engine walls.

Trucks: Trucks make more noise than other motor vehicles. Diesel trucks are generally the most significant motor vehicle noise source. A single, large diesel truck may produce noise levels equal to noise generated by 30 passenger cars. Under most conditions of operation, exhaust noise predominates. At low speeds, under heavy acceleration, engine and transmission noise may be louder. At high speeds on level roadways, tire noise predominates. Other sources of noise from trucks include the chassis, brakes, sheet metal parts, loose pins, and cargo.

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I.3. RAILROAD NOISE

INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XI.a): Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Would the project result in exposure of persons to or generation of excessive XI.b): groundborne vibration or groundborne noise levels?
- A substantial permanent increase in ambient noise levels in the project vicinity above XI.c): levels existing without the project?
- A substantial temporary or periodic increase in ambient noise levels in the project XI.d): vicinity above the existing without the project?

B. Introduction

Railroad operations may increase existing noise levels and/or adversely affect noise-sensitive land uses. The effects of railroad noise depend on factors such as characteristics of the equipment and operations; distance and characteristics of the pathway between the generator and receptor; and weather. Section 17 of the Federal Noise Control Act, rather than state or local regulations, establishes controls and limits on railroad operations, through the United States Environmental Protection Agency (EPA) and United States Department of Transportation (U.S. DOT).

Environmental noise is measured in decibels (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale (dBA) was devised. Because the human ear is less sensitive to low frequency sounds, the A-scale deemphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are represented by dBA. On this scale, the range of human hearing extends from about 3 dBA to about 140 dBA. A 10-dBA increase is judged by most people as a doubling of the sound level.

To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. The Community Noise Equivalent Level (CNEL) represents an energy average of the A-weighted noise levels over a 24-hour period with 5 dBA and 10 dBA penalties added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. and 10:00 p.m. to

7:00 a.m., respectively. The penalties were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day. The Day-Night Sound Level (Ldn), like CNEL, measures noise exposure over a 24-hour period and adds a penalty based on the time of day, although only for late night/early morning hours (10 dBA penalty from 10:00 p.m. to 7:00 a.m.). Thus, the Ldn measurement is slightly less sensitive than CNEL, but it results in very similar noise ratings for most community settings, usually differing by less than 1 dBA.

Railroad operations are generally classified into either line operations or yard operations. Line operations consist of the movements of trains of various types over the main line and local tracks; yard operations are the various activities concentrated in a railway terminal. Yard operations generate noise through the disassembling and recoupling of cars to form new trains, and the maintenance and repair of cars and locomotives. For analytical purposes these may be considered as complex sources of stationary noise. Railroad operations are a much more common source of railroad noise than yard operations. The noise generated by train pass-bys is based on the type of vehicle in use, how it is operated, and the configuration of the track-bed relative to the surrounding terrain. The Federal Transit Authority (FTA) regulates noise generated by moving trains (e.g. whistles, warning signals, wheels on rails), rail maintenance yards, and activity associated with rail facilities.

The Department of Housing and Urban Development (HUD) prepared a Noise Guidebook, which addresses railroad noise, provides guidance on calculating noise levels from railroad operations, and includes a threshold of 3,000 feet between a railroad line and a noise-sensitive land use.

C. Screening Criteria

- Would project development result in a noise-sensitive land use being located within 3,000 feet of a railroad line?
- Would the project result in an increase in the number or length of non-commuter trains operating on existing tracks within 3,000 feet of a noise-sensitive land use?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Railroad Noise and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact from Railroad Noise from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, including information on railroad activities. Consult a map showing the location of noise-sensitive land uses within 3,000 feet of the project site. Noise-sensitive land uses include residences, schools, libraries, hospitals, day-care facilities, convalescent/retirement homes, and parks. Determine whether the project would result in railroad noise being generated within 3,000 feet of a noise-sensitive land use.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant impact with regard to exterior noise levels resulting from railroad operations if the project causes noise measured at the property line of a noise sensitive receptor to increase by 3 dBA in CNEL, to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see the chart below).

Land Use		·	ity Noise Exposur CNEL, db	e
	Normally <u>Acceptable</u>	Conditionally Acceptable	Normally <u>Unacceptable</u>	Clearly <u>Unacceptable</u>
Single Family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Playgrounds, Neighborhood Parks	50 - 70		67 - 75	above 72

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

<u>Conditionally Acceptable</u>: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Department of Health Services (DHS).

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Identification of noise-sensitive land uses within 3,000 feet of the project site, including description, location and distance from the site; and
- Ambient noise levels (existing and future) measured in CNEL.

One of the following methodologies can be used to determine ambient noise levels:

- Field measurements involving the use of a noise meter at and surrounding the project site;
- "Presumed Ambient Noise Levels", as set forth in the Los Angeles Municipal Code (LAMC), Section 111.03 (see Exhibit I.1-1¹); and
- A noise measurement program performed according to the procedures in the LAMC, Section 111.02 and 112.05. This involves taking measurements at selected locations to establish ambient background noise levels.

Project Impacts

Review the project description and identify the proposed number and type of rail operations per day. Use a map showing existing land uses to determine the location of, and distance between, sensitive receptors and railroad noise sources.

Guidance in the HUD Noise Guidebook can be used to calculate the resulting Ldn and, thus, CNEL levels. Using Exhibits I.3-1 and I.3-2, and based on the receptor distance from the railroad track, locate the appropriate distance on the horizontal axis (Effective Distance) and vertical axis (Average Daily Number of Operations). At the point of intersection of these two measurements, the diagonal axis will show the Ldn level.

HUD Methodology Assumptions:

- A clear line of sight exists between the railway track and the sensitive receptor;

See I.1. CONSTRUCTION NOISE.

- There are 50 cars per train;
- The average train speed is 30 miles per hour; and
- Nighttime operations represent 15 percent of the 24-hour total.

With diesel locomotives:

- There are two locomotives per train; and
- The site is not near a grade crossing requiring prolonged use of the train's horn or whistle.

With rapid transit and passenger trains:

- Rails are welded together.

If the project characteristics vary substantially from the HUD methodology assumptions, consult a qualified noise specialist for a more detailed analysis, as necessary. For diesel locomotives, the model described in *Assessment of Noise Environment Around Railroad Operations* may be utilized.² It includes variables not included in the HUD model, such as attenuation due to barrier shielding, duration in time of a train pass-by, correction for the presence of additional helper locomotives on an upgrade, and accounting for welded rails, bridges, and grade crossings. In addition, this model has several graphs for use in conjunction with the formula. These graphs include the decibel volume for the duration of a train pass-by depending on distance from the source, the noise level of rail cars based on the speed they are traveling, and the attenuation of sound levels due to a shielding barrier.

Establish the change in noise level from the project. Subtract the projected noise level without the project's railroad operations from the projected noise level with the project's railroad operations. Compare this information to the Significance Threshold.

Cumulative Impacts

As feasible, identify the type and amount of railroad activity expected as a result of related projects. Consider noise-sensitive land uses within 3,000 feet of the proposed and related projects(s). Add the increase in noise at the sensitive receptors from the related projects to that from the proposed project to determine the cumulative impact.

Wyle Laboratories, Assessment of Noise Environments Around Railroad Operations, pages 3-24 - 3-37, 1973.

Sample Mitigation Measures

Potential mitigation measures include the following:

Railroad Lines and Vehicles

- Use continuous welded rail instead of jointed rail on the steel wheel/rail interface;
- Utilize lightweight trucks to minimize unsprung weight;
- Use special grinding (truing) equipment to ensure smooth wheel/rail interaction;
- Use resilient rail fasteners instead of fixed rail fasteners for track fixation;
- Utilize resiliently supported ties where resilient rail fasteners are inadequate; and
- Provide sound barrier walls or insulation.

Rail Yards

- Enclose rail yards with solid fencing or walls;
- Insulate buildings; and
- Include sound attenuators on fans and ducts.

DATA, RESOURCES, AND REFERENCES

American Public Transit Association, Guidelines and Principles for Design of Rapid Transit Facilities, 1983.

- T.J. Schultz, W.J. Galloway, Office of Policy Development and Research, HUD, Noise Assessment Guidelines - Technical Background, 1980.
- U.S. DOT, Los Angeles Rail Rapid Transit Project Final Environmental Impact Statement (EIS), 1983.
- EPA, Background Document for Railroad Noise Emission Standards, 1975.

HUD, Noise Guidebook.

Wilson, Ihrig and Associates, Inc., Noise and Vibration Study for the Metro Rail Project, Final Report, 1982.

Wyle Laboratories, Assessment of Noise Environments Around Railroad Operations, 1973 (prepared for Southern Pacific Transportation Co., Union Pacific Railroad, the Atchison, Topeka and Santa Fe Railway Company, the Association of American Railroads.)

See also I.2. OERATIONAL NOISE.

Railroad Operations and Characteristics

There are three major railroad companies with regular freight traffic operating in the City of Los Angeles: Southern Pacific, Santa Fe, and Union Pacific. The Southern Pacific has an active rail yard in the Boyle Heights area within the City of Los Angeles. The Santa Fe and Union Pacific rail yards are located outside the City of Los Angeles, in the cities of Vernon and Commerce, respectively. In addition, such rapid transit systems as Amtrak, light rail trains (Blue Line), and commuter trains (MetroLink) serve the City of Los Angeles.

There are three general types of railroad vehicles: locomotives, rail cars, and rapid transit vehicles. These vehicles, either in combination with one of the other types or by themselves, form three general train categories. These are freight trains, conventional passenger trains, and rapid transit trains. A freight train consists of one or more locomotives, usually diesel, pulling a combination of various types of freight cars. A conventional passenger train is similar to a freight train in that it consists of one or more locomotives pulling several coaches, but one important difference is that the locomotive may either be diesel-electric or all electric (there are also gas turbine locomotives, but these are few in numbers). The third type, rapid transit trains, differs from the others in that there is not a centralized source of propulsion pulling a series of cars, but rather electric motors on the axles of each car

A diesel locomotive utilizes a diesel engine driving an electrical alternator or generator, which in turn drives electric traction motors on the wheels. An all-electric locomotive, on the other hand, obtains its electrical power from an external source; normally an overhead line or third rail, to drive its traction motors. Having no propulsion system, freight cars and passenger coaches generate noise mainly by the rolling of the wheels on the rails. The magnitude of the noise depends heavily on the condition of the wheels and track, and on the type of vehicle suspension. In regards to rail cars, modern passenger coaches with auxiliary hydraulic suspension systems in addition to normal springs can be about 10 dBA quieter than older passenger coaches or freight cars which have only springs. The noise of rapid transit trains, even though there are electric motors on each axle that are sources

of noise, is also predominantly generated by the interaction of the wheels upon the rails. In fact, because rapid transit vehicles are usually newer and have better suspension systems, they are generally quieter than freight cars or passenger coaches. Exhibit I.3-4 shows average noise levels for locomotives, locomotives with mufflers and railcars.

Evidence indicates that jointed tracks exceed noise levels produced by welded tracks by up to 8 dBA. Railway traffic noise can be affected by several other sources, including jointed tracks, as indicated in Exhibit I.3-5. Rail yard noise is usually not an issue due to the size of rail yards and their location in less noise sensitive industrial areas. However, Exhibit I.3-6 includes some average noise levels for different sources of rail yard noise.

Selected Legislation

Federal

Section 17 of the Federal Noise Control Act requires that the EPA set noise emission standards for the equipment and facilities of interstate railroad carriers and establishes that the Secretary of Transportation will enforce them. In order to ensure safety considerations and technological availability, any standard or revision to a standard may be issued only after consulting with the Secretary of Transportation. These standards apply to the equipment's use and maintenance. On December 31, 1975, the EPA issued its first railroad noise regulation. This regulation set noise emission standards for locomotives and rail cars operated by interstate rail carriers. The regulation, which became effective December 31, 1976, set the following noise emission standards for locomotives measured from a distance of 100 feet:

73 dBA at idle; 93 dBA stationary at all other throttle settings; and 96 dBA moving at any speed.

The standards established for rail cars were:

88 dBA up to 46 miles per hour; and 93 dBA greater than 45 miles per hour.

For new locomotives in service after December 31, 1979, the standards set were:

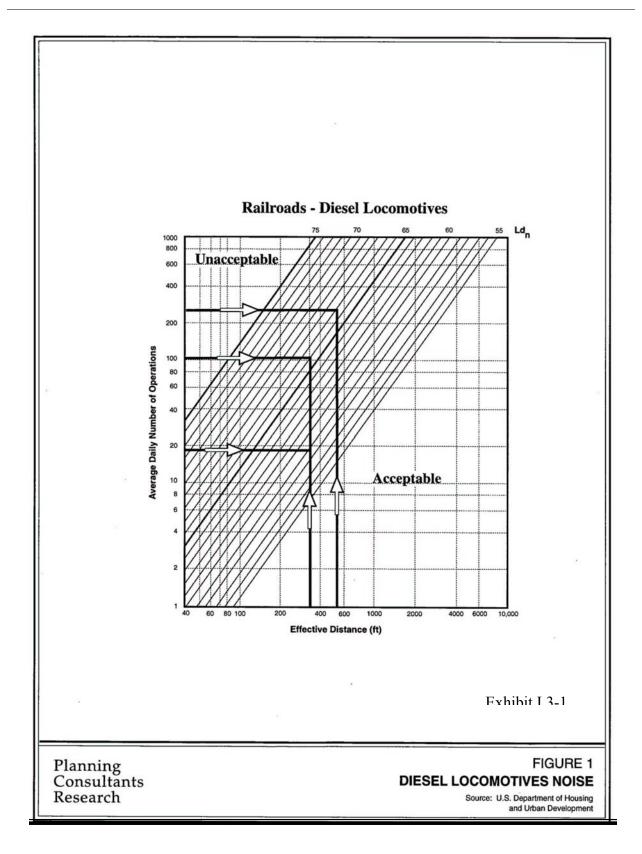
70 dBA at idle; 87 dBA stationary at all other throttle settings; and 90 dBA moving.

In January 1980, the EPA published final noise emission regulations for four railroad noise sources. The regulations, which took effect in January 1984, set additional noise emission standards for rail yard operations and equipment, such as switcher locomotives, retarders, and car coupling.

Local

The Noise Element includes the following guidelines:

- Ensure that any steel track rapid transit system serving the City considers the use of welded rails in preference to jointed rails in order to reduce track vibration noise; and
- Develop a program to encourage railroads to provide noise-attenuating buffers along railroad rights-of-way (ROW) in residential areas.



Railroads - Rapid Transit and Railway Cars

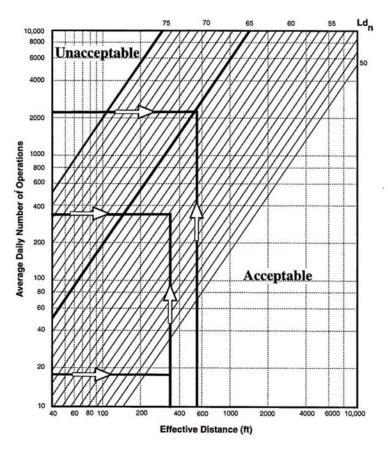


Exhibit I 3-2

Planning Consultants Research FIGURE 2
ELECTRIC RAPID TRANSIT NOISE

Source: U.S. Department of Housing and Urban Development

Exhibit I.3-3 AVERAGE LOCOMOTIVE, RAILCAR, AND RAPID TRANSIT NOISE LEVELS

Туре	Overall Maximum^a (dBA)
Locomotive	93
Locomotive with Exhaust Muffler	87
Railcar -less than 45 miles per hour (mph)	88
Railcar - over 45 mph	93
Rapid Transit	85

At a distance of 100 feet

EPA, Background Document for Railroad Noise Emission Standards, pages 2-2 to 2-4.

Exhibit I.3-4 VARIABLES AFFECTING RAILCAR WHEEL/RAIL NOISE EMISSION

Variable	Noise Emission ^a	
Jointed Rails (vs. Welded)	4 to 8 dBA	
Grade Crossings	6 to 8 dBA	
Wheel Irregularities – Flat Spots or Built-up Tread	Up to 15 dBA	
Bridges		
a. Light Steel Structureb. Heavy Steel Structurec. Concrete Structure	Up to 30 dBA Up to 15 dBA 0 to 12 dBA	
Short Radius Curves		
a. Less than 600 foot radiusb. 600 to 900 foot radius	15 to 25 dBA 5 to 15 dBA	

These factors are assumed to act individually. When in combinations of two or more, the net increase will not be equal to the sum of each component, but most likely the largest individual factor.

Source: Wyle Laboratories, Assessment of Noise Environments Around Railroad Operations, page 2-3.

Exhibit I.3-5 AVERAGE RAIL YARD NOISE LEVELS

Noise Source	Level (dBA) ^a
Switcher Movement	76 - 80
Car Impact	91
Retarder	94 - 109
Public Address Systems	90 - 95
Engine Load Tests	92
Locomotive Service Racks	79.5
Mechanical Refrigerator Car - Engine Side	71
Mechanical Refrigerator Car - Condenser Side	64
Idling Locomotive	73
Idling Locomotive with Exhaust Muffler	70

^a At a distance of 100 feet

Source: Wyle Laboratories, Assessment of Noise Environments Around Railroad Operations, pages 4-1 to 4-29.

I.4. AIRPORT NOISE

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XI.a): Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- XI.b): Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- XI.c): A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- XI.d): A substantial temporary or periodic increase in ambient noise levels in the project vicinity above the existing without the project?
- XI.e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

B. Introduction

New or modified airport and heliport operations and associated aircraft activities may increase existing noise levels and may adversely affect noise-sensitive land uses. The California Department of Transportation's (Caltrans) Division of Aeronautics has developed a set of noise regulations, based on the Federal Aviation Administration's (FAA) Federal Aviation Regulations (FAR), which set noise limits for specific aircraft and provide guidance for land-use compatibility around airports. The effects of airport noise depends on factors such as characteristics of the equipment and operations; distance and pathway between the generator and receptor; and weather. Noise generated due to aircraft flyovers depends upon such variables as type and size of the aircraft (e.g. 2- or 3engine turbofan versus 4-engine widebody turbofan) and its operating characteristics (primarily its thrust level).

The four airports operated by the City of Los Angeles include Los Angeles International (LAX), Van Nuys, Palmdale, and Ontario. The Burbank-Pasadena-Glendale Airport, due to its proximity to the City, influences the noise environment in some areas of Los Angeles. Noise levels generated by the operation of two other airports within or near the City of Los Angeles, Santa

Monica Municipal Airport and Whiteman Airport, generally do not exceed 65 decibels within the Community Noise Equivalency Level (CNEL) contours, and as such do not strongly influence the City's noise environment.

Environmental noise is measured in decibels (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale (dBA) was devised. Because the human ear is less sensitive to low frequency sounds, the A-scale deemphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are represented by dBA. On this scale, the range of human hearing extends from about 3 dBA to about 140 dBA. A 10-dBA increase is judged by most people as a doubling of the sound level.

To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. CNEL represents an energy average of the A-weighted noise levels over a 24-hour period with 5dBA and 10 dBA penalties added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. and 10:00 p.m. to 7:00 a.m., respectively. The penalties were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day. The Day-Night Sound Level (Ldn), like CNEL, measures noise exposure over a 24-hour period and adds a penalty based on the time or day, although only for late night/early morning hours (10 dBA penalty). Thus, the Ldn measurement is slightly less sensitive than CNEL, but it results in very similar noise ratings for most community settings, usually differing by less than 1 dBA.

For the purpose of airport noise impact analyses, CNEL levels are described as contours. A contour is an interpolation of noise levels drawn to connect all points of a similar level. These contours are displayed on maps and appear similar to topographical contours, forming "footprints" surrounding a noise source.

The FAA regulates noise levels for aircraft at all United States airports. In 1969, FAR Part 36 certified noise levels for specific aircraft. FAR Part 150, Airport Noise Compatibility Planning, which became effective in 1981, provides guidance for land-use compatibility around airports. This FAR established a voluntary program, which provides that airport noise impacts are quantified and made public and that noise compatibility plans and mitigation measures are subject to public review and FAA approval. Part 150 states that in general, residential uses are not compatible within the 65 or above dBA Ldn contour and that all types of land uses are compatible in areas below 65 dBA Ldn. In addition, the FAA's Airport Environmental Handbook indicates that its threshold of significance is a 1.5 dBA Ldn increase in noise in any sensitive area located within the 65 dBA Ldn contour.

The Division of Aeronautics is responsible for granting variances from compliance with state noise laws for airports in California. The Division of Aeronautics has also developed noise regulations, adopted in 1970, which are based in part on the FAR Part 150 guidelines. These regulations state that the aircraft noise level in a residential setting should be no greater than 65 dB CNEL. One of the objectives of the Division of Aeronautics is to create an urban development pattern in which all land included within the 65 dB CNEL contour is devoted to either airport or non-sensitive land uses

C. Screening Criteria

If the proposed project includes the construction or expansion of an airport or heliport and has the potential to expose noise-sensitive land uses to high noise levels (through proximity of such land uses to the flight path, etc.), would the project result in an incompatible land use existing within the 65 dB CNEL contour of an airport or heliport?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Airport Noise and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact from Airport Noise from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, including information on airport activities. Consult a map showing the 65 dB CNEL contour and surrounding land uses. Consider whether potential incompatible land uses have acoustical insulation, an avigation agreement with the airport operator, etc. Operations at commercial airports involving turboprop or piston engine aircraft under 70,000 lbs. have reduced potential to expose sensitive land uses to high noise levels because of the quieter noise levels generated by these aircraft. Compare this information with the screening criteria to determine whether incompatible uses would be located within the 65 dB CNEL contour.

Incompatible land uses include the following¹:

Residences, including but not limited to, detached single-family dwellings, multi-family dwellings, high-rise apartments, condominiums and mobile homes, unless:

Division of Aeronautics, Noise Standards (Title 21, Subchapter 6, Article 1) 1990, pages 225-226.

- An avigation easement² for aircraft noise, has been acquired by the airport proprietor:
- A dwelling unit which was in existence at the same location prior to January 1, 1989, and has adequate acoustic insulation to ensure an interior CNEL of 45 dB or less due to aircraft noise in all habitable rooms:
- A residence is a high rise apartment or condominium having an interior CNEL of 45 dB or less in all habitable rooms due to aircraft noise, and an air circulation or air conditioning system, as appropriate;
- A residence exposed to an exterior CNEL less than 80 dB (75 dB if the residence has an exterior normally occupiable private habitable area) where the airport proprietor has made a genuine effort to acoustically treat the residence or acquire avigation easements for the residence involved, or both, but the property owner has refused to take part in the program; or
- A residence which is owned by the airport proprietor;
- Public and private schools of standard construction for which an avigation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to ensure an interior CNEL of 45 dB or less in all classrooms due to aircraft noise;
- Hospitals and convalescent homes for which an avigation easement for noise has not been acquired by the airport proprietor, or that do not have adequate acoustic performance to provide an interior CNEL of 45 dB or less due to aircraft noise in all rooms used for patient care; and
- Churches and other places of worship for which an avigation easement for noise has not been acquired by the airport proprietor or that do not have adequate acoustic performance to ensure an interior CNEL of 45 dB or less due to aircraft noise.

An avigation easement is a legal agreement to purchase the right to fly over a property owner's land without penalty.

2 **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

A significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dB CNEL and the project increases ambient noise levels by 1.5 dB CNEL or greater.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following:

- Identification of ambient noise levels (existing and future) measured in CNEL. Use the 65 dB CNEL contour map or mathematical models to assess existing (at the expected time of project implementation) noise conditions. Model future noise levels by establishing parameters and assumptions, including aircraft fleet compositions at the airport for which a project is being analyzed, fleet forecasts, appropriate aircraft substitutions, departure profiles, tracks, thrusts settings, operational time of day (day, evening, or night), airport configurations (runway length and location, departure and landing thresholds, etc), and the algorithms used to calculate individual aircraft noise profiles. Use a recognized aircraft noise model, such as one of the following:
 - The Integrated Noise Model (INM), developed by the FAA and used extensively for commercial airports, produces noise contours to geographically demonstrate the location and level of average, weighted noise impacts;
 - The Area Equivalent Method (AEM), developed by the FAA, produces the aggregate area of noise impact without demonstrating the location of specific noise levels; it can be used as a screening tool to determine whether the more sophisticated and time consuming INM is warranted;
 - The Helicopter Noise Model (HNM), developed by the FAA, is used for projects which primarily involve helicopter operations; and
 - The Noise Map, developed by the United States Air Force (USAF), is primarily used to analyze military operations.

Characterization of noise-sensitive land uses within the 65-dBA contour of airport operations, including the description and location within the contour. Identify noise attenuation devices, avigation easements, and other relevant features of the land uses; and

Project Impacts

Use the information from the Evaluation of Screening Criteria and Environmental Setting and one of the aircraft noise models described above to develop future noise contours. Results from the INM are preferred for commercial airports because of the level of sophistication and detail provided. Identify noise sensitive uses at which noise levels exceed 65 dB CNEL as a result of airport operations. Calculate the increase in ambient noise levels due to project operations at these locations. Compare this information to the Significance Threshold.

Cumulative Impacts

The projection of future baseline ambient noise levels incorporates background increases in noise and airport-related noise from the related projects. Therefore, no new analysis is required.

Sample Mitigation Measures

Possible mitigation measures include the following:

- Redirect air traffic over the ocean (for coastal airports) or over less populated areas;*
- Acquire noise-impacted land. The FAA's Uniform Relocation Assistance and Real Property Acquisition rules and provisions govern land acquisition and relocation assistance;
- Purchase avigation easements;
- Reduce the number of flights during evening and nighttime hours;*
- Increase takeoff angles within safety parameters or reducing thrust settings, depending on proximity and configuration of surrounding land uses;*
- Plan runway utilization schedules to take into account adjacent residential areas, noise characteristics of aircraft, and noise-sensitive time periods;*

- Employ shielding to obstruct the noise path to incompatible uses, using natural terrain, buildings, and other obstructions to noise; and
- Develop compatible land uses within the noise boundary through rezoning, or application of acoustical insulation.
- Strategies marked with * require FAA approval

3. DATA, RESOURCES, AND REFERENCES

Los Angeles World Airports, Van Nuys Airport Noise Control Regulation EIR, 1992.

Los Angeles World Airports, Draft Van Nuys Airport Master Plan, 1995.

Division of Aeronautics, Noise Standards, 1990.

FAA, Airport Environmental Handbook, 1985.

See also I.2. OPERATIONAL NOISE.

Selected Legislation

Federal

FAR, Part 36

Establishes noise standards and provisions for issuing certificates for various types of aircraft. Also, the aircraft must meet the airworthiness regulations constituting the type certification basis of the aircraft under the conditions in which compliance with this part is shown.

FAR, Part 150

Describes the procedures, standards, and methodology governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs. matching funds available for abatement programs.

State

California Airport Noise Standards Act, 1970 (CAC, Title 4)

Implements the FAA airport standards, administered by the State Division of Aeronautics. Requires civilian airports to meet FAA noise standard of 65 dB CNEL at airport boundaries.

CCR, Title 21 (Business Regulations)

Requires airports to monitor noise impacts and report to the County Airport Land Use Commission and State Division of Aeronautics on a quarterly basis.

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J. POPULATION AND HOUSING

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J.1. POPULATION AND HOUSING GROWTH

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

XII.b): Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

B. Introduction

The quantity and distribution of population and households in the City affects the environment, use of infrastructure, and the demand for public services. Thus, in order to respond to and plan for future population and households, the General Plan, including the Framework and Housing Elements, and the Southern California Association of Government (SCAG) Regional Comprehensive Plan and Guide (RCP&G) include forecasts of population and housing trends. Because the projections are used to plan the infrastructure and level of service required to support the future population, actual growth in excess of the projections can lead to deficiencies. According to the CEQA Guidelines Section 15064(e): "Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment." Population and housing growth are examples of economic and social changes.

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¹ The City of Los Angeles uses two different estimates of its population. The first is prepared by the California Department of Finance (DOF) and provided to SCAG. For purposes of conformity with the requirements of these other agencies, the City uses this estimate when and where appropriate. The City Planning Department prepares an estimate of its population based on a number of locally derived factors including: building and demolition permits issued, school enrollments, and the percentage of active electric meters. The City Planning Department estimates are used for planning purposes in the City of Los Angeles. It should be noted that both sets of numbers are estimates and, therefore, only close approximations of the actual population. Every 10 years these estimates are reconciled by the U.S. Census.

Population refers to the occupants of housing projects, population indirectly associated with workers of proposed non-residential projects, or changes in the amount and distribution of population and employment permitted by adoption or revision to a land use plan. Important areas include changes in the number, characteristics, geographic distribution, and timing of new residents directly or indirectly resulting from a proposed project, and the degree to which project-related changes are consistent with City, regional or other adopted population growth policies. Other issues are the degree to which project-related population is already present in the area under analysis (i.e., already residing or working in the area), or whether they represent in-migrants (i.e., likely to relocate into the area from some other more distant location as a result of the project).

Housing impacts may result directly from projects, which include housing units, or indirectly from, for example, revisions to the Housing Element or changes in housing demand associated with new non-residential development projects. Important issues include changes in the number, characteristics (including rent level or purchase price), geographic distribution, and timing of new housing units associated with a proposed project, supply-demand relationships, and the degree to which project-related changes are consistent with City, regional or other adopted housing growth policies.

C. Screening Criteria

- Would the project include a General Plan amendment, which could result in an increase in population over that projected in the adopted Community Plan or General Plan?
- Would the project induce substantial growth on the project site or surrounding area?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Population and Housing Growth, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Population and Housing Growth from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and the surrounding area. Determine whether the project includes a General Plan amendment, and identify the potential to induce substantial growth. General Plan amendments which could result in an increase in population are those for which the population in the planning subregion containing the project site would exceed the population forecast in the Framework Element after buildout to the maximum amount permitted

under the General Plan amendment. The potential to induce substantial growth may be indicated by the introduction of a project in an undeveloped area or the extension of major infrastructure. As necessary, contact the City Planning Department Demographics and Framework Monitoring Sections for current analysis, data, and department policy. Examples of major infrastructure systems include: major roads, highways, or bridges; major utility or service lines; major drainage improvements; or grading which would make accessible a previously inaccessible area. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/ planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;
- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Recent population and housing growth trends for the planning subregion containing the project site (e.g., past 10 years);
- Forecast or projection of population and housing growth for the planning subregion containing the project site; and

Summary of population and/or housing growth policies that affect or regulate the project site. These may include, for example, the Community Plan, General Plan (including the Framework and Housing Elements), redevelopment plan, the City's Housing and Urban Development (HUD) Consolidated Plan, or SCAG's RCP&G.

Project Impacts

Determine the amount of growth from the project by calculating the number of housing units included as part of the project and the occupancy of the units. Occupancy is related to design and the number of bedrooms per unit (i.e., for seniors, large families, etc.). For nonresidential uses, estimate the population associated with employees based on the type of use and the corresponding type of employment (e.g., degree of skill required, wage levels, likelihood of causing in-migration). To evaluate the degree to which the project would exceed adopted population or housing projections for the planning subregion containing the project site, consider forecasts found in, for example, the applicable specific plan, General Plan, Framework Element, Community Plan, redevelopment plan, or RCP&G. A physical change in the environment would affect the land, air, water, flora, fauna, noise conditions, minerals, objects of historic or aesthetic significance, etc.

If the project is in an area that is currently undeveloped or unserved by major infrastructure, and the project would introduce infrastructure or accelerate development, then non-contiguous "leapfrog" or other undesirable or inefficient development patterns may result if project growth is not consistent with adopted projections and policies. Consider whether the proposed infrastructure has been analyzed or planned for in the Community Plan. Examples of major infrastructure systems include: major roads, highways, or bridges; major utility or service lines; major drainage improvements; or grading which would make accessible a previously inaccessible area.

Evaluate the extent to which growth would occur without implementation of the project by determining the amount, timing, and location of growth contemplated for the project site and surrounding area in the adopted population and housing projections. Compare this to the growth anticipated with the proposed project and determine whether potential impacts are significant.

Cumulative Impacts

Determine the increase in housing units, occupancy and population associated with the related projects in the same manner as described above under Project Impacts. Compare the combined effect of the growth from the project and the related projects to the amount, timing and location of growth forecast for the project site and surrounding area in the adopted

population and housing projections. If the area is currently underdeveloped or the project introduces new major infrastructure, also note whether the project or related projects would introduce infrastructure or accelerate development.

Sample Mitigation Measures

As noted in the Introduction, population and housing growth are not considered significant effects on the environment. Secondary or indirect impacts, such as increased traffic or noise, may be significant and may be physical changes caused by population and housing growth. Thus, mitigating these secondary impacts may mitigate the effects of population and housing growth.

3. DATA, RESOURCES, AND REFERENCES

<u>City of Los Angeles</u>: For adopted housing policies, see the Housing and Framework Elements and the City's HUD Consolidated Plan. The HUD Consolidated Plan is updated annually in July, and is available from the Community Development Department (CDD) at 215 West Sixth Street, Los Angeles, California 90014; Telephone: (213) 485-4682. For current population and housing estimates, see Population and Housing Estimates, 1999 (updated periodically), City Planning Department, Demographical Research Unit, 200 N. Spring St., 7th Floor, Los Angeles, California 90012; Telephone: (213) 978-1416; Internet: www.lacity.org/PLN (click on Statistical Info).

SCAG: RCP&G, Chapter 3: Growth Management. SCAG's regional growth forecast to the year 2025 is available in a Small Area Forecast edition, which includes employment, households and population (including limited characteristics) at the census tract level for the entire sixcounty SCAG region. Available at SCAG offices, 818 West Seventh Street, 12th Floor, Los Angeles, California 90017; Telephone: (213) 236-1800; Internet: www.scag.ca.gov.

Center for the Continuing Study of the California Economy (CCSCE): This research center based in Palo Alto, California, publishes an annual five-year forecast of economic and population growth at the county level. See for example, California County Projections, which includes data on population growth, household growth, and income growth, for each county in the state, including Los Angeles County. CCSCE is located at 610 University Avenue, Palo Alto, CA 94301; Telephone: (650) 321-8550.

U.S. Census of Population and Housing: The Bureau of the Census is generally regarded as the most authoritative source of population and housing data, although its estimates are only prepared every 10 years. Summary Tape Files 1 and 3 provide the most commonly used data, at a scale as small as a census block. Available at public libraries.

J.2. POPULATION AND HOUSING DISPLACEMENT

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

- XII.b): Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- XII.c): Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

B. Introduction

Within the City of Los Angeles, the supply of and demand for housing, especially affordable housing, indicates that the existing stock should be preserved, maintained, and expanded in order to provide for the population. The CEQA Guidelines Section 15064(e) states "economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment."

A recent study prepared for the Housing Department¹ explored some of the current housing problems in the City of Los Angeles, including:

- Lack of growth in the supply of housing despite an increasing number of households;
- Household-housing type mismatch because average unit size is small and declining, while average household size is large and increasing;
- Overcrowding; and
- Increasing rent burden such that more than 30 percent of income goes for rent. This
 situation is related to household size, income, ethnicity, as well as the age of the head of the
 household.

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Housing Department, 1994 Housing Study, prepared by Hamilton, Rabinovitz & Alschuler, Inc., December 1995.

Adopted City programs and policies, designed to increase and conserve the supply of housing, particularly the supply of housing affordable to lower-income households, are contained in the Housing and Framework Elements, the Housing and Urban Development (HUD) Consolidated Plan, redevelopment plans, and the Rent Stabilization Ordinance. Examples of these policies and other regulations include:

- Housing Element, which discourages the demolition of affordable housing and encourages the replacement of affordable housing; obligates the City to provide relocation services to persons who are displaced as a result of City actions; and mandates mitigation of relocation and displacement hardships caused by housing demolitions, conversions or neighborhood gentrification;
- Comprehensive Housing Affordability Study (CHAS) -- a component of the HUD Consolidated Plan -- which contains a description of current housing policy, particularly with respect to low-income housing needs;
- The Rent Stabilization Ordinance, which includes requirements for relocation payments to tenants under "no-fault" evictions:
- State redevelopment law which specifies actual relocation assistance, in addition to payments, for displaced households and requires replacement of all lost units that occur within or as a result of redevelopment projects subject to a written agreement with the redevelopment agency or where financial assistance is provided by the redevelopment agency; and
- Federal law that mandates relocation payments and assistance when displacement results from a project supported with federal funds (e.g., HUD financing).

C. Screening Criteria

Would the project result in a net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means? (One-half block is generally equivalent to 15 single-family or 25 multi-family dwelling units.)

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Would the project result in the <u>net</u> loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Population and Housing Displacement, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Population and Housing Displacement from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and determine the number and type of housing units, which will be eliminated and added as a result of the proposed project. Calculate the net change in the number of habitable housing units, as well as units affordable to very low- or lowincome households (See Exhibit J.2-1). Affordable units can be lost through conversion to market rate units. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the proposed project, in terms of net loss of market-rate and affordable units:
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographic characteristics of the project area and the appropriateness of housing in the area; and

Whether the project is consistent with adopted City and regional housing policies such as the Framework and Housing Elements, HUD Consolidated Plan and CHAS policies, redevelopment plan, Rent Stabilization Ordinance, and the Regional Comprehensive Plan and Guide (RCP&G).

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of existing land uses on the project site and in the surrounding area;
- Recent (e.g., past 10 years) housing supply and demand trends, as well as housing supply characteristics (e.g., vacancy patterns, tenure, rent and sale price levels) for the project site and surrounding area;
- Housing supply and demand forecasts for the project site and surrounding area; and
- Summary of housing displacement policies applicable to the project. These may include policies in the Framework and Housing Elements, HUD Consolidated Plan, redevelopment plans, and the Rent Stabilization Ordinance.

Project Impacts

Review the description of the proposed project and identify the net change in the number of habitable housing units, as well as units affordable to low- and very-low income households, from the Evaluation of Screening Criteria.

To determine current and anticipated housing demand and supply in the project area, use the Population Estimate and Housing Inventory prepared by the City Planning Department, field research, published reports, or market research studies, as appropriate.

In evaluating the characteristics of the project area, survey the land uses and zoning designations for parcels in the surrounding area. Determine the character of the area and any recent housing trends, and consider the appropriateness of housing in that location in light of applicable housing policies and plans. Land use compatibility is addressed in H.2 LAND USE COMPATIBILITY.

Identify adopted housing projects in, for example, the applicable redevelopment plans, the Framework Element, HUD Consolidated Plan, Rent Stabilization Ordinance, or RCP&G. If necessary, consult with the City Planning Department, Housing Department, or Community Redevelopment Agency (CRA) of the City of Los Angeles.

Evaluate whether the project would be consistent with these policies.

Cumulative Impacts

Determine the number and type of housing units to be eliminated and added as a result of the related projects in the same manner as described above for Project Impacts. Compare the combined effect of the displacement from the project and the related projects to the current and anticipated housing demand and supply in the project area and adopted housing policies.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Exceed the statutory requirements for relocation assistance; and
- Increase the number of housing units affordable to lower income households.

DATA, RESOURCES, AND REFERENCES

Population and Housing Estimates are available from the City Planning Department, Citywide Demographics Unit, 200 N. Spring Street, 7th Floor, Los Angeles, California 90012; Telephone: (213) 978-1416; Internet: www.lacity.org/PLN (click on Statistical Info).

Redevelopment plans are available from the CRA, 354 South Spring Street, Suite 800, Los Angeles, California 90013; Telephone: (213) 977-1600.

Rent Stabilization Ordinance, City of Los Angeles, adopted 1979 (periodically updated and revised). Available at the Housing Department's Public Counter, 3550 Wilshire Boulevard, 15th floor, Los Angeles, California 90010, open Monday through Friday from 8:00 a.m. to 4:30 p.m., or call toll free (866) 557-7368.

Housing Department, 1994 Rental Housing Study, prepared by Hamilton, Rabinovitz & Alschuler, Inc., December 1995.

See also J.1. POPULATION AND HOUSING GROWTH.

Selected Legislation

Federal

24 CFR Part 970.5

Tenants who are to be displaced as a result of demolition or disposition must be relocated to other decent, safe, sanitary, and affordable housing (at rents no higher than permitted under the Uniform Relocation Assistance and Real Property Acquisition Policies Act). The new housing, to the maximum extent practicable, should be housing of the tenants' choice, on a nondiscriminatory basis, without regard to race, color, religion (creed), national origin, handicap, age, or sex, in compliance with applicable Federal and State laws.

In addition to provision of relocation housing, assistance to all displaced tenants includes assistance in finding other suitable housing, including payment of actual, reasonable moving costs, and counseling and advisory services to assure that full choices and real opportunities exit for tenants displaced from public housing scheduled for demolition or other disposition to select relocation housing in a full range of neighborhoods in which suitable relocation housing may be found, in and outside areas of minority concentration.

Exhibit J.2-1

MAXIMUM AFFORDABLE RENT FOR VERY LOW- AND LOW-INCOME HOUSEHOLDS IN THE CITY OF LOS ANGELES, FY 2003

Household Income Category as Percent of Median Family Income (MFI)	Household Size					
	1-Person	2-Persons	3-Persons	4-Persons	5-Persons	6-Persons
Very Low-Income (up to 50% of MFI)						
Maximum Household Income ^a	\$19,740	\$22,560	\$25,380	\$28,200	\$30,456	\$32,712
Maximum Monthly Rent ^b	494	564	635	705	761	818
Low-Income (51-80% of MFI)						
Maximum Household Income (73% of MFI) ^a	\$28,820	\$32,938	\$37,055	\$41,172	\$44,466	\$47,760
Maximum Monthly Rent ^b	720	823	926	1,029	1,112	1,194

^a Per Department of HUD.

Source: Department of HUD; Hamilton, Rabinowitz & Alschuler, Inc., 1996 and the City of Los Angeles Housing Department, 2003.

^b Assumes 30% of monthly income for rent, rounded to nearest dollar.

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K. PUBLIC SERVICES

City of Los Angeles L.A. CEQA Thresholds Guide

K.1. POLICE PROTECTION

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

XIII.a.ii): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

B. Introduction

Public protection service and law enforcement are provided by the Los Angeles Police Department (LAPD) which operates 18 stations (also called areas) citywide within four Bureaus (Central, South, West, and Valley). Statistical data is compiled by Reporting Districts, smaller units within the stations.

Service needs are related to the size of the population and geographic area served, the number and type of calls for service, and other community characteristics. Projects that affect these factors may increase the demand for service from the LAPD.

The effect of increased traffic congestion on response times for police protection and other emergency services is discussed in K.2. FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES.

C. Screening Criteria

Would the proposed project result in a net increase of 75 residential units, 100,000 square feet (sf) of commercial floor area, or 200,000 sf of industrial floor area?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Police Protection, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Police Protection from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and determine the type of land use(s) proposed (i.e., commercial, industrial, residential), and the size of the project (i.e., number of units, square footage). Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Name and characteristics of the station and Reporting District in which the project is located. If the Bureau, station, and Reporting District are unknown, refer to Exhibits K.1-1 through K.1-19; and

- Description of scheduled improvements to LAPD services (facilities, equipment, and officers) at the station serving the project site.

Project Impacts

Consider the description and location of the project. Determine the net population increase resulting from the project. The population conversion factors below may be used.

Based on consultation with LAPD, evaluate the demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (facilities, equipment, and officers) and the project's proportional contribution to the demand.

Evaluate project security features (e.g., security cameras, officers, lights, fencing, gates, etc.) if any, and any other project features, which would reduce the expected demand for police service.

POLICE SERVICE POPULATION CONVERSION FACTORS

Land Use	Conversion Factor		
Residential			
Single, one-, two-bedroom units	3 persons/unit		
Three-, four-bedroom units	4 persons/unit		
Office	4 persons/1,000 sf		
Retail	3 persons/1,000 sf		
Hotel	1.5 persons/room/day		

Cumulative Impacts

Identify the related projects, which would be served by the same LAPD facilities as the proposed project. Consider the characteristics of the related projects in terms of size, location, and types of land uses. Determine the net population increase resulting from the related projects. Based on consultation with LAPD, evaluate the cumulative demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (facilities, equipment, and officers) to the relevant LAPD facilities. As feasible, evaluate known security features (e.g., security cameras, officers, lights, fencing, gates, etc.) and any other features, which will reduce

the expected cumulative demand for police service. Consider the combined impact of the proposed and related projects and the project's proportional contribution to the cumulative demand.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Require the project applicant to consult with the LAPD's Crime Prevention Section on the design and implementation of a security plan for the proposed project. Consider the following elements:
 - use of private security guards to monitor and patrol the project site during project construction and operation;
 - design entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment;
 - eliminate areas of dead space;
 - provide solid core doors with deadbolt locks to all offices, shops, and hotel units; and
 - provide walls and fencing around parking areas.

3. DATA, RESOURCES, AND REFERENCES

LAPD, Crime Prevention Section, Telephone: (213) 485-3134.

Safety Element

Environmental and Public Facilities Maps (1996):

- Police Department Facilities; and
- Police Department Community Outreach Centers.

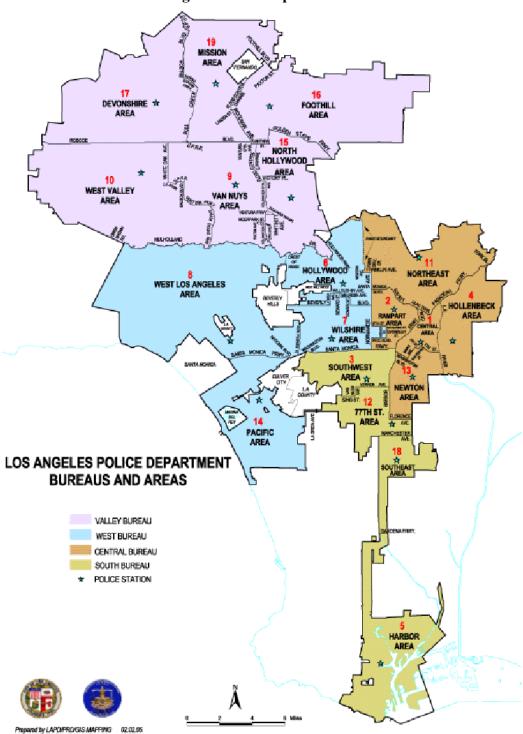


Exhibit K.1-1 Location of Los Angeles Police Department Bureaus and Areas

Exhibit K.1-1, continued KEY TO LOCATION OF LOS ANGELES POLICE BUREAUS/AREAS

CENTRAL BUREAU

251 E. 6th Street, LA, CA 90014 (213) 485-3101

Central Area 251 E. 6th Street, LA, CA 90014 (213) 485-3294

Rampart Area 2710 W. Temple Street, LA, CA 90026 (213) 485-4061

Hollenbeck Area 2111 E. First Street, LA, CA 90033 (213) 485-2942

Northeast Area 3353 San Fernando Road, LA, CA 90065 (213) 485-2563

Newton Area 3400 South Central, LA, CA, 90011 (323) 846-6524

WEST BUREAU

4849 West Venice, Suite 213, LA, CA 90019 (213) 473-0277

Hollywood Area 1358 N. Wilcox Avenue, Hollywood, CA. 90028 (213) 485-4302

Wilshire Area 4861 Venice Boulevard, LA, CA. 90019 (213) 485-4022

West Los Angeles Area 1663 Butler Avenue, LA, CA. 90025 (310) 575-8404 Pacific Area 12312 Culver Boulevard, LA, CA. 90066 (310) 202-4502

VALLEY BUREAU

6240 Sylmar Avenue, Van Nuys, CA 91401 (818) 756-8303

Van Nuys Area 6240 Sylmar Avenue, Van Nuys, CA 91401 (818) 756-8343

West Valley Area 19020 Vanowen Street, Reseda, CA 91335 (818) 756-8542

North Hollywood Area 11640 Burbank Blvd., North Hollywood, CA 91601 (818) 756-8861

Mission Area 11121 Sepulveda Blvd, Mission Hills, CA 91345 (818) 838-9800

Foothill Area 12760 Osborne Street, Pacoima, CA 91331 (818) 756-8861

Devonshire Area 10250 Etiwanda Avenue, Northridge, CA 91325 (818) 756-8285

SOUTH BUREAU

7600 S. Broadway, LA, CA 90003 (213) 485-4251

Southwest Area 1546 Martin Luther King Jr. Boulevard, LA, CA 90062 (213) 485-2582

SOUTH BUREAU (cont.)

Exhibit K.1-1, continued KEY TO LOCATION OF LOS ANGELES POLICE BUREAUS/AREAS

Harbor Area 2175 John S. Gibson Boulevard (310) 548-7605

77th Street Area 7600 S. Broadway, LA, CA 90003 (213) 485-4164

Southeast Area 145 W. 108th Street (213) 485-6914

OTHER FACILITIES

Parker Center 150 N. Los Angeles Street Los Angeles, CA 90012 (213) 485-3266

Air Support Division 555 E. Ramirez Street Los Angeles, CA 90012 (213) 485-2600

LAX SubStation 802 World Way Los Angeles, CA 90045 310-646-2255 Airport Substation (213) 485-5299

Jail Division 150 N. Los Angeles Street Los Angeles, CA 90012 (213) 485-2547

Juvenile Division 150 N. Los Angeles Street Los Angeles, CA 90012 (213) 485-2801 Central Facilities Building 251 E. 6th Street, Room 221 Los Angeles, CA 90014 (213) 485-4091

Motor Transport Division 151 N. San Pedro Street Los Angeles, CA 90012 (213) 485-3495

Police Training and Education 1880 N. Academy Drive Los Angeles, CA 90012 (213) 847-3000

Ahmanson Recruit Training Center 5651 W. Manchester Boulevard Los Angeles, CA 90045 (213) 342-3010

The Edward M. Davis EVOC Firearms/Tactics Training Facility 12001 Blucher Avenue Granada Hills, CA 91344 818-832-3700

Supply Division 555 E. Ramirez Street Los Angeles, CA 90012 (213) 485-2909

Metropolitan Division

Exhibit K.1-2

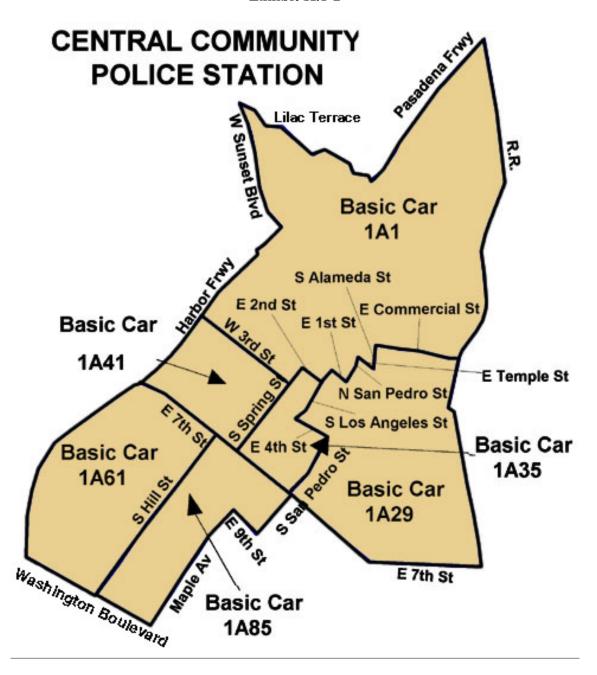
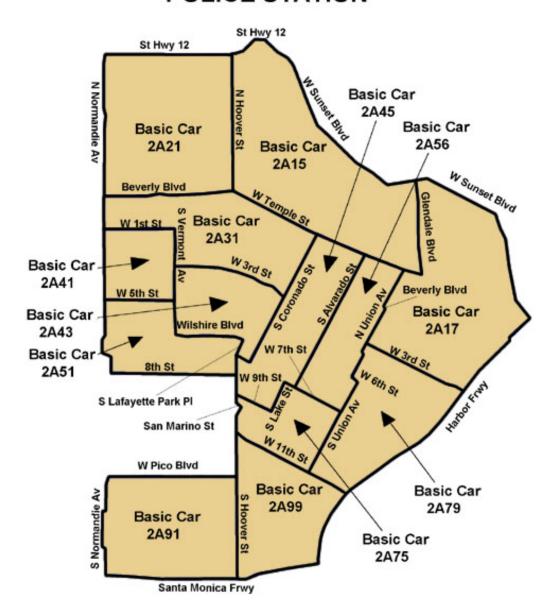
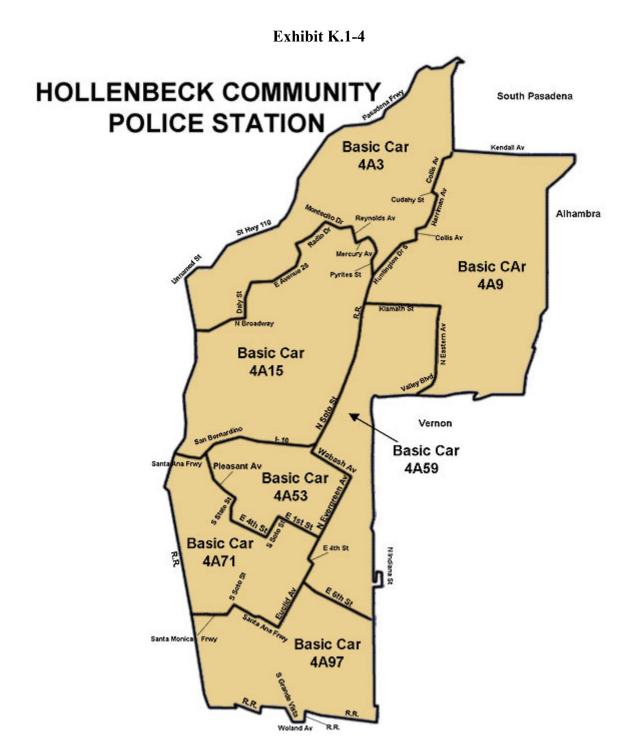


Exhibit K.1-3

RAMPART COMMUNITY POLICE STATION





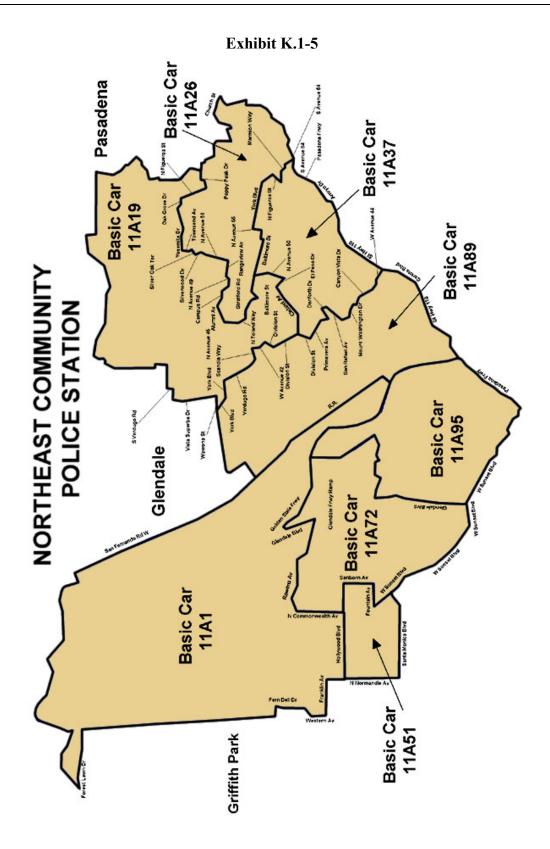
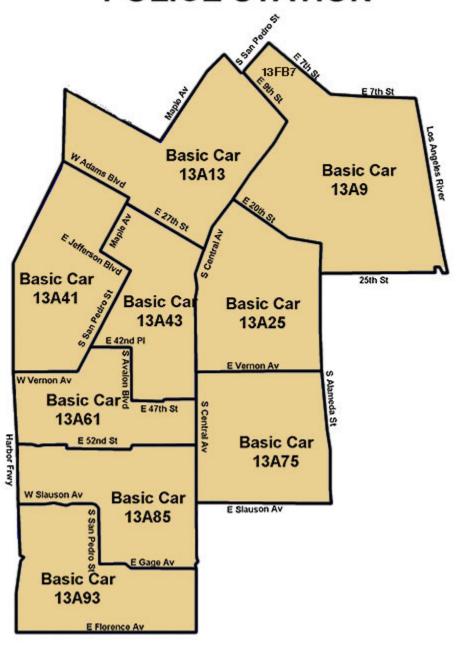
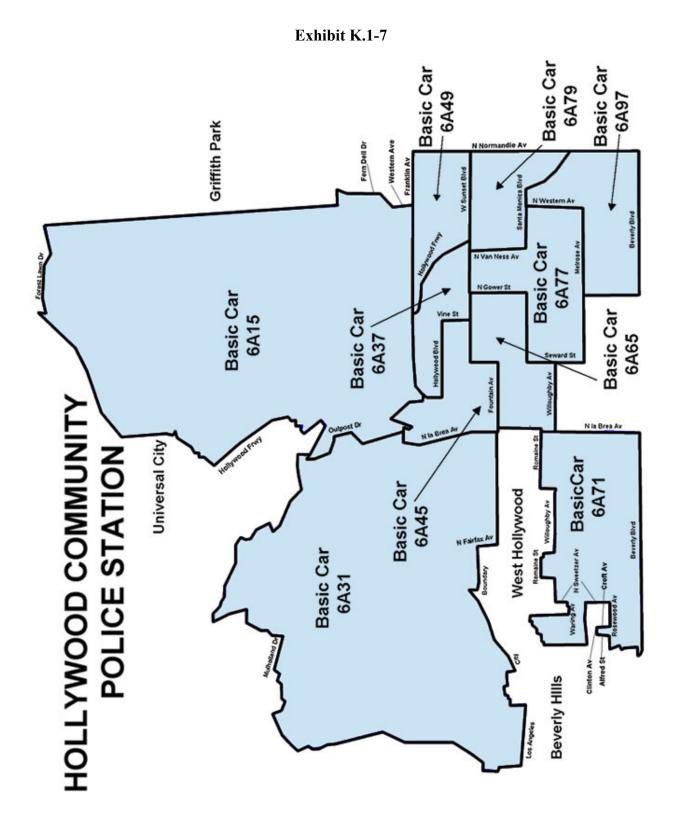


Exhibit K.1-6

NEWTON COMMUNITY POLICE STATION





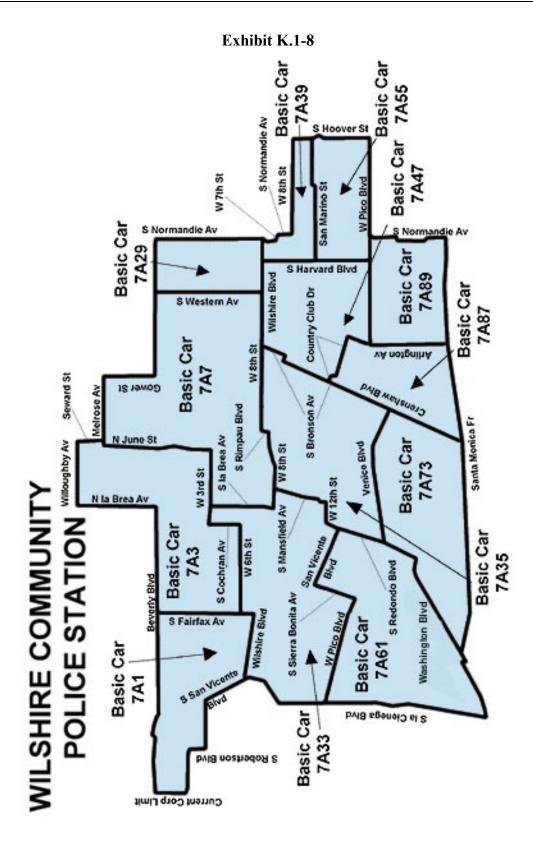


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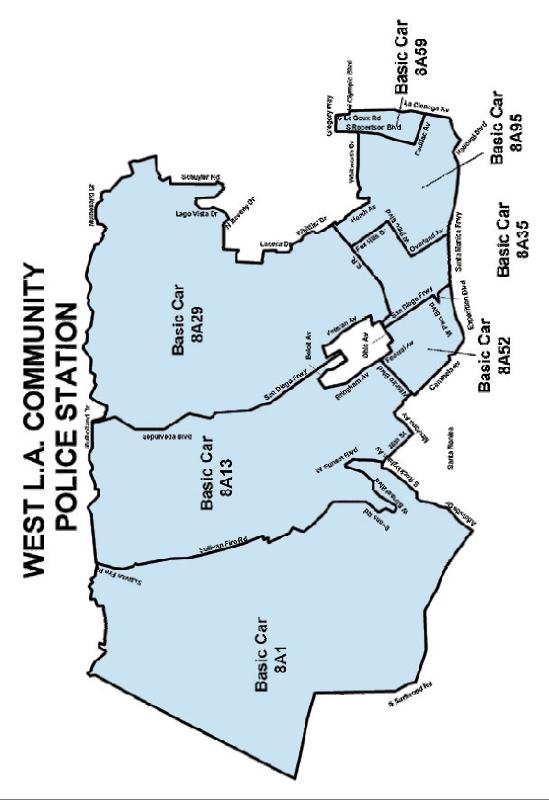


Exhibit K.1-10

PACIFIC COMMUNITY POLICE STATION

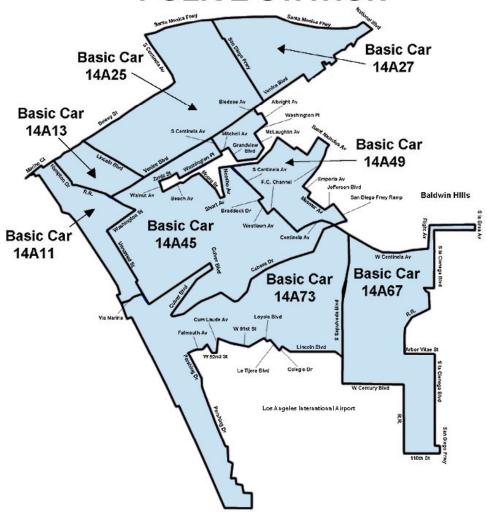


Exhibit K.1-11

VAN NUYS COMMUNITY POLICE STATION

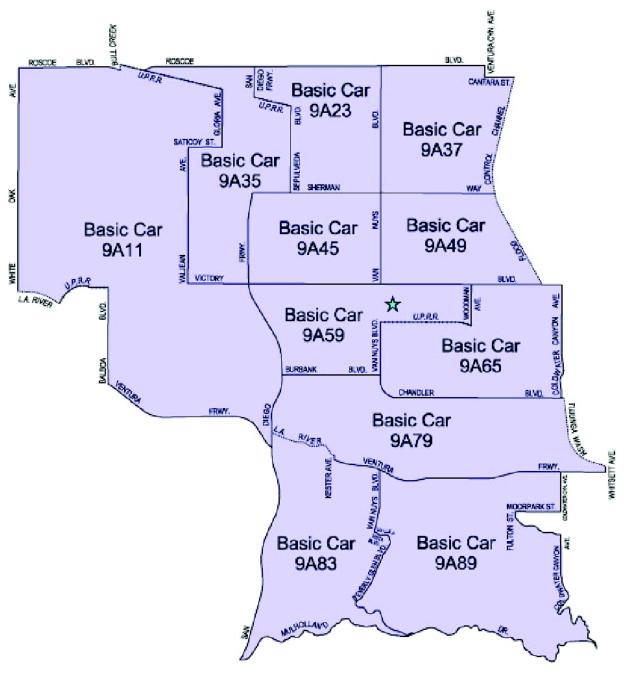


Exhibit K.1-12

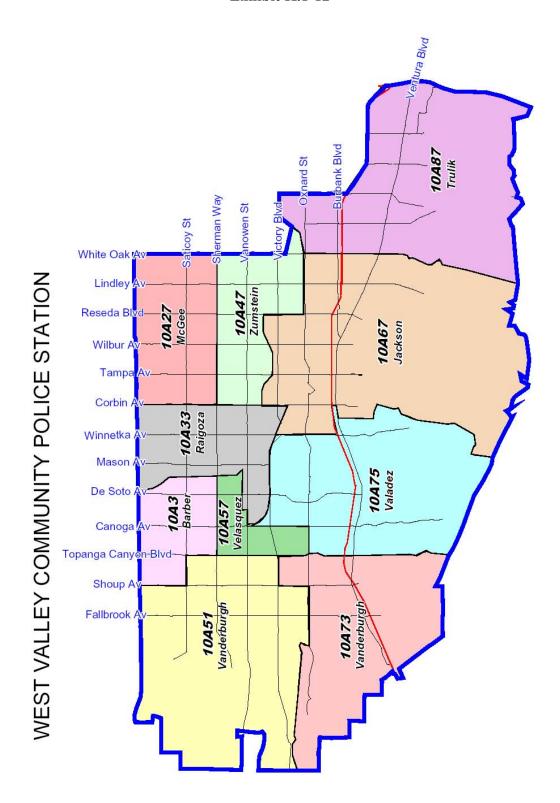


Exhibit K.1-13
NORTH HOLLYWOOD
COMMUNITY POLICE STATION

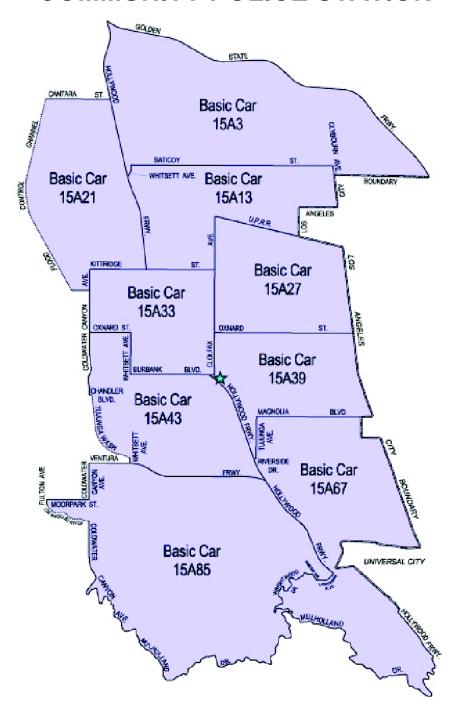
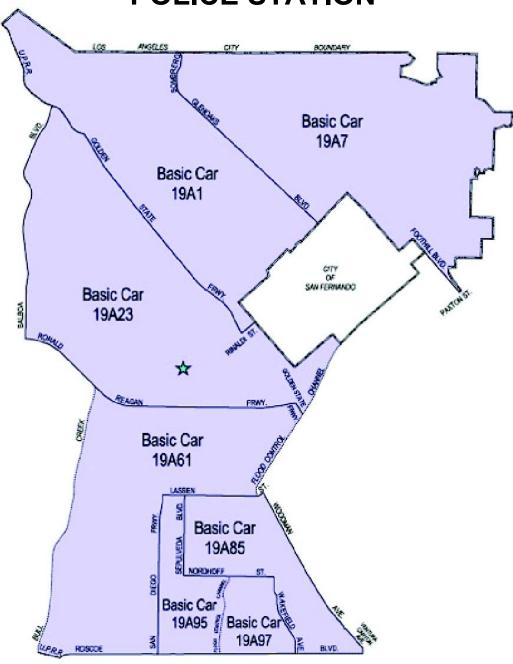
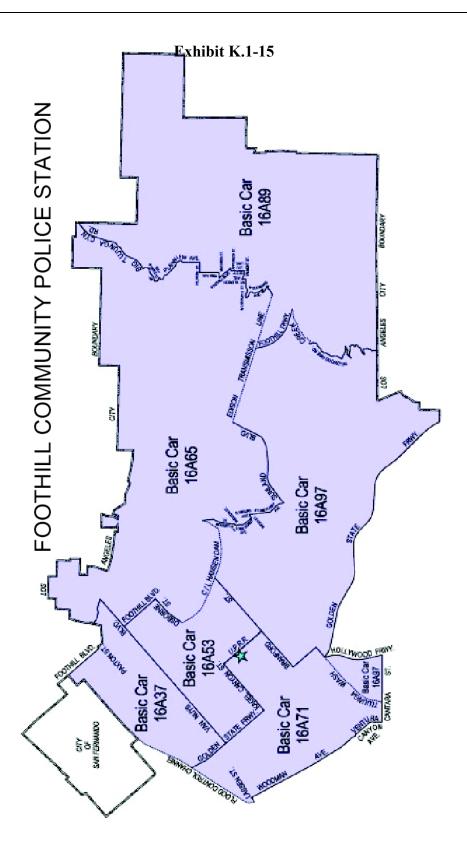
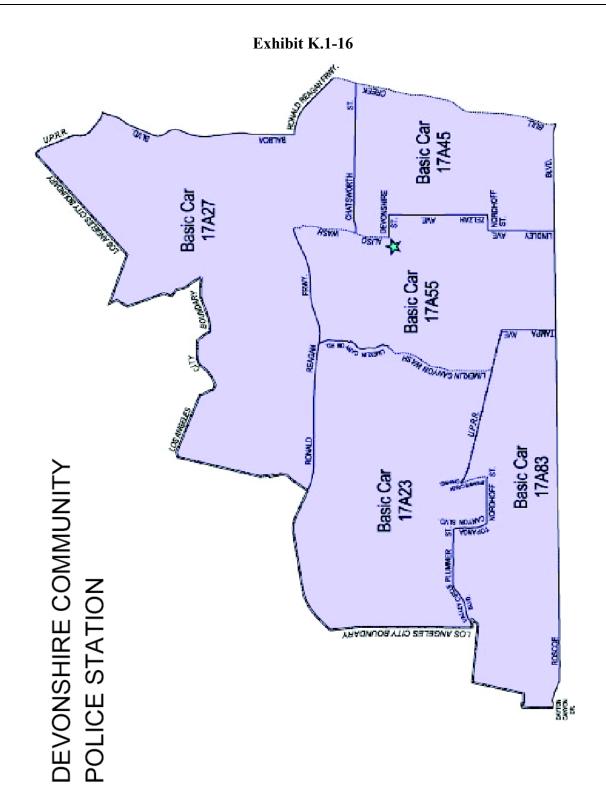


Exhibit K.1-14

MISSION COMMUNITY POLICE STATION







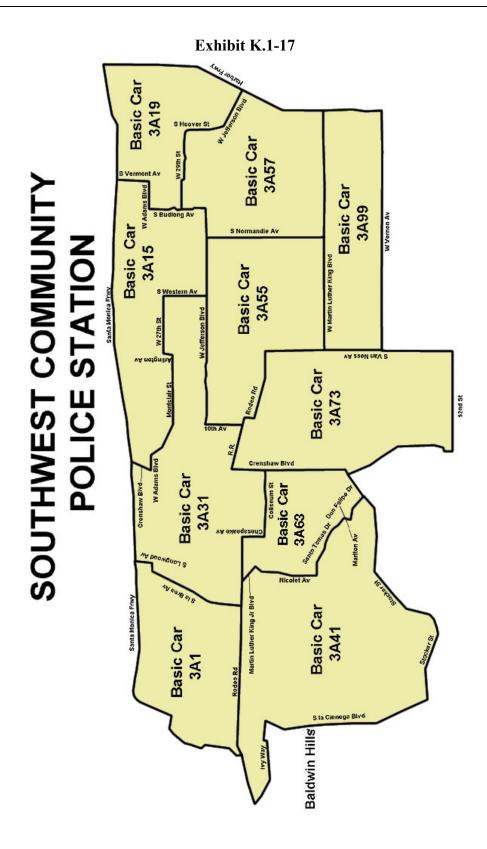
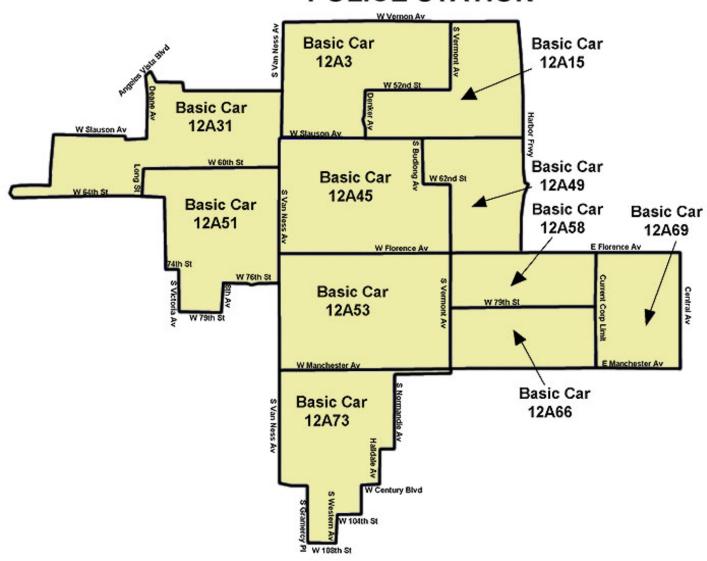


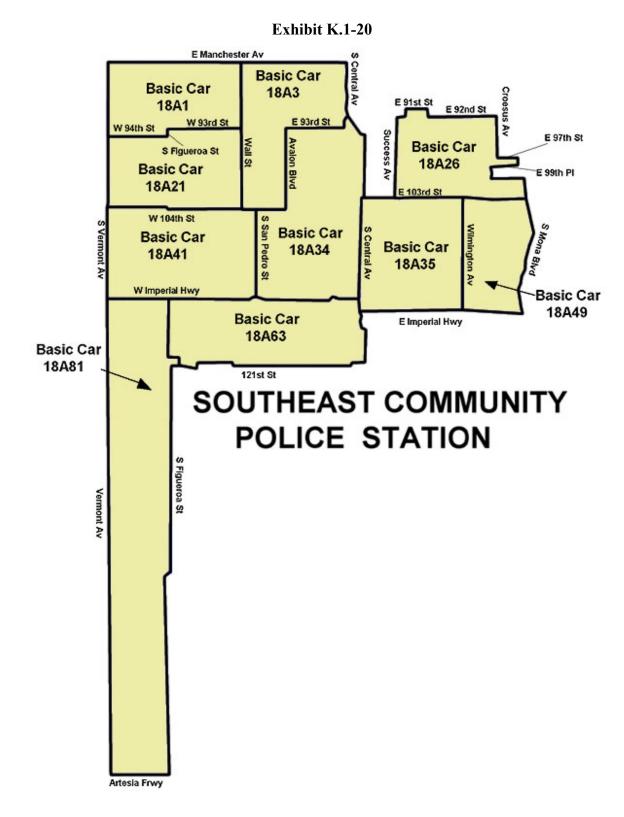
Exhibit K.1-18



Exhibit K.1-19

77th STREET COMMUNITY POLICE STATION





K.2. FIRE PROTECTION & EMERGENCY MEDICAL SERVICES

1. INITIAL STUDY SCREENING PROCESS

Initial Study Checklist Questions

- VII.e): For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- VII.f): For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working within the project area?
- Would the project impair implementation of or physically interfere with an VII.g): adopted emergency response plan or emergency evacuation plan?
- Would the project expose people or structures to a significant risk of loss, injury VII.h): or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
- XIII.a.i): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Introduction В.

Within the City of Los Angeles, fire prevention and suppression services and emergency medical services are provided by the Los Angeles Fire Department (LAFD). The LAFD operates more than 100 fire stations grouped into 18 battalions and three divisions. Equipment includes engines, trucks, paramedic engines, crash units, hazardous materials response and decontamination units, foam carriers, rescue ambulances, helicopters, and boats.

New development projects in the City may increase the demand for fire protection and emergency medical services. The LAFD evaluates new project impacts on a project-by-project basis. Beyond the standards in the Los Angeles Fire Code, consideration is given to project size and components, required fire-flow, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous

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Risk of upset impacts due to potentially hazardous or explosive materials are materials. discussed in F.1. RISK OF UPSET/EMERGENCY PREPAREDNESS.

C. **Screening Criteria**

Would the project be located farther from an engine or truck company than the maximum response distances, based on the project's proposed land use(s), as indicated in the following chart?

Land Use	Maximum Respon	se Distance (miles)
	Engine Company	Truck Company
Neighborhood Land Uses		
Low Density Residential/High Density	1.50	1.50
Residential/Neighborhood		
Regional Land Uses		
Commercial Industrial/Commercial	1.00	1.50
Commercial and Industrial Centers		
High Density Commercial/High Density	0.75	1.00
Industrial		

Source: Los Angeles Fire Code, Los Angeles Municipal Code (LAMC), Section 57.09.07.

- Is the project located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access?
- Does the project involve the use, manufacture or storage of toxic, readilycombustible, or otherwise hazardous materials?
- Would the project's location provide for adequate LAFD access (e.g., adequate street/fire lane width--minimum 20 feet clear and unobstructed with an approved turn around, grade not exceeding 15 percent, dead-ends not exceeding 700 feet)?
- Are there any street intersections with a level of service (LOS) of E or F near the project site that would adversely impact response time?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Fire Protection and Emergency Medical Services, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Fire Protection and Emergency Medical Services from the proposed project.

D. **Evaluation of Screening Criteria**

Review the project description, site characteristics, Exhibit K.2-1 and the following Environmental and Public Facilities Maps:

- Fire Department Truck and Engine Company Service Areas for Neighborhood Land Uses, Regional Land Uses, and Commercial and Industrial Centers in the City of Los Angeles;
- Brush Fire Hazard Areas;
- Selected Wildfire Hazard Areas; and
- Inadequate Fire Hydrant Service Areas.

To calculate the response distance to the nearest engine and truck companies, begin by using the maps to locate the fire stations nearest to the project site. The response distance is the actual travel distance, which would be required, not the direct distance point-to-point. All stations listed in Exhibit K.2-1 are engine companies or Task Forces. All Task Force stations include an engine company and a truck company.

Intersection LOS can be determined through a traffic study (see L.1. INTERSECTION CAPACITY) or through consultation with the Los Angeles Department of Transportation (LADOT). Consider intersections on the path between the fire station and project site, focusing on intersections that provide access to the project.

Also, determine areas with inadequate access in consultation with the LAFD, City Planning Department, and Bureau of Engineering. Finally, check the project description for evidence of use, manufacture or storage of toxic, readily combustible, or otherwise hazardous materials.

2. **DETERMINATION OF SIGNIFICANCE**

Significance Threshold A.

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

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В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Description (including response distances) and map of LAFD facilities that serve the project (for assistance, see Exhibit K.2-1). Identify intersections at LOS E or F that provide access to the project;
- Discussion of fire hydrants and fire-flow levels serving the project site (for assistance, contact the Los Angeles Department of Water and Power (DWP)); and
- Description of existing brush fire potential and existing street facilities (e.g., substandard street width).

Project Impacts

Consider the description of the proposed land use, fire-related needs (e.g., use of hazardous materials), any project design features which would reduce or increase the demand for fire protection services, and whether the project site meets the recommended response time and distance requirements. Also, evaluate the site conditions and surrounding area for substandard street width, adequacy of fire hydrant service, brush fire hazard areas, and hillside conditions. Consult with LAFD's Construction Services Unit to determine the project's effect on fire protection and emergency medical services. Specifically evaluate the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand.

<u>Cumulative Impacts</u>

Identify the related projects, which would be served by the same LAFD facilities as the proposed project. Consider the characteristics of the related projects in terms of: land uses; response time and distance for fire companies; toxic, readily combustible, or otherwise hazardous materials; and site location (substandard street width, adequacy of fire hydrant service, brush fire hazard areas, and hillside conditions). consultation with LAFD's Construction Services Unit, determine the cumulative effect on fire protection and emergency medical services. Specifically evaluate the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Provide and maintain fire-retardant landscaping and/or an irrigated buffer zone;
- Prohibit structures in fire hazard areas;
- Use construction and design features, which reduce fire potential and/or promote containment (e.g., increased spacing between buildings, fire-resistant landscaping); and
- Develop an emergency response plan.

3. DATA, RESOURCES, AND REFERENCES

City of Los Angeles Fire Department, Construction Services Unit, 200 North Main Street, Room 1000, Los Angeles, California 90012; Telephone: (213) 977-6354. Los Angeles Fire Code. www.lafd.org/code.htm

Environmental and Public Facilities Maps (1996):

- Fire Department Truck and Engine Company Service Areas for Neighborhood Land Uses, Regional Land Uses, and Commercial and Industrial Centers in the City of Los Angeles;
- Brush Fire Hazard Areas:
- Selected Wildfire Hazard Areas; and
- Inadequate Fire Hydrant Service Areas.

<u>Fire</u> Station	<u>Address</u>	Equipment	Division	Battalion
1	2230 Pasadena Avenue Los Angeles, CA 90031	Task Force, Rescue Ambulance, Food Services	1	7
2	1962 E. Cesar Chavez Avenue Los Angeles, CA 90033	Task Force, Paramedic Ambulance	1	7 HQ
3	108 N. Freemont Avenue Los Angeles, CA 90012	Task Force, Rescue Ambulance, Bus, Light Utility, Hazardous Materials Response Unit	1 HQ	1
4	800 N. Main Street Los Angeles, CA 90012	Task Force, Squad, Rescue Ambulance, Command Post Utility	1	1
5	8900 S. Emerson Avenue Los Angeles, CA 90045	Task Force, Paramedic Ambulance	2	4 HQ
6	326 N. Virgil Avenue Los Angeles, CA 90004	Engine Company, Paramedic Ambulance, Rescue Ambulance	1	11 HQ
8	11351 Tampa Avenue Northridge, CA 91234	Assessment Engine, Paramedic Engine, Brush Patrol	3	15
9	430 E. 7th Street Los Angeles, CA 90014	Engine Company, Task Force, Rescue Ambulance	1	1 HQ
10	1335 S. Olive Street Los Angeles, CA 90015	Task Force, Rescue Ambulance, Paramedic Ambulance, Food Services	1	1
11	1819 W. 7th Street Los Angeles, CA 90057	Task Force, Paramedic Ambulance, Rescue Ambulance	1	11
12	5921 N. Figueroa Street Los Angeles, CA 90042	Task Force, Paramedic Ambulance	1	2
13	1206 S. Vermont Avenue Los Angeles, CA 90006	Engine Company, Rescue Ambulance	1	11
14	3401 S. Central Avenue Los Angeles, CA 90011	Task Force, Paramedic Ambulance, Rescue Ambulance	2	3
15	915 W. Jefferson Boulevard Los Angeles, CA 90007	Task Force, Rescue Ambulance	2	3
16	2011 N. Eastern Avenue Los Angeles, CA 90032	Assessment Engine, Rescue Ambulance	1	7
17	1601 S. Santa Fe Avenue Los Angeles, CA 90021	Engine Company, Light Force, Paramedic Ambulance, Foam Tender, Hazardous Materials Decontamination Unit	1	1

<u>Fire</u> Station	Address	Equipment	Division	Battalion
18	12050 Balboa Boulevard Los Angeles, CA 91344	Assessment Engine, Rescue Ambulance	3	15
19	12229 Sunset Boulevard Los Angeles, CA 90049	Engine Company, Paramedic Ambulance, Rescue Ambulance	1	9
20	2144 Sunset Boulevard Los Angeles, CA 90026	Task Force, Paramedic Ambulance	1	11
21	1187 E. 52nd Street Los Angeles, CA 90011	Engine Company, Paramedic Ambulance	2	3
23	17281 Sunset Boulevard Pacific Palisades, CA 90272	Assessment Engine, Paramedic Ambulance, Brush Patrol	1	9
24	9411 Wentworth Street Sunland, CA 91040	Assessment Engine. Paramedic Ambulance, Brush Patrol	3	12
25	2927 Whittier Boulevard Los Angeles, CA 90023	Assessment Engine, Rescue Ambulance, Arson Unit, Tunnel Utility	1	7
26	2009 S. Western Avenue Los Angeles, CA 90018	Task Force, Paramedic Ambulance, Rescue Ambulance	2	3
27	1327 N. Cole Avenue Los Angeles, CA 90028	Task Force, Paramedic Ambulance, Rescue Ambulance, Urban Search & Rescue	1	5 HQ
28	11641 Corbin Avenue Porter Ranch, CA 91326	Assessment Light Force, Rescue Ambulance, Brush Patrol	3	15
29	4029 W. Wilshire Boulevard Los Angeles, CA 90010	Task Force, Paramedic Ambulance, Rescue Ambulance, Decon Tender	1	11
33	6406 S. Main Street Los Angeles, CA 90003	Task Force, Paramedic Ambulance, Rescue Ambulance	2 HQ	13
34	3661 7th Avenue Los Angeles, CA 90018	Engine Company, Paramedic Ambulance, Rescue Ambulance	2	3
35	1601 N. Hillhurst Avenue Los Angeles, CA 90027	Task Force, Paramedic Ambulance, Rescue Ambulance, Brush Patrol	1	5
36	<u>Under Construction</u> 1005 N. Gaffey Street, San Pedro, CA 90732		2	6
37	1090 Veteran Avenue Los Angeles, CA 90024	Task Force, Paramedic Ambulance	1	9 HQ

<u>Fire</u> Station	<u>Address</u>	Equipment	Division	Battalion
38	124 E. "I" Street Wilmington, CA 90744	Task Force, Paramedic Ambulance, Haz- Mat Tender	2	6
39	14415 Sylvan Street Van Nuys, CA 91401	Engine Company, Assessment Light Force, Paramedic Ambulance	3	10 HQ
40	330 Ferry Street Terminal Island, CA 90731	Assessment Engine, Rescue Ambulance, Rehab Air Tender	2	6
41	1439 N. Gardner Street Los Angeles, CA 90046	Engine Company, Paramedic Ambulance, Rescue Ambulance, Brush Patrol	1	5
42	2021 Colorado Boulevard Los Angeles, CA 90041	Assessment Engine, Rescue Ambulance	1	2
43	10234 National Boulevard Los Angeles, CA 90034	Engine Company, Paramedic Ambulance	2	18
44	1410 Cypress Avenue Los Angeles, CA 90065	Assessment Engine, Rescue Ambulance, Brush Patrol, Swift Water Rescue, Bicycle Medic	1	2
46	4370 S. Hoover Street Los Angeles, CA 90037	Engine Company, Paramedic Ambulance, Rescue Ambulance,	2	3 HQ
47	4575 Huntington Dr South Los Angeles, CA 90032	Task Force, Paramedic Engine, Brush Patrol	1	7
48	1601 S. Grand Avenue San Pedro, CA 90731	Assessment Engine, Light Force, Rescue Ambulance, Haz-Mat Squad	2	6
49	400 Yacht Street, Berth 194 Wilmington, CA 90744	Assessment Engine, Rescue Ambulance, Fireboats 3 & 4	2	6 HQ
50	3036 Fletcher Drive Los Angeles, CA 90065	Assessment Engine, Light Force, Rescue Ambulance	1	2
51	10435 Sepulveda Boulevard Los Angeles, CA 90045	Assessment Engine, Paramedic Ambulance	2	4
52	4957 Melrose Avenue Los Angeles, CA 90029	Engine Company, Paramedic Ambulance	1	5
55	4455 E. York Boulevard Eagle Rock, CA 90041	Engine Company, Paramedic Ambulance	1	2 HQ
56	2759 Rowena Avenue Los Angeles, CA 90039	Assessment Engine, Paramedic Ambulance, Heavy Rescue	1	2

<u>Fire</u> Station	<u>Address</u>	Equipment	Division	Battalion
57	7800 S. Vermont Avenue Los Angeles, CA 90044	Engine Company, Paramedic Ambulance, Rescue Ambulance	2	13 HQ
58	1556 S. Robertson Boulevard Los Angeles, CA 90035	Task Force, Paramedic Ambulance	2	18
59	11505 Olympic Boulevard Los Angeles, CA 90064	Assessment Engine, Paramedic Ambulance, Rehab Air Tender	1	9
60	5320 Tujunga Avenue North Hollywood, CA 91601	Task Force, Paramedic Ambulance, Rescue Ambulance, Foam Tender	3	14 HQ
61	5821 W. 3rd Street Los Angeles, CA 90036	Task Force, Paramedic Ambulance, Rescue Ambulance	2	18
62	3631 Centinela Avenue Los Angeles, CA 90066	Assessment Engine, Paramedic Ambulance, Swift Water Rescue	2	4
63	1930 Shell Avenue Venice, CA 90291	Task Force, Paramedic Ambulance	2	4
64	118 W. 108th Street Los Angeles, CA 90061	Task Force, Paramedic Ambulance, Rescue Ambulance	2	13
65	1801 E. Century Boulevard Los Angeles, CA 90002	Engine Company, Paramedic Ambulance	2	13
66	1909 W. Slauson Boulevard Los Angeles, CA 90047	Task Force, Paramedic Ambulance, Rescue Ambulance	2	13
68	5023 W. Washington Blvd Los Angeles, CA 90016	Engine Company, Paramedic Ambulance, Rescue Ambulance	2	18 HQ
69	15045 Sunset Boulevard Pacific Palisades, CA 90272	Task Force, Paramedic Ambulance	1	9
70	9861 Reseda Boulevard Northridge, CA 91324	Engine Company, Assessment Light Force, Paramedic Ambulance, Haz-Mat Squad	3	15 HQ
71	107 S. Beverly Glen Blvd Los Angeles, CA 90024	Assessment Engine, Paramedic Ambulance	1	9
72	6811 De Soto Avenue Canoga Park, CA 91303	Task Force, Paramedic Ambulance	3	17 HQ
73	7419 Reseda Boulevard Reseda, CA 91335	Engine Company, Assessment Light Force, Paramedic Ambulance	3	17

<u>Fire</u> Station	Address	Equipment	Division	Battalion
74	7777 Foothill Boulevard Tujunga, CA 91042	Engine Company, Assessment Light Force, Paramedic Ambulance, Brush Patrol	3	12
75	15345 San Fernando Mission Mission Hills, CA 91340	Engine Company, Assessment Light Force, Paramedic Ambulance, Haz-Mat Tender	3	12
76	3111 N. Cahuenga Boulevard Los Angeles, CA 90068	Assessment Engine, Rescue Ambulance	1	5
77	8943 Glenoaks Boulevard Sun Valley, CA 91352	Assessment Engine, Rescue Ambulance	3	12
78	4230 Coldwater Canyon Ave Studio City, CA 91604	Assessment Engine, Paramedic Ambulance	3	14
79	18030 S. Vermont Avenue Gardena, CA 90247	Assessment Engine, Paramedic Ambulance	2	13
80	6911 World Way West Los Angeles, CA 90045	Airport Crash Rescue, Airport Foam	2	4
81	14123 Nordhoff Street Arleta, CA 91331	Assessment Engine, Paramedic Ambulance, Rescue Ambulance	3	12
82	1800 N. Bronson Avenue Los Angeles, CA 90028	Assessment Engine, Paramedic Ambulance	1	5
83	5001 Balboa Boulevard Encino, CA 91316	Assessment Engine, Paramedic Ambulance, Brush Patrol, Water Tender, Emergency	3	10
84	5340 Canoga Avenue Woodland Hills, CA 91364	Lighting Trailer, Medical Supply Trailer Assessment Engine, Paramedic Ambulance, Brush Patrol	3	17
85	1331 W. 253rd Street Harbor City, CA 90710	Task Force, Paramedic Ambulance, Urban Search & Rescue, Medical Supply Trailer, Emergency Lighting Trailer	2	6
86	4305 Vineland Avenue North Hollywood, CA 91602	Assessment Engine, Paramedic Ambulance, Urban Search & Rescue, Swift Water Rescue, Water Tender	3	14
87	10241 Balboa Boulevard Northridge, CA 91324	Assessment Engine, Paramedic Ambulance	3	15
88	5101 N. Sepulveda Boulevard Sherman Oaks, CA 91403	Task Force, Paramedic Ambulance, Urban Search & Rescue, Tractor Company, Command Post Vehicle	3 HQ	10

<u>Fire</u> Station	Address	Equipment	Division	Battalion
89	7063 Laurel Canyon Blvd North Hollywood, CA 91605	Task Force, Paramedic Ambulance, Rescue Ambulance, Rehab Air Tender, Urban Search & Rescue	3	14
90	7921 Woodley Avenue Van Nuys, CA 91406	Task Force, Paramedic Ambulance	3	10
91	14430 Polk Street Sylmar, CA 91342	Assessment Engine, Paramedic Ambulance, Rescue Ambulance	3	12
92	10556 W. Pico Boulevard Los Angeles, CA 90064	Engine Company, Assessment Light Force, Paramedic Ambulance	2	18
93	19059 Ventura Boulevard Tarzana, CA 91356	Task Force, Paramedic Ambulance	3	17
94	4470 Coliseum Street Los Angeles, CA 90016	Task Force, Paramedic Ambulance, Rescue Ambulance, Brush Patrol	2	18
95	10010 International Road Los Angeles, CA 90045	Task Force, Paramedic Ambulance, Haz- Mat Squad	2	4
96	21800 Marilla Street Chatsworth, CA 91311	Engine Company, Assessment Light Force, Paramedic Ambulance	3	15
97	8021 Mulholland Drive Los Angeles, CA 90046	Assessment Engine, Paramedic Ambulance	3	14
98	13035 Van Nuys Boulevard Pacoima, CA 91331	Engine Company, Assessment Light Force, Paramedic Ambulance, Rescue Ambulance, Decon Tender	3	12 HQ
99	14145 Mulholland Drive Beverly Hills, CA 90210	Assessment Engine, Paramedic Ambulance, Brush Patrol, Arson Investigation Unit	3	10
100	6751 Louise Avenue Van Nuys, CA 91406	Engine Company, Paramedic Ambulance, Foam Tender, Swift Water Rescue	3	17
101	1414 25th Street San Pedro, CA 90732	Engine Company, Paramedic Ambulance, Foam Tender	2	6
102	13200 Burbank Boulevard Van Nuys, CA 91401	Light Force, Paramedic Ambulance	3	14
103	18143 Parthenia Street Northridge, CA 91324	Assessment Engine, Paramedic Ambulance	3	15
104	8349 Winnetka Avenue Canoga Park, CA 91306	Engine Company, Paramedic Ambulance	3	15

<u>Fire</u> Station	Address	Equipment	Division	Battalion
105	6345 Fallbrook Avenue Woodland Hills, CA 91364	Engine Company, Assessment Light Force, Paramedic Ambulance	3	17
106	23004 Roscoe Boulevard West Hills, CA 91304	Assessment Engine, Rescue Ambulance, Fuel Tender	3	17
107	20225 Devonshire Street Chatsworth, CA 91311	Engine Company, Paramedic Ambulance	3	15
108	12520 Mulholland Drive Beverly Hills, CA 90210	Assessment Engine, Rescue Ambulance	3	14
109	16500 Mulholland Drive Los Angeles, CA 90049	Assessment Engine, Rescue Ambulance, Brush Patrol	3	10
110	2945 Miner St. Berth 44-A San Pedro, CA 90731	Fireboats & SCUBA Operations	2	6
111	954 S. Seaside Avenue, Berth 260 San Pedro, CA 90731	Fireboat	2	6
112	444 South Harbor Blvd. San Pedro, CA 90731	Engine Company, Paramedic Ambulance, Fireboats	2	6
114	8060 Balboa Place Van Nuys, CA 91406	Air Operations, Crash Rescue, Airport Foam	3	10

HQ means Headquarters

Source: LAFD, 1994 & 2003. 2006.

K.3. PUBLIC SCHOOLS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

Within the City of Los Angeles, the Los Angeles Unified School District (LAUSD) provides public education for over 900,000 total students in all programs. The school district educates students in grades K-12 at 557 schools. There are 429 elementary schools; 76 middle schools; and 52 high schools. The LAUSD also offers a number of other schools and centers. Additionally, the LAUSD provides public education partially or entirely within 26 incorporated Los Angeles County cities.

School service needs are related to the size of the residential population, the geographic area served, and community characteristics. Projects that affect these factors (e.g. by increasing residential population in an area) may increase the demand for public school facilities.

C. Screening Criteria

Would the project result in a net increase of at least 75 residential units, 100,000 square feet (sf) of commercial floor area or 200,000 sf of industrial floor area?

A "yes" response to the preceding question indicates further study in an expanded Initial Study,

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For an accounting of the number see LAUSD website at www.lausd.k12.ca/lausd/offices/office-of-Communications/and look for fingertip facts. LAUSD, fingertip facts: 2002-2003, December 2002

Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Public Schools, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Public Schools from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and determine the type of land use(s) proposed (i.e., commercial, industrial, residential), and the size of the project (i.e., number of units, square footage). Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project buildout compared to the
 expected level of service available. Consider, as applicable, scheduled improvements to
 LAUSD services (facilities, equipment and personnel) and the project's proportional
 contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Identify the name, location and description of schools serving the project site (including capacity, enrollment and operating characteristics). Use Exhibits K.3-1 through K.3-9, or contact LAUSD Master Planning & Demographics Branch, Office of the Chief Facilities Executive for assistance and to confirm the accuracy of data; and
- Describe the population and geographic area served, as well as community characteristics.

Project Impacts

Review the description of the project and surrounding area. Determine the net population increase resulting from the project, and identify the public schools that would be used by the project residents. LAUSD has prepared student generation factors in order to estimate the number of students expected from various residential development (reproduced in Exhibit K.3-10). Evaluate the demand for public schools anticipated at the time of project buildout, compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion, or addition) to schools serving the project and the project's proportional contribution to the demand. As necessary, consult with the LAUSD. Evaluate project features, which would reduce the demand for services (e.g., on-site school facilities or direct support to the LAUSD).

Cumulative Impacts

Identify the related projects, which would be served by the same schools as the proposed project. Consider the characteristics of the related projects in terms of size, location, and type of land uses. Determine the net population increase resulting from the related projects. As above, evaluate the cumulative demand for services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion, or addition). As necessary, consult with LAUSD. As feasible, evaluate known features of the related projects (e.g., on-site school facilities or direct support to the LAUSD), which would reduce the expected cumulative demand for public

education services. Consider the combined impact of the proposed and related projects and the project's proportional contribution to the cumulative demand for public education services.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Provide on-site school amenities; and
- Provide direct support to the LAUSD, including land, equipment, funding, etc. Facilities Office of the Chief Executive Master Planning & Demographics Branch.

3. DATA, RESOURCES, AND REFERENCES

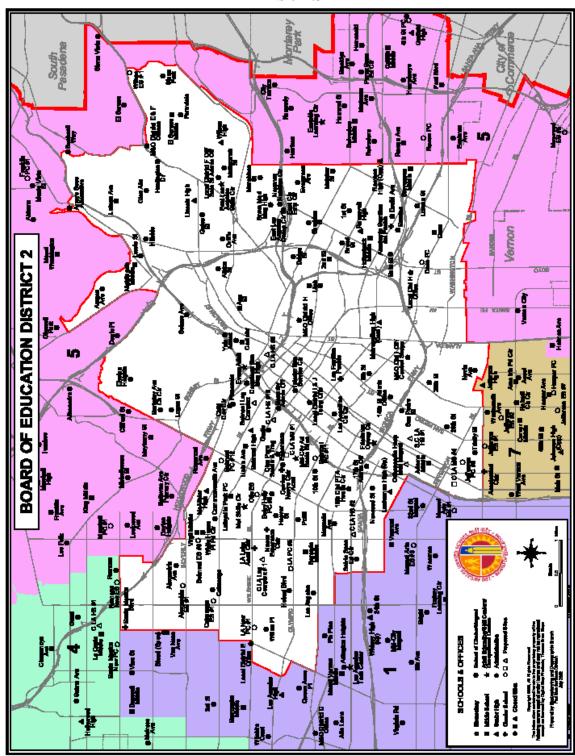
LAUSD, 355 S. Grand Ave., 31st FLR. Los Angeles, 90012; can be contacted at: (213) 633-7606 or http://www.lausd.net.

Environmental and Public Facilities Maps (1996):

- Elementary Schools;
- Middle Schools; and
- High Schools.

Exhibit K.3-1 **BOARD OF EDUCATION DISTRICT** Inglewood

Exhibit K.3-2



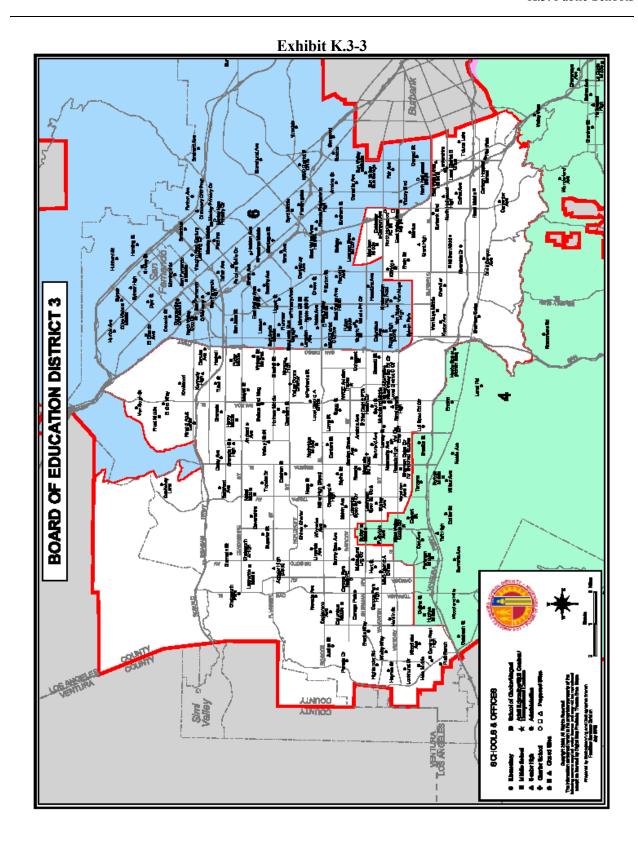


Exhibit K.3-4

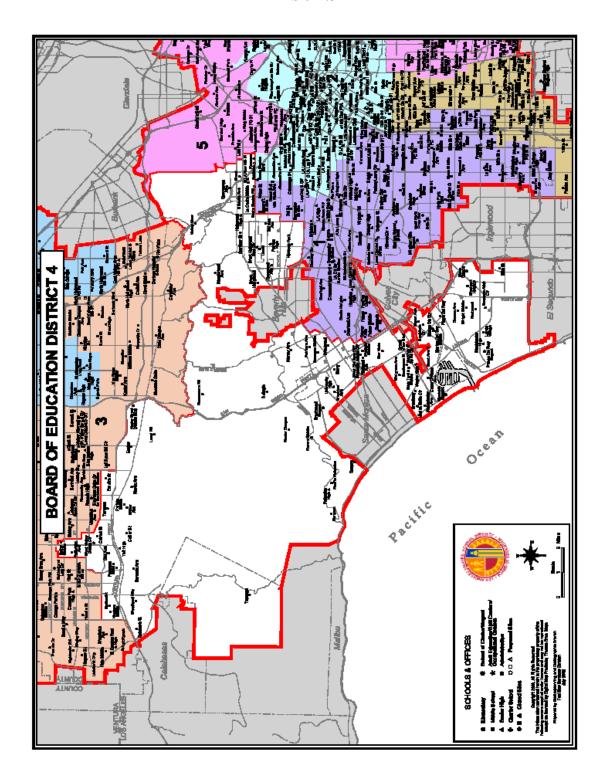
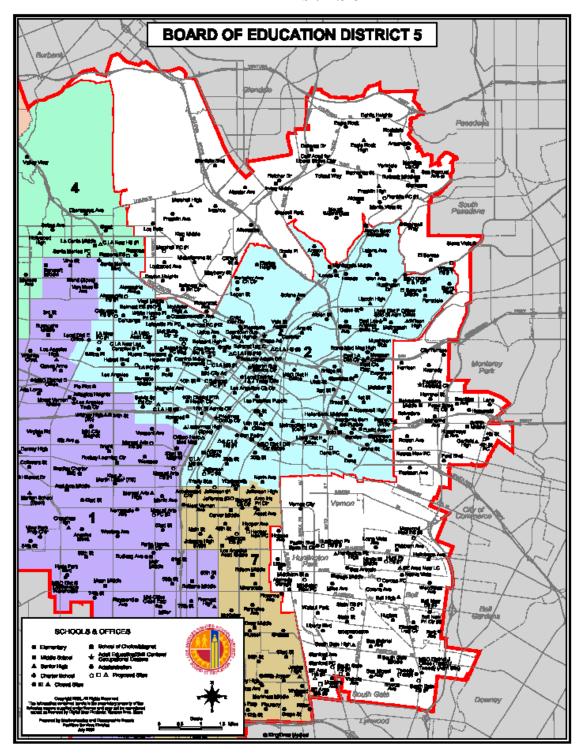


Exhibit K.3-5



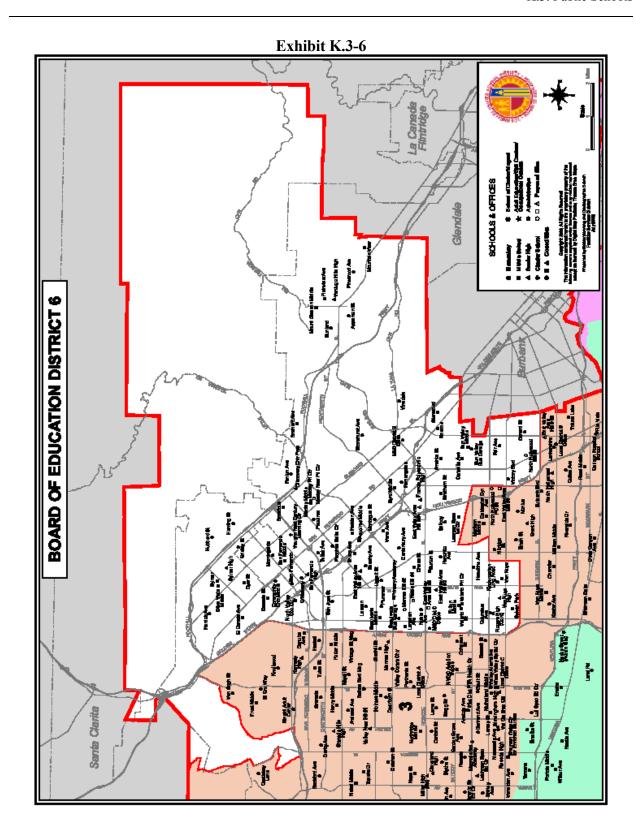


Exhibit K.3-7

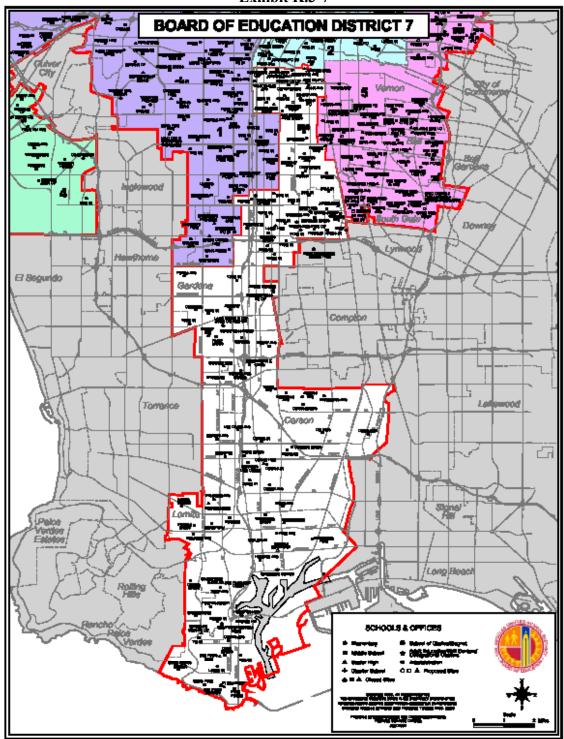


Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Cap	oacity
			2 Semester	Operating
107TH ST EL	147 E 107TH ST LOS ANGELES, CA 90003	4 TRK	1047	1341
109TH ST EL	10915 S MC KINLEY AVE LOS ANGELES, CA 90059	1 TRK	540	540
10TH ST EL	1000 GRATTAN ST LOS ANGELES, CA 90015	3 TRK	1210	1768
112TH ST EL	1265 E 112TH ST LOS ANGELES, CA 90059	1 TRK	821	821
116TH ST EL	11610 STANFORD AVE LOS ANGELES, CA 90059	1 TRK	597	597
118TH ST EL	144 E 118TH ST LOS ANGELES, CA 90061	1 TRK	934	934
122ND ST EL	405 E 122ND ST LOS ANGELES, CA 90061	1 TRK	977	977
135TH ST EL	801 W 135TH ST GARDENA, CA 90247	3 TRK	721	1037
153RD ST EL	1605 W 153RD ST GARDENA, CA 90247	1 TRK	727	727
156TH ST EL	2100 W 156TH ST GARDENA, CA 90249	1 TRK	412	412
15TH ST EL	1527 S MESA ST SAN PEDRO, CA 90731	4 TRK	740	949
186TH ST EL	1581 W 186TH ST GARDENA, CA 90248	1 TRK	962	962
1ST EL	2820 E FIRST ST LOS ANGELES, CA 90033	1 TRK	874	874
20TH ST EL	1353 E 20TH ST LOS ANGELES, CA 90011	3 TRK	728	1063
232ND PL EL	23240 ARCHIBALD AVE CARSON, CA 90745	1 TRK	543	543
24TH ST EL	2055 W 24TH ST LOS ANGELES, CA 90018	3 TRK	1179	1662
28TH ST EL	2807 STANFORD AVE LOS ANGELES, CA 90011	3 TRK	1479	2179
2ND ST EL	1942 E SECOND ST LOS ANGELES, CA 90033	1 TRK	802	802
3RD ST EL	201 S JUNE ST LOS ANGELES, CA 90004	1 TRK	831	831
36 th ST	1771 W. 36 th ST LOS ANGELES, CA 90018		866	
42ND ST EL	4231 FOURTH AVE LOS ANGELES, CA 90008	1 TRK	807	807
49TH ST EL	750 E 49TH ST LOS ANGELES, CA 90011	3 TRK	1315	1947
4TH ST EL	420 S AMALIA AVE LOS ANGELES, CA 90022	3 TRK	849	1235
52ND ST EL	816 W 51ST ST LOS ANGELES, CA 90037	3 TRK	1071	1534
54TH ST EL	5501 S EILEEN AVE LOS ANGELES, CA 90043	4 TRK	567	703
59TH ST EL	5939 SECOND AVE LOS ANGELES, CA 90043	1 TRK	529	529
61ST ST EL	6020 S FIGUEROA ST LOS ANGELES, CA 90003	4 TRK	958	1207
66TH ST EL	6600 S SAN PEDRO ST LOS ANGELES, CA 90003	4 TRK	1124	1420
68TH ST EL	612 W 68TH ST LOS ANGELES, CA 90044	4 TRK	967	1243
6TH AVE EL	3109 SIXTH AVE LOS ANGELES, CA 90018	3 TRK	822	1138
74TH ST EL	2112 W 74TH ST LOS ANGELES, CA 90047	1 TRK	865	865
75TH ST EL	142 W 75TH ST LOS ANGELES, CA 90003	4 TRK	1475	1878
7TH ST EL	1570 W SEVENTH ST SAN PEDRO, CA 90732	1 TRK	580	580
92ND ST EL	9211 GRAPE ST LOS ANGELES, CA 90002	3 TRK	840	1181
93RD ST EL	330 E 93RD ST LOS ANGELES, CA 90003	4 TRK	1263	1609
95TH ST EL	1109 W 96TH ST LOS ANGELES, CA 90044	4 TRK	1249	1575

Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Ca _l	pacity
			2 Semester	Operating
96TH ST EL	1471 E 96TH ST LOS ANGELES, CA 90002	1 TRK	1021	1021
98TH ST EL	5431 W 98TH ST LOS ANGELES, CA 90045	1 TRK	409	409
99TH ST EL	9900 S WADSWORTH AVE LOS ANGELES, CA 90002	1 TRK	799	799
9TH ST EL	820 TOWNE AVE LOS ANGELES, CA 90021	1 TRK	529	529
ALBION EL	322 S AVE 18 LOS ANGELES, CA 90031	1 TRK	585	585
ALDAMA EL	632 N AVE 50 LOS ANGELES, CA 90042	4 TRK	691	875
ALEXANDRIA EL	4211 OAKWOOD AVE LOS ANGELES, CA 90004	3 TRK	1277	1857
ALLESANDRO EL	2210 RIVERSIDE DR LOS ANGELES, CA 90039	3 TRK	437	619
ALTA LOMA EL	1745 VINEYARD AVE LOS ANGELES, CA 90019	3 TRK	790	1131
AMBLER EL	319 E SHERMAN DR CARSON, CA 90746	1 TRK	583	583
AMESTOY EL	1048 W 149TH ST GARDENA, CA 90247	1 TRK	915	915
ANATOLA EL	7364 ANATOLA AVE VAN NUYS, CA 91406	1 TRK	564	564
ANDASOL EL	10126 ENCINO AVE NORTHRIDGE, CA 91325	1 TRK	633	633
ANGELES MESA EL	2611 W 52ND ST LOS ANGELES, CA 90043	1 TRK	811	811
ANN EL	126 E BLOOM ST LOS ANGELES, CA 90012	1 TRK	408	408
ANNALEE EL	19410 S ANNALEE AVE CARSON, CA 90746	1 TRK	594	594
ANNANDALE EL	6125 POPPY PEAK DR LOS ANGELES, CA 90042	1 TRK	459	459
APPERSON EL	10233 WOODWARD AVE SUNLAND, CA 91040	1 TRK	604	604
ARAGON EL	1118 ARAGON AVE LOS ANGELES, CA 90065	3 TRK	615	887
ARLINGTON HTS EL	1717 SEVENTH AVE LOS ANGELES, CA 90019	4 TRK	868	1117
ARMINTA EL	11530 STRATHERN ST NO HOLLYWOOD, CA 91605	3 TRK	808	1181
ASCOT EL	1447 E 45TH ST LOS ANGELES, CA 90011	3 TRK	963	1391
ATWATER EL	3271 SILVER LAKE BLVD LOS ANGELES, CA 90039	1 TRK	573	573
AVALON GARDENS EL	. 13940 S SAN PEDRO ST LOS ANGELES, CA 90061	1 TRK	382	382
BALDWIN HILLS EL	5421 RODEO RD LOS ANGELES, CA 90016	1 TRK	616	616
BANDINI EL	425 N BANDINI ST SAN PEDRO, CA 90731	1 TRK	512	512
BARRETT EL	419 W 98TH ST LOS ANGELES, CA 90003	1 TRK	1295	1295
BARTON HILL EL	423 N PACIFIC AVE SAN PEDRO, CA 90731	4 TRK	713	897
BASSETT EL	15756 BASSETT ST VAN NUYS, CA 91406	4 TRK	1045	1361
BEACHY EL	9757 BEACHY AVE PACOIMA, CA 91331	4 TRK	766	927
BECKFORD EL	19130 TULSA ST NORTHRIDGE, CA 91326	1 TRK	661	661
BEETHOVEN EL	3711 BEETHOVEN ST LOS ANGELES, CA 90066	1 TRK	458	458
BELVEDERE EL	3724 E FIRST ST LOS ANGELES, CA 90063	4 TRK	1250	1621
BERTRAND EL	7021 BERTRAND AVE RESEDA, CA 91335	1 TRK	549	549
BLYTHE EL	18730 BLYTHE ST RESEDA, CA 91335	1 TRK	662	662
BONITA EL	21929 BONITA ST CARSON, CA 90745	1 TRK	787	787
BRADDOCK DRIVE EL	4711 INGLEWOOD BLVD CULVER CITY, CA 90230	1 TRK	722	722

Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Cap	pacity
			2 Semester	Operating
BRAINARD EL	11407 BRAINARD AVE LAKE VIEW TERRACE, CA 91342	1 TRK	425	425
BREED EL	2226 E THIRD ST LOS ANGELES, CA 90033	1 TRK	855	855
BRIDGE EL	605 N BOYLE AVE LOS ANGELES, CA 90033	1 TRK	539	539
BRIGHT EL	1771 W 36TH ST LOS ANGELES, CA 90018	1 TRK	899	899
BROAD AVE EL	24815 BROAD AVE WILMINGTON, CA 90744	4 TRK	993	1269
BROADACRES EL	19424 S BROADACRES AVE CARSON, CA 90746	1 TRK	545	545
BROADOUS EL	12561 FILMORE ST PACOIMA, CA 91331	4 TRK	872	1076
BROADWAY EL	1015 LINCOLN BLVD VENICE, CA 90291	1 TRK	628	628
BROCKTON EL	1309 ARMACOST AVE LOS ANGELES, CA 90025	1 TRK	377	377
BROOKLYN AVE EL	4620 CESAR CHAVEZ AVE LOS ANGELES, CA 90022	1 TRK	774	774
BRYSON EL	4470 MISSOURI AVE SOUTH GATE, CA 90280	3 TRK	800	1175
BUCHANAN EL	5024 BUCHANAN ST LOS ANGELES, CA 90042	3 TRK	603	875
BUDLONG EL	5940 S BUDLONG AVE LOS ANGELES, CA 90044	1 TRK	1517	1517
BURBANK EL	12215 ALBERS ST NO HOLLYWOOD, CA 91607	4 TRK	509	625
BURTON EL	8111 CALHOUN AVE PANORAMA CITY, CA 91402	4 TRK	719	890
BUSHNELL WAY EL	5507 BUSHNELL WAY LOS ANGELES, CA 90042	1 TRK	711	711
CABRILLO EL	732 S CABRILLO AVE SAN PEDRO, CA 90731	4 TRK	574	730
CAHUENGA EL	220 S HOBART BLVD LOS ANGELES, CA 90004	3 TRK	885	1281
CALABASH EL	23055 EUGENE ST WOODLAND HILLS, CA 91364	1 TRK	421	421
CALAHAN EL	18722 KNAPP ST NORTHRIDGE, CA 91324	1 TRK	512	512
CALVERT EL	19850 DELANO ST WOODLAND HILLS, CA 91367	1 TRK	621	621
CAMELLIA EL	7451 CAMELLIA AVE NO HOLLYWOOD, CA 91605	3 TRK	1002	1450
CANFIELD EL	9233 AIRDROME ST LOS ANGELES, CA 90035	1 TRK	446	446
CANOGA PARK EL	7438 TOPANGA CYN BLVD CANOGA PARK, CA 91303	3 TRK	1004	1432
CANTARA EL	17950 CANTARA ST RESEDA, CA 91335	1 TRK	790	790
CANTERBURY EL	13670 MONTAGUE ST PACOIMA, CA 91331	1 TRK	997	997
CANYON EL	421 ENTRADA DR SANTA MONICA, CA 90402	1 TRK	429	429
CAPISTRANO EL	8118 CAPISTRANO AVE CANOGA PARK, CA 91304	1 TRK	590	590
CAROLDALE	22424 CAROLDALE AVE, CARSON CA 90745	1 TRK	987	987
CARPENTER EL	3909 CARPENTER AVE STUDIO CITY, CA 91604	1 TRK	971	971
CARSON EL	161 E CARSON ST CARSON, CA 90745	4 TRK	816	1004
CARTHAY CENTER EL	6351 W OLYMPIC BLVD LOS ANGELES, CA 90048	1 TRK	559	559
CASTELAR EL	840 YALE ST LOS ANGELES, CA 90012	1 TRK	937	937
CASTLE HTS EL	9755 CATTARAUGUS AVE LOS ANGELES, CA 90034	1 TRK	650	650
CASTLEBAY LN EL	19010 CASTLEBAY LN NORTHRIDGE, CA 91326	1 TRK	877	877
CATSKILL EL	23536 CATSKILL AVE CARSON, CA 90745	1 TRK	943	943
CENTURY PK EL	10935 S SPINNING AVE INGLEWOOD, CA 90303	1 TRK	942	942

Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Cap	pacity
			2 Semester	Operating
CHANDLER EL	14030 WEDDINGTON ST VAN NUYS, CA 91401	1 TRK	652	652
CHAPMAN EL	1947 MARINE AVE GARDENA, CA 90249	1 TRK	526	526
CHARNOCK ROAD EL	11133 CHARNOCK RD LOS ANGELES, CA 90034	1 TRK	667	667
CHASE EL	14041 CHASE ST PANORAMA CITY, CA 91402	1 TRK	972	972
CHATSWORTH EL	22005 DEVONSHIRE ST CHATSWORTH, CA 91311	1 TRK	512	512
CHEREMOYA EL	6017 FRANKLIN AVE LOS ANGELES, CA 90028	4 TRK	457	598
CIENEGA EL	2611 S ORANGE DR LOS ANGELES, CA 90016	4 TRK	837	1041
CIMARRON EL	11559 CIMARRON AVE HAWTHORNE, CA 90250	1 TRK	600	600
CITY TERRACE EL	4350 CITY TERRACE DR LOS ANGELES, CA 90063	1 TRK	597	597
CLARA PRIM CENTER-	·			
CLIFFORD EL	2150 DUANE ST LOS ANGELES, CA 90039	1 TRK	241	241
CLOVER EL	11020 CLOVER AVE LOS ANGELES, CA 90034	1 TRK	576	576
COEUR D ALENE EL	810 COEUR D'ALENE AVE VENICE, CA 90291	1 TRK	458	458
COHASSET EL	15810 SATICOY ST VAN NUYS, CA 91406	1 TRK	887	887
COLDWATER CYN EL	6850 COLDWATER CYN AVE NO HOLLYWOOD, CA	3 TRK	1016	1484
COLFAX EL	11724 ADDISON ST NO HOLLYWOOD, CA 91607	1 TRK	594	594
COLISEUM EL	4400 COLISEUM ST LOS ANGELES, CA 90016	1 TRK	450	450
COLUMBUS AVE EL	6700 COLUMBUS AVE VAN NUYS, CA 91405	4 TRK	571	732
COMMONWEALTH EL	215 S COMMONWEALTH AVE LOS ANGELES, CA 90004	3 TRK	609	871
COMPTON EL	1515 E 104TH ST LOS ANGELES, CA 90002	1 TRK	585	585
CORONA EL	3825 BELL AVE BELL, CA 90201	3 TRK	1337	1924
COWAN EL	7615 COWAN AVE LOS ANGELES, CA 90045	1 TRK	588	588
CRESCENT HEIGHTS	1661 S. CRESCENT HEIGHTS, LOS ANGELES, CA 90035		332	332
CRESTWOOD ST EL	1946 W CRESTWOOD ST RANCHO PALOS VERDES, CA 90275	1 TRK	559	559
DACOTAH	1314 DACOTAH ST, LOS ANGELES, CA 90023		NEW	NEW
DAHLIA HTS EL	5063 FLORISTAN AVE LOS ANGELES, CA 90041	1 TRK	434	434
ANUBE EL	11220 DANUBE AVE GRANADA HILLS, CA 91344	1 TRK	491	491
ARBY EL	10818 DARBY AVE NORTHRIDGE, CA 91326	1 TRK	649	649
DAYTON HEIGHTS EL	607 N WESTMORELAND AVE LOS ANGELES, CA 90004	4 TRK	847	1051
DEARBORN EL	9240 WISH AVE NORTHRIDGE, CA 91325	1 TRK	628	628
DEL AMO EL	21228 WATER ST CARSON, CA 90745	1 TRK	574	574
DELEVAN DRIVE EL	4168 W AVE 42 LOS ANGELES, CA 90065	1 TRK	588	588
DENA EL	1314 DACOTAH ST LOS ANGELES, CA 90023	3 TRK	805	1125
DENKER EL	1620 W 162ND ST GARDENA, CA 90247	4 TRK	945	1199
DIXIE CANYON EL	4220 DIXIE CANYON AVE SHERMAN OAKS, CA 91423	1 TRK	697	697
OOLORES EL	22526 DOLORES ST CARSON, CA 90745	1 TRK	916	916
DOMINGUEZ EL	21250 SANTA FE AVE LONG BEACH, CA 90810	1 TRK	767	767

Exhibit K.3-8					
ELEMENTARY					
Name	Address	Calendar	Ca _l	oacity	
			2 Semester	Operating	
DORRIS PLACE EL	2225 DORRIS PL LOS ANGELES, CA 90031	1 TRK	660	660	
DYER EL	14500 DYER ST SYLMAR, CA 91342	4 TRK	954	1230	
EAGLE ROCK EL	2057 FAIR PARK AVE LOS ANGELES, CA 90041	1 TRK	1045	1045	
EASTMAN EL	4112 E OLYMPIC BLVD LOS ANGELES, CA 90023	1 TRK	1573	1573	
EL DORADO EL	12749 EL DORADO AVE SYLMAR, CA 91342	1 TRK	813	813	
ELIZABETH	4811 ELIZABETH ST, CUDAHY, CA 90201	3 TRK	2348		
EL ORO EL	12230 EL ORO WAY GRANADA HILLS, CA 91344	1 TRK	582	582	
EL SERENO EL	3838 ROSEMEAD AVE LOS ANGELES, CA 90032	1 TRK	756	756	
ELYSIAN HEIGHTS EL	1562 BAXTER ST LOS ANGELES, CA 90026	1 TRK	468	468	
EMELITA EL	17931 HATTERAS ST ENCINO, CA 91316	1 TRK	618	618	
ENCINO EL	16941 ADDISON ST ENCINO, CA 91316	1 TRK	665	665	
ERWIN EL	13400 ERWIN ST VAN NUYS, CA 91401	1 TRK	1218	1218	
ESHELMAN EL	25902 ESHELMAN AVE LOMITA, CA 90717	4 TRK	657	768	
ESPERANZA EL	680 LITTLE ST LOS ANGELES, CA 90017	3 TRK	821	1141	
EUCLID EL	806 EUCLID AVE LOS ANGELES, CA 90023	1 TRK	857	857	
EVERGREEN EL	2730 GANAHL ST LOS ANGELES, CA 90033	1 TRK	1263	1263	
FAIR EL	6501 FAIR AVE NO HOLLYWOOD, CA 91606	3 TRK	1263	1821	
AIRBURN EL	1403 FAIRBURN AVE LOS ANGELES, CA 90024	1 TRK	444	444	
FARMDALE EL	2660 RUTH SWIGGETT DR LOS ANGELES, CA 90032	1 TRK	863	863	
ENTON EL	11828 GAIN ST LAKE VIEW TERRACE, CA 91342	OTHER		931	
ERNANGELES EL	12001 ART ST SUN VALLEY, CA 91352	3 TRK	1019	1457	
FIGUEROA EL	510 W 111TH ST LOS ANGELES, CA 90044	3 TRK	722	989	
FISHBURN EL	5701 FISHBURN AVE MAYWOOD, CA 90270	3 TRK	921	1314	
FLETCHER DR EL	3350 FLETCHER DR LOS ANGELES, CA 90065	3 TRK	780	1101	
FLORENCE EL	7211 BELL AVE LOS ANGELES, CA 90001	3 TRK	947	1345	
FLOURNOY EL	1630 E 111TH ST LOS ANGELES, CA 90059	1 TRK	907	907	
FORD BLVD EL	1112 S FORD BLVD LOS ANGELES, CA 90022	1 TRK	1519	1519	
RANKLIN EL	1910 N COMMONWEALTH AVE LOS ANGELES, CA 9002	7 1 TRK	562	562	
FRIES EL	1301 FRIES AVE WILMINGTON, CA 90744	3 TRK	873	1281	
ULLBRIGHT EL	6940 FULLBRIGHT AVE CANOGA PARK, CA 91306	1 TRK	660	660	
GARDEN GROVE EL	18141 VALERIO ST RESEDA, CA 91335	1 TRK	534	534	
GARDENA EL	647 W GARDENA BLVD GARDENA, CA 90247	4 TRK	746	950	
GARDNER EL	7450 HAWTHORN AVE LOS ANGELES, CA 90046	1 TRK	608	608	
GARVANZA EL	317 N AVE 62 LOS ANGELES, CA 90042	4 TRK	573	684	
GATES EL	3333 MANITOU AVE LOS ANGELES, CA 90031	3 TRK	820	1181	
GAULT EL	17000 GAULT ST VAN NUYS, CA 91406	1 TRK	579	579	
GERMAIN EL	20730 GERMAIN ST CHATSWORTH, CA 91311	1 TRK	918	918	

Exhibit K.3-8 ELEMENTARY					
			2 Semester	Operating	
GLASSELL PARK EL	2211 W AVE 30 LOS ANGELES, CA 90065	4 TRK	767	971	
GLEDHILL EL	16030 GLEDHILL ST NORTH HILLS, CA 91343	1 TRK	801	801	
GLEN ALTA EL	3410 SIERRA ST LOS ANGELES, CA 90031	1 TRK	458	458	
GLENFELIZ BLVD EL	3955 GLENFELIZ BLVD LOS ANGELES, CA 90039	1 TRK	695	695	
GLENWOOD EL	8001 LEDGE AVE SUN VALLEY, CA 91352	1 TRK	798	798	
GRAHAM EL	8407 S FIR AVE LOS ANGELES, CA 90001	3 TRK	1004	1487	
GRANADA EL	17170 TRIBUNE ST GRANADA HILLS, CA 91344	1 TRK	625	625	
GRAND VIEW EL	3951 GRAND VIEW BLVD LOS ANGELES, CA 90066	1 TRK	847	847	
GRANT EL	1530 N WILTON PL LOS ANGELES, CA 90028	3 TRK	1090	1575	
GRAPE EL	1940 E 111TH ST LOS ANGELES, CA 90059	1 TRK	764	764	
GRATTS EL	309 LUCAS AVE LOS ANGELES, CA 90017	3 TRK	717	1053	
GRIDLEY EL	1907 EIGHTH ST SAN FERNANDO, CA 91340	3 TRK	815	1208	
GRIFFIN EL	2025 GRIFFIN AVE LOS ANGELES, CA 90031	1 TRK	748	748	
GRIFFITH JOYNER EL	1963 E 103RD ST LOS ANGELES, CA 90002	1 TRK	1201	1201	
GULF EL	828 W "L" ST WILMINGTON, CA 90744	3 TRK	1049	1497	
HADDON EL	10115 HADDON AVE PACOIMA, CA 91331	3 TRK	1071	1554	
HALLDALE EL	21514 HALLDALE AVE TORRANCE, CA 90501	1 TRK	722	722	
HAMASAKI EL	4865 E FIRST ST LOS ANGELES, CA 90022	1 TRK	651	651	
HAMLIN EL	22627 HAMLIN ST CANOGA PARK, CA 91307	1 TRK	591	591	
HAMMEL EL	438 N BRANNICK AVE LOS ANGELES, CA 90063	1 TRK	1101	1101	
HANCOCK PARK EL	408 S FAIRFAX AVE LOS ANGELES, CA 90036	1 TRK	788	788	
HARBOR CITY EL	1508 W 254TH ST HARBOR CITY, CA 90710	3 TRK	570	792	
HARDING EL	13060 HARDING ST SYLMAR, CA 91342	1 TRK	825	825	
HARRISON	3529 CITY TERRACE DRIVE, LOS ANGELES, CA 90063	1 TRK	1455	1455	
HART ST EL	21040 HART ST CANOGA PARK, CA 91303	4 TRK	873	1077	
HASKELL EL	15850 TULSA ST GRANADA HILLS, CA 91344	1 TRK	494	494	
HAWAIIAN EL	540 HAWAIIAN AVE WILMINGTON, CA 90744	4 TRK	1037	1333	
HAYNES EL	6624 LOCKHURST DR WEST HILLS, CA 91307	1 TRK	423	423	
HAZELTINE EL	7150 HAZELTINE AVE VAN NUYS, CA 91405	3 TRK	944	1359	
HELIOTROPE EL	5911 WOODLAWN AVE MAYWOOD, CA 90270	3 TRK	1029	1514	
HERRICK EL	13350 HERRICK AVE SYLMAR, CA 91342	1 TRK	839	839	
HILLCREST DR EL	4041 HILLCREST DR LOS ANGELES, CA 90008	4 TRK	947	1216	
HILLSIDE EL	120 E AVE 35 LOS ANGELES, CA 90031	3 TRK	554	761	
HOBART BLVD EL	980 S HOBART BLVD LOS ANGELES, CA 90006	3 TRK	1457	2103	
HOLMES EL	5108 HOLMES AVE LOS ANGELES, CA 90058	1 TRK	589	589	
HOOPER EL	1225 E 52ND ST LOS ANGELES, CA 90011	3 TRK	1486	2142	
HOOVER EL	2726 FRANCIS AVE LOS ANGELES, CA 90005	3 TRK	1548	2273	

Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Cap	pacity
			2 Semester	Operating
HUBBARD EL	13325 HUBBARD ST SYLMAR, CA 91342	1 TRK	1062	1062
HUGHES EL	4242 CLARA ST CUDAHY, CA 90201	3 TRK	1071	1529
HUMPHREYS EL	500 S HUMPHREYS AVE LOS ANGELES, CA 90022	1 TRK	1046	1046
HUNTINGTON DR EL	4435 N HUNTINGTON DR LOS ANGELES, CA 90032	1 TRK	817	817
HYDE PARK EL	3140 HYDE PARK BLVD LOS ANGELES, CA 90043	4 TRK	884	1133
NDEPENDENCE EL	8435 VICTORIA AVE SOUTH GATE, CA 90280	3 TRK	796	1161
VANHOE EL	2828 HERKIMER ST LOS ANGELES, CA 90039	1 TRK	424	424
IUSTICE EL	23350 JUSTICE ST CANOGA PARK, CA 91304	1 TRK	606	606
KENNEDY EL	4010 E RAMBOZ DRIVE LOS ANGELES, CA 90063	1 TRK	868	868
KENTER CANYON EL	645 N KENTER AVE LOS ANGELES, CA 90049	1 TRK	500	500
KENTWOOD EL	8401 EMERSON AVE LOS ANGELES, CA 90045	1 TRK	521	521
KESTER EL	5353 KESTER AVE VAN NUYS, CA 91411	1 TRK	780	780
KING JR EL	3989 S HOBART BLVD LOS ANGELES, CA 90062	1 TRK	1109	1109
KITTRIDGE EL	13619 KITTRIDGE ST VAN NUYS, CA 91401	3 TRK	906	1294
(NOLLWOOD EL	11822 GERALD AVE GRANADA HILLS, CA 91344	1 TRK	639	639
A SALLE EL	8715 LA SALLE AVE LOS ANGELES, CA 90047	1 TRK	1159	1159
ANAI EL	4241 LANAI RD ENCINO, CA 91436	1 TRK	541	541
ANE EL	1500 CESAR CHAVEZ AVE MONTEREY PARK, CA 91754	1 TRK	576	576
_A NEW #3	1211 SOUTH HOBART BLVD, LOS ANGELES, CA 90006		NEW	NEW
ANGDON EL	8817 LANGDON AVE NORTH HILLS, CA 91343	3 TRK	1125	1672
ANKERSHIM EL	5250 BAKMAN AVE NO HOLLYWOOD, CA 91601	4 TRK	736	940
ASSEN EL	15017 SUPERIOR ST NORTH HILLS, CA 91343	1 TRK	785	785
_ATONA EL	4312 BERENICE AVE LOS ANGELES, CA 90031	3 TRK	419	561
_AUREL EL	925 N HAYWORTH AVE LOS ANGELES, CA 90046	1 TRK	499	499
EAPWOOD EL	19302 LEAPWOOD AVE CARSON, CA 90746	1 TRK	586	586
ELAND EL	2120 S LELAND ST SAN PEDRO, CA 90731	1 TRK	755	755
EMAY EL	17520 VANOWEN ST VAN NUYS, CA 91406	1 TRK	439	439
IBERTY EL	2728 LIBERTY BLVD SOUTH GATE, CA 90280	3 TRK	961	1369
IGGETT EL	9373 MOONBEAM AVE PANORAMA CITY, CA 91402	3 TRK	1010	1443
ILLIAN EL	5909 LILLIAN ST LOS ANGELES, CA 90001	1 TRK	781	781
IMERICK EL	8530 LIMERICK AVE CANOGA PARK, CA 91306	1 TRK	1175	1175
OCKHURST EL	6170 LOCKHURST DR WOODLAND HILLS, CA 91367	1 TRK	615	615
OCKWOOD EL	4345 LOCKWOOD AVE LOS ANGELES, CA 90029	3 TRK	813	1154
OGAN EL	1711 W MONTANA ST LOS ANGELES, CA 90026	4 TRK	1164	1465
LOMA VISTA EL	3629 E 58TH ST MAYWOOD, CA 90270	3 TRK	1242	1785
ORENA EL	1015 S LORENA ST LOS ANGELES, CA 90023	1 TRK	959	959
LORETO EL	3408 ARROYO SECO AVE LOS ANGELES, CA 90065	3 TRK	534	756

Exhibit K.3-8						
ELEMENTARY						
Name	Address	Calendar	Cap	pacity		
			2 Semester	Operating		
LORNE EL	17440 LORNE ST NORTHRIDGE, CA 91325	1 TRK	481	481		
LOS ANGELES EL	1211 S HOBART BLVD LOS ANGELES, CA 90006	3 TRK	907	1300		
LOS FELIZ EL	1740 N NEW HAMPSHIRE AVE LOS ANGELES, CA 90027	1 TRK	849	849		
OYOLA VILLAGE EL	8821 VILLANOVA AVE LOS ANGELES, CA 90045	1 TRK	432	432		
MACLAY PRIMARY	12513 GAIN ST, PACOIMA, CA 91331	4 TRK	300			
MAGNOLIA EL	1626 S ORCHARD AVE LOS ANGELES, CA 90006	3 TRK	1332	1919		
MAIN ST EL	129 E 53RD ST LOS ANGELES, CA 90011	3 TRK	1125	1623		
MALABAR EL	3200 E MALABAR ST LOS ANGELES, CA 90063	1 TRK	1106	1106		
MANCHESTER EL	661 W 87TH ST LOS ANGELES, CA 90044	3 TRK	1242	1785		
MANHATTAN EL	1850 W 96TH ST LOS ANGELES, CA 90047	1 TRK	887	887		
MAR VISTA EL	3330 GRANVILLE AVE LOS ANGELES, CA 90066	1 TRK	760	760		
MARIANNA EL	4215 E GLEASON ST LOS ANGELES, CA 90063	1 TRK	548	548		
MARQUEZ EL	16821 MARQUEZ AVE PACIFIC PALISADES, CA 90272	1 TRK	790	790		
MARVIN EL	2411 MARVIN AVE LOS ANGELES, CA 90016	4 TRK	834	1038		
MAYALL EL	16701 MAYALL ST NORTH HILLS, CA 91343	1 TRK	657	657		
MAYBERRY EL	2414 MAYBERRY ST LOS ANGELES, CA 90026	1 TRK	500	500		
MC KINLEY EL	7812 MC KINLEY AVE LOS ANGELES, CA 90001	1 TRK	1007	1007		
MELROSE EL	731 N DETROIT ST LOS ANGELES, CA 90046	1 TRK	376	376		
MELVIN EL	7700 MELVIN AVE RESEDA, CA 91335	1 TRK	743	743		
MENLO EL	4156 MENLO AVE LOS ANGELES, CA 90037	3 TRK	985	1393		
MEYLER EL	1123 W 223RD ST TORRANCE, CA 90502	4 TRK	1052	1326		
MICHELTORENA EL	1511 MICHELTORENA ST LOS ANGELES, CA 90026	4 TRK	670	811		
MIDDLETON EL	6537 MALABAR ST HUNTINGTON PARK, CA 90255	3 TRK	1393	2044		
MILES EL	6720 MILES AVE HUNTINGTON PARK, CA 90255	3 TRK	1792	2596		
MILLER EL	830 W 77TH ST LOS ANGELES, CA 90044	3 TRK	951	1359		
MIRAMONTE EL	1400 E 68TH ST LOS ANGELES, CA 90001	3 TRK	1533	2253		
MONLUX EL	6051 BELLAIRE AVE NO HOLLYWOOD, CA 91606	1 TRK	762	762		
MONTAGUE EL	13000 MONTAGUE ST PACOIMA, CA 91331	OTHER	8	1132		
MONTARA AVE EL	10018 MONTARA AVE SOUTH GATE, CA 90280	3 TRK	635	897		
MONTE VISTA EL	5423 MONTE VISTA ST LOS ANGELES, CA 90042	4 TRK	698	869		
MORNINGSIDE EL	576 N MACLAY AVE SAN FERNANDO, CA 91340	3 TRK	847	1260		
MOUNTAIN VIEW EL	6410 OLCOTT ST TUJUNGA, CA 91042	1 TRK	775	775		
MT WASHINGTON EL	3981 SAN RAFAEL AVE LOS ANGELES, CA 90065	1 TRK	434	434		
MULTNOMAH EL	2101 N INDIANA AVE LOS ANGELES, CA 90032	1 TRK	564	564		
MURCHISON EL	1501 MURCHISON ST LOS ANGELES, CA 90033	1 TRK	940	940		
NAPA EL	19010 NAPA ST NORTHRIDGE, CA 91324	4 TRK	731	919		
NESTLE EL	5060 NESTLE AVE TARZANA, CA 91356	1 TRK	598	598		

Exhibit K.3-8						
ELEMENTARY						
Name	Address	Calendar	Ca	pacity		
			2 Semester	Operating		
NEVADA EL	22120 CHASE ST CANOGA PARK, CA 91304	1 TRK	788	788		
NEVIN EL	1569 E 32ND ST LOS ANGELES, CA 90011	3 TRK	613	840		
NEWCASTLE EL	6520 NEWCASTLE AVE RESEDA, CA 91335	1 TRK	500	500		
NOBLE EL	8329 NOBLE AVE NORTH HILLS, CA 91343	3 TRK	1211	1799		
NORMANDIE EL	4505 S RAYMOND AVE LOS ANGELES, CA 90037	4 TRK	1162	1483		
NORMONT EL	1001 W 253RD ST HARBOR CITY, CA 90710	4 TRK	503	634		
NORWOOD EL	2020 OAK ST LOS ANGELES, CA 90007	4 TRK	963	1219		
NUEVA VISTA EL	4412 RANDOLPH ST BELL, CA 90201	3 TRK	1017	1470		
O MELVENY EL	728 WOODWORTH ST SAN FERNANDO, CA 91340	4 TRK	726	907		
OSCEOLA EL	14940 OSCEOLA ST SYLMAR, CA 91342	4 TRK	459	550		
OVERLAND EL	10650 ASHBY AVE LOS ANGELES, CA 90064	1 TRK	620	620		
OXNARD EL	10912 OXNARD ST NO HOLLYWOOD, CA 91606	3 TRK	843	1211		
PACIFIC PALISADES	800 VIA DE LA PAZ PACIFIC PALISADES, CA 90272	1 TRK	513	513		
PACOIMA EL	11016 NORRIS AVE PACOIMA, CA 91331	OTHER	1340	1663		
PALMS EL	3520 MOTOR AVE LOS ANGELES, CA 90034	1 TRK	600	600		
PARK AVE EL	5027 LIVE OAK ST CUDAHY, CA 90201	3 TRK	817	1157		
PARK WESTERN EL	1214 PARK WESTERN PL SAN PEDRO, CA 90732	1 TRK	416	416		
PARMELEE EL	1338 E 76TH PL LOS ANGELES, CA 90001	3 TRK	1107	1632		
PARTHENIA EL	16825 NAPA ST NORTH HILLS, CA 91343	4 TRK	747	951		
PIO PICO	1512 So. ARLINGTON AVE, LOS ANGELES, CA. 91042	3 TRK	1655			
PINEWOOD EL	10111 SILVERTON AVE TUJUNGA, CA 91042	1 TRK	936	936		
PLAINVIEW EL	10819 PLAINVIEW AVE TUJUNGA, CA 91042	1 TRK	625	625		
PLASENCIA EL	1321 CORTEZ ST LOS ANGELES, CA 90026	4 TRK	1076	1377		
PLAYA DEL REY EL	12221 JUNIETTE ST CULVER CITY, CA 90230	1 TRK	323	323		
PLUMMER EL	9340 NOBLE AVE NORTH HILLS, CA 91343	3 TRK	1236	1782		
POINT FERMIN EL	3333 KERCKHOFF AVE SAN PEDRO, CA 90731	1 TRK	429	429		
POLITI EL	2481 W 11TH ST LOS ANGELES, CA 90006	3 TRK	871	1259		
POMELO EL	7633 MARCH AVE CANOGA PARK, CA 91304	1 TRK	892	892		
PRESIDENT EL	1465 W 243RD ST HARBOR CITY, CA 90710	1 TRK	699	699		
PURCHE EL	13210 PURCHE AVE GARDENA, CA 90249	1 TRK	732	732		
QUEEN ANNE EL	1212 QUEEN ANNE PL, LOS ANGELES, CA 90019	1 TRK	579	579		
RAMONA EL	1133 N MARIPOSA AVE, LOS ANGELES, CA 90029	3 TRK	1006	1479		
RANCHITO EL	7940 RANCHITO AVE, PANORAMA CITY, CA 91402	3 TRK	548	770		
RAYMOND AVE EL	7511 RAYMOND AVE LOS ANGELES, CA 90044	4 TRK	851	1085		
RESEDA EL	7265 AMIGO AVE RESEDA, CA 91335	1 TRK	601	601		
RICHLAND EL	11562 RICHLAND AVE LOS ANGELES, CA 90064	1 TRK	516	516		
RIO VISTA EL	4243 SATSUMA AVE NO HOLLYWOOD, CA 91602	1 TRK	518	518		

Exhibit K.3-8					
ELEMENTARY					
Name	Address	Calendar	Cap	pacity	
			2 Semester	Operating	
RITTER EL	11108 WATTS AVE LOS ANGELES, CA 90059	1 TRK	493	493	
RIVERSIDE EL	13061 RIVERSIDE DR SHERMAN OAKS, CA 91423	1 TRK	898	898	
ROCKDALE EL	1303 YOSEMITE DR LOS ANGELES, CA 90041	1 TRK	376	376	
ROSCOE EL	10765 STRATHERN ST SUN VALLEY, CA 91352	3 TRK	851	1227	
ROSCOMARE EL	2425 ROSCOMARE RD LOS ANGELES, CA 90077	1 TRK	569	569	
ROSEMONT EL	421 N ROSEMONT AVE LOS ANGELES, CA 90026	3 TRK	1071	1591	
ROSEWOOD EL	503 N CROFT AVE LOS ANGELES, CA 90048	1 TRK	624	624	
ROWAN EL	600 S ROWAN AVE LOS ANGELES, CA 90023	3 TRK	1135	1658	
RUSSELL EL	1263 E FIRESTONE BLVD LOS ANGELES, CA 90001	3 TRK	1017	1450	
SAN ANTONIO ELEM	6222 STATE ST HUNTINGTON PARK, CA 90255	3 TRK	473	633	
SAN FERNANDO EL	1130 MOTT ST SAN FERNANDO, CA 91340	4 TRK	832	1081	
SAN GABRIEL EL	8628 SAN GABRIEL AVE SOUTH GATE, CA 90280	3 TRK	760	1056	
SAN JOSE EL	14928 CLYMER ST MISSION HILLS, CA 91345	1 TRK	786	786	
SAN MIGUEL EL	9801 SAN MIGUEL AVE SOUTH GATE, CA 90280	3 TRK	1033	1471	
SAN PASCUAL EL	815 SAN PASCUAL AVE LOS ANGELES, CA 90042	1 TRK	487	487	
SAN PEDRO EL	1635 S SAN PEDRO ST LOS ANGELES, CA 90015	4 TRK	689	860	
SANTA MONICA COMI	M 1022 N VAN NESS AVE LOS ANGELES, CA 90038	3 TRK	1003	1488	
SATICOY EL	7850 ETHEL AVE NO HOLLYWOOD, CA 91605	1 TRK	851	851	
SATURN EL	5360 SATURN ST LOS ANGELES, CA 90019	4 TRK	735	948	
SELMA EL	6611 SELMA AVE LOS ANGELES, CA 90028	1 TRK	749	749	
SERRANIA EL	5014 SERRANIA AVE WOODLAND HILLS, CA 91364	1 TRK	842	842	
SHARP EL	13800 PIERCE ST PACOIMA, CA 91331	4 TRK	954	1215	
SHENANDOAH EL	2450 SHENANDOAH ST LOS ANGELES, CA 90034	1 TRK	985	985	
SHERIDAN ST EL	416 N CORNWELL ST LOS ANGELES, CA 90033	1 TRK	1506	1506	
SHERMAN OAKS EL	14755 GREENLEAF ST SHERMAN OAKS, CA 91403	1 TRK	1052	1052	
SHIRLEY EL	19452 HART ST RESEDA, CA 91335	1 TRK	989	989	
SHORT EL	12814 MAXELLA AVE LOS ANGELES, CA 90066	1 TRK	646	646	
SIERRA PARK EL	3170 BUDAU AVE LOS ANGELES, CA 90032	4 TRK	1009	1290	
SIERRA VISTA EL	4342 ALPHA ST LOS ANGELES, CA 90032	1 TRK	399	399	
SOLANO EL	615 SOLANO AVE LOS ANGELES, CA 90012	1 TRK	298	298	
SOTO EL	1020 S SOTO ST LOS ANGELES, CA 90023	1 TRK	510	510	
SOUTH PARK EL	8510 TOWNE AVE LOS ANGELES, CA 90003	4 TRK	919	1175	
STAGG EL	7839 AMESTOY AVE VAN NUYS, CA 91406	1 TRK	547	547	
STANFORD EL	2833 ILLINOIS AVE SOUTH GATE, CA 90280	3 TRK	1246	1794	
STATE EL	3211 SANTA ANA ST SOUTH GATE, CA 90280	3 TRK	1105	1585	
STERRY EL	1730 CORINTH AVE LOS ANGELES, CA 90025	1 TRK	455	455	
STONEHURST EL	9851 STONEHURST AVE SUN VALLEY, CA 91352	1 TRK	476	476	

Exhibit K.3-8						
ELEMENTARY						
Name		Calendar	Ca	pacity		
			2 Semester	Operating		
STONER EL	11735 BRADDOCK DR CULVER CITY, CA 90230	1 TRK	706	706		
STRATHERN EL	7939 ST CLAIR AVE NO HOLLYWOOD, CA 91605	3 TRK	965	1378		
SUNLAND EL	8350 HILLROSE ST SUNLAND, CA 91040	1 TRK	761	761		
SUNNY BRAE EL	20620 ARMINTA ST WINNETKA, CA 91306	1 TRK	959	959		
SUNRISE EL	2821 E SEVENTH ST LOS ANGELES, CA 90023	1 TRK	710	710		
SUPERIOR EL	9756 OSO AVE CHATSWORTH, CA 91311	1 TRK	595	595		
SYLMAR EL	13291 PHILLIPPI AVE SYLMAR, CA 91342	3 TRK	816	1157		
SYLVAN PARK EL	6238 NOBLE AVE VAN NUYS, CA 91411	3 TRK	902	1310		
TAPER EL	1824 TAPER AVE SAN PEDRO, CA 90731	1 TRK	761	761		
TARZANA EL	5726 TOPEKA DR TARZANA, CA 91356	1 TRK	629	629		
ΓELFAIR EL	10975 TELFAIR AVE PACOIMA, CA 91331	1 TRK	1320	1320		
TOLAND WAY EL	4545 TOLAND WAY LOS ANGELES, CA 90041	1 TRK	591	591		
TOLUCA LAKE EL	4840 CAHUENGA BLVD NO HOLLYWOOD, CA 91601	1 TRK	803	803		
TOPANGA EL	141 N TOPANGA BLVD TOPANGA, CA 90290	1 TRK	428	428		
OPEKA DR EL	9815 TOPEKA DR NORTHRIDGE, CA 91324	1 TRK	713	713		
TOWNE EL	18924 TOWNE AVE CARSON, CA 90746	1 TRK	583	583		
TRINITY EL	3736 TRINITY ST LOS ANGELES, CA 90011	3 TRK	1279	1866		
ΓULSA EL	10900 HAYVENHURST AVE GRANADA HILLS, CA 91344	1 TRK	616	616		
TWEEDY EL	9515 PINEHURST AVE SOUTH GATE, CA 90280	3 TRK	596	896		
JNION EL	150 S BURLINGTON AVE LOS ANGELES, CA 90057	3 TRK	1434	2020		
JTAH EL	255 N CLARENCE ST LOS ANGELES, CA 90033	1 TRK	825	825		
/ALERIO EL	15035 VALERIO ST VAN NUYS, CA 91405	4 TRK	1092	1418		
/ALLEY VIEW EL	6921 WOODROW WILSON DR LOS ANGELES, CA 90068	1 TRK	288	288		
/AN DEENE EL	826 W JAVELIN ST TORRANCE, CA 90502	1 TRK	569	569		
/AN GOGH EL	17160 VAN GOGH ST GRANADA HILLS, CA 91344	1 TRK	530	530		
/AN NESS EL	501 N VAN NESS AVE LOS ANGELES, CA 90004	4 TRK	472	563		
/AN NUYS EL	6464 SYLMAR AVE VAN NUYS, CA 91401	3 TRK	641	916		
/ANALDEN EL	19019 DELANO ST RESEDA, CA 91335	1 TRK	626	626		
/AUGHN	13330 VAUGHN ST, SAN FERNANDO,CA 91340		1070			
/ENA EL	9377 VENA AVE PACOIMA, CA 91331	1 TRK	685	685		
/ERMONT EL	1435 W 27TH ST LOS ANGELES, CA 90007	4 TRK	1235	1601		
/ERNON CITY EL	2360 E VERNON AVE LOS ANGELES, CA 90058	1 TRK	299	299		
/ICTORIA EL	3320 MISSOURI AVE SOUTH GATE, CA 90280	3 TRK	1151	1676		
/ICTORY EL	6315 RADFORD AVE NO HOLLYWOOD, CA 91606	3 TRK	1089	1557		
/INE EL	955 N VINE ST LOS ANGELES, CA 90038	3 TRK	760	1076		
/INEDALE EL	10150 LA TUNA CANYON RD SUN VALLEY, CA 91352	1 TRK	505	505		
VIRGINIA EL	2925 VIRGINIA RD LOS ANGELES, CA 90016	1 TRK	633	633		

Exhibit K.3-8				
ELEMENTARY				
Name	Address	Calendar	Car	pacity
			2 Semester	Operating
WADSWORTH EL	981 E 41ST ST LOS ANGELES, CA 90011	3 TRK	1173	1711
WALGROVE EL	1630 WALGROVE AVE LOS ANGELES, CA 90066	1 TRK	595	595
WALNUT PARK EL	2642 OLIVE ST HUNTINGTON PARK, CA 90255	3 TRK	1078	1563
WARNER EL	615 HOLMBY AVE LOS ANGELES, CA 90024	1 TRK	741	741
WEEMES EL	1260 W 36TH PL LOS ANGELES, CA 90007	4 TRK	1412	1822
WEIGAND EL	10401 WEIGAND AVE LOS ANGELES, CA 90002	3 TRK	433	595
WELBY EL	23456 WELBY WAY CANOGA PARK, CA 91307	1 TRK	534	534
WEST ATHENS EL	1110 W 119TH ST LOS ANGELES, CA 90044	4 TRK	956	1212
WEST HOLLYWOOD	970 N HAMMOND ST WEST HOLLYWOOD, CA 90069	1 TRK	366	366
WEST VERNON EL	4312 S GRAND AVE LOS ANGELES, CA 90037	3 TRK	1083	1561
WESTERN EL	1724 W 53RD ST LOS ANGELES, CA 90062	1 TRK	1053	1053
WESTMINSTER EL	1010 ABBOT KINNEY BLVD VENICE, CA 90291	1 TRK	564	564
WESTPORT HTS EL	6011 W 79TH ST LOS ANGELES, CA 90045	1 TRK	620	620
WESTWOOD EL	2050 SELBY AVE LOS ANGELES, CA 90025	1 TRK	877	877
WHITE HOUSE PLACE	108 SO. BIMINI PLACE, LOS ANGELES, CA 90004	3 TRK	328	
WHITE POINT EL	1410 SILVIUS AVE SAN PEDRO, CA 90731	1 TRK	548	548
WILBUR EL	5213 CREBS AVE TARZANA, CA 91356	1 TRK	821	821
WILMINGTON PK EL	1140 MAHAR AVE WILMINGTON, CA 90744	1 TRK	1303	1303
WILSHIRE CREST EL	5241 W OLYMPIC BLVD LOS ANGELES, CA 90036	1 TRK	825	825
WILTON PL EL	745 S WILTON PL LOS ANGELES, CA 90005	3 TRK	1051	1519
WINNETKA EL	8240 WINNETKA AVE CANOGA PARK, CA 91306	1 TRK	687	687
WONDERLAND EL	8510 WONDERLAND AVE LOS ANGELES, CA 90046	1 TRK	232	232
WOODCREST EL	1151 W 109TH ST LOS ANGELES, CA 90044	3 TRK	1140	1665
NOODLAKE EL	23231 HATTERAS ST WOODLAND HILLS, CA 91367	1 TRK	710	710
WOODLAND HILLS EL	22201 SAN MIGUEL ST WOODLAND HILLS, CA 91364	1 TRK	746	746
WOODLAWN EL	6314 WOODLAWN AVE BELL, CA 90201	3 TRK	944	1332
YORKDALE EL	5657 MERIDIAN ST LOS ANGELES, CA 90042	1 TRK	691	691

Exhibit K.3-8				
MIDDLE				
Name	Address		Сар	acity
			2 Semester	Operating
ADAMS MS	151 W 30TH ST LOS ANGELES, CA 90007	3 TRK	2400	3360
AUDUBON MS	4120 11TH AVE LOS ANGELES, CA 90008	1 TRK	2400	2400
BANCROFT MS	929 N LAS PALMAS AVE LOS ANGELES, CA 90038	1 TRK	2036	2036
BELVEDERE MS	312 N RECORD AVE LOS ANGELES, CA 90063	1 TRK	2754	2754
BERENDO MS	1157 S BERENDO ST LOS ANGELES, CA 90006	3 TRK	2400	3360
BETHUNE MS	155 W 69TH ST LOS ANGELES, CA 90003	3 TRK	2400	3360
BURBANK MS	6460 N FIGUEROA ST LOS ANGELES, CA 90042	3 TRK	2400	3360
BURROUGHS MS	600 S MC CADDEN PL LOS ANGELES, CA 90005	1 TRK	2400	2400
BYRD MS	9171 TELFAIR AVE SUN VALLEY, CA 91352	4 TRK	2226	2771
CARNEGIE MS	21820 BONITA ST CARSON, CA 90745	1 TRK	2400	2400
CARVER MS	4410 MC KINLEY AVE LOS ANGELES, CA 90011	3 TRK	2394	3333
CLAY MS	12226 S WESTERN AVE LOS ANGELES, CA 90047	1 TRK	2400	2400
COLUMBUS MS	22250 ELKWOOD ST CANOGA PARK, CA 91304	1 TRK	2230	2230
CURTISS MS	1254 E HELMICK ST CARSON, CA 90746	1 TRK	2268	2268
DANA MS	1501 S CABRILLO AVE SAN PEDRO, CA 90731	1 TRK	2400	2400
DODSON MS	28014 MONTEREINA DR SAN PEDRO, CA 90732	1 TRK	2400	2400
DREW MS	8511 COMPTON AVE LOS ANGELES, CA 90001	3 TRK	2400	3360
EDISON MS	6500 HOOPER AVE LOS ANGELES, CA 90001	3 TRK	2400	3360
EL SERENO MS	2839 N EASTERN AVE LOS ANGELES, CA 90032	1 TRK	2544	2544
EMERSON MS	1650 SELBY AVE LOS ANGELES, CA 90024	1 TRK	2003	2003
FLEMING MS	25425 WALNUT ST LOMITA, CA 90717	1 TRK	2400	2400
FOSHAY	3751 SOUTH HARVARD, LOS ANGELES, CA 900218	3 TRK	2838	
FROST MS	12314 BRADFORD PL GRANADA HILLS, CA 91344	1 TRK	2163	2163
FULTON MS	7477 KESTER AVE VAN NUYS, CA 91405	1 TRK	2434	2434
GAGE MS	2880 E GAGE AVE HUNTINGTON PARK, CA 90255	3 TRK	3104	3823
GOMPERS MS	234 E 112TH ST LOS ANGELES, CA 90061	1 TRK	2400	2400
GRIFFITH MS	4765 E FOURTH ST LOS ANGELES, CA 90022	1 TRK	2400	2400
HALE MS	23830 CALIFA ST WOODLAND HILLS, CA 91367	1 TRK	2801	2801
HARTE PREP MS	9301 S HOOVER ST LOS ANGELES, CA 90044	1 TRK	2400	2400
HENRY MS	17340 SAN JOSE ST GRANADA HILLS, CA 91344	1 TRK	1703	1703
HOLLENBECK MS	2510 E SIXTH ST LOS ANGELES, CA 90023	1 TRK	2977	2977
HOLMES MS	9351 PASO ROBLES AVE NORTHRIDGE, CA 91325	1 TRK	1718	1718
IRVING MS	3010 ESTARA AVE LOS ANGELES, CA 90065	1 TRK	2400	2400
KING MS	4201 FOUNTAIN AVE LOS ANGELES, CA 90029	3 TRK	2400	3360
LAWRENCE MS	10100 VARIEL AVE CHATSWORTH, CA 91311	1 TRK	2400	2400
LE CONTE MS	1316 N BRONSON AVE HOLLYWOOD, CA 90028	3 TRK	2400	3360

Exhibit K.3-8				
MIDDLE				
Name	Address	Calendar	Car	acity
			2 Semester	Operating
LOS ANGELES ACAD M	S644 E 56TH ST LOS ANGELES, CA 90011	3 TRK	2400	3360
MACLAY MS	12540 PIERCE AVE PACOIMA, CA 91331	4 TRK	2387	2993
MADISON MS	13000 HART ST NO HOLLYWOOD, CA 91605	1 TRK	2431	2431
MANN MS	7001 S ST ANDREWS PL LOS ANGELES, CA 90047	1 TRK	2400	2400
MARINA DEL REY MS	12500 BRADDOCK DR LOS ANGELES, CA 90066	1 TRK	2018	2018
MARK TWAIN MS	2224 WALGROVE AVE LOS ANGELES, CA 90066	1 TRK	2079	2079
MARKHAM MS	1650 E 104TH ST LOS ANGELES, CA 90002	1 TRK	2400	2400
MILLIKAN MS	5041 SUNNYSLOPE AVE SHERMAN OAKS, CA 91423	1 TRK	2327	2327
MOUNT GLEASON MS	10965 MT GLEASON AVE SUNLAND, CA 91040	1 TRK	2074	2074
MOUNT VERNON MS	4066 W 17TH ST LOS ANGELES, CA 90019	1 TRK	2400	2400
MUIR MS	5929 S VERMONT AVE LOS ANGELES, CA 90044	4 TRK	2400	3360
MULHOLLAND MS	17120 VANOWEN ST VAN NUYS, CA 91406	1 TRK	2400	2400
NIGHTINGALE MS	3311 N FIGUEROA ST LOS ANGELES, CA 90065	1 TRK	2400	2400
NIMITZ MS	6021 CARMELITA AVE HUNTINGTON PARK, CA 90255	3 TRK	3232	3993
NOBEL MS	9950 TAMPA AVE NORTHRIDGE, CA 91324	1 TRK	2400	2400
NORTHRIDGE MS	17960 CHASE ST NORTHRIDGE, CA 91325	1 TRK	2131	2131
OLIVE VISTA MS	14600 TYLER ST SYLMAR, CA 91342	1 TRK	2400	2400
PACOIMA MS	9919 LAUREL CANYON BLVD PACOIMA, CA 91331	1 TRK	2400	2400
PALMS MS	10860 WOODBINE ST LOS ANGELES, CA 90034	1 TRK	2400	2400
PARKMAN MS	20800 BURBANK BLVD WOODLAND HILLS, CA 91367	1 TRK	1742	1742
PEARY MS	1415 W GARDENA BLVD GARDENA, CA 90247	4 TRK	2400	3072
PORTER MS	15960 KINGSBURY ST GRANADA HILLS, CA 91344	1 TRK	2400	2400
PORTOLA MS	18720 LINNET ST TARZANA, CA 91356	1 TRK	2463	2463
REED MS	4525 IRVINE AVE NO HOLLYWOOD, CA 91602	3 TRK	2400	3360
REVERE MS	1450 ALLENFORD AVE LOS ANGELES, CA 90049	1 TRK	2400	2400
SAN FERNANDO MS	130 N BRAND BLVD SAN FERNANDO, CA 91340	1 TRK	2400	2400
SEPULVEDA MS	15330 PLUMMER ST NORTH HILLS, CA 91343	3 TRK	2400	3360
SOUTH GATE MS	4100 FIRESTONE BLVD SOUTH GATE, CA 90280	3 TRK	3376	4110
STEVENSON MS	725 S INDIANA ST LOS ANGELES, CA 90023	1 TRK	2400	2400
SUN VALLEY MS	7330 BAKMAN AVE SUN VALLEY, CA 91352	3 TRK	2400	3360
SUTTER MS	7330 WINNETKA AVE CANOGA PARK, CA 91306	1 TRK	2400	2400
VAN NUYS MS	5435 VESPER AVE VAN NUYS, CA 91411	1 TRK	2400	2400
VIRGIL MS	152 N VERMONT AVE LOS ANGELES, CA 90004	3 TRK	2400	3360
WEBSTER MS	11330 W GRAHAM PL LOS ANGELES, CA 90064	1 TRK	2075	2075
WHITE MS	22102 S FIGUEROA ST CARSON, CA 90745	1 TRK	2400	2400
WILMINGTON MS	1700 GULF AVE WILMINGTON, CA 90744	1 TRK	2400	2400
WRIGHT MS	6550 W 80TH ST LOS ANGELES, CA 90045	1 TRK	2130	2130

Exhibit K.3-8				
SENIOR				
Name	Address	Calendar	Cap	acity
			2 Semester	-
BANNING SH	1527 LAKME AVE WILMINGTON, CA 90744	1 TRK	3314	3314
BELL SH	4328 BELL AVE BELL, CA 90201	3 TRK	3172	4447
BELMONT SH	1575 W 2ND ST LOS ANGELES, CA 90026	3 TRK	3177	4425
BIRMINGHAM SH	17000 HAYNES ST VAN NUYS, CA 91406	1 TRK	3776	3776
CANOGA PARK SH	6850 TOPANGA CYN BLVD CANOGA PARK, CA 91303	1 TRK	2588	2588
CARSON SH	22328 S MAIN ST CARSON, CA 90745	1 TRK	3600	3600
CHATSWORTH SH	10027 LURLINE AVE CHATSWORTH, CA 91311	1 TRK	3600	3600
CLEVELAND SH	8140 VANALDEN AVE RESEDA, CA 91335	1 TRK	3698	3698
CRENSHAW SH	5010 11TH AVE LOS ANGELES, CA 90043	1 TRK	3236	3236
DORSEY SH	3537 FARMDALE AVE LOS ANGELES, CA 90016	1 TRK	2320	2320
EAGLE ROCK HS	1750 YOSEMITE DR LOS ANGELES, CA 90041	1 TRK	2883	2883
EL CAMINO REAL SH	5440 VALLEY CIRCLE BLVD WOODLAND HILLS, CA 91367	1 TRK	3885	3885
FAIRFAX SH	7850 MELROSE AVE LOS ANGELES, CA 90046	1 TRK	3238	3238
FRANKLIN SH	820 N AVE 54 LOS ANGELES, CA 90042	3 TRK	2783	3844
FREMONT SH	7676 S SAN PEDRO ST LOS ANGELES, CA 90003	3 TRK	3450	4853
GARDENA SH	1301 W 182ND ST GARDENA, CA 90248	1 TRK	3600	3600
GARFIELD SH	5101 E SIXTH ST LOS ANGELES, CA 90022	3 TRK	3600	5040
GRANADA HILLS SH	10535 ZELZAH AVE GRANADA HILLS, CA 91344	1 TRK	3905	3905
GRANT SH	13000 OXNARD ST VAN NUYS, CA 91401	1 TRK	3600	3600
HAMILTON SH-COMPLEX	(2955 S ROBERTSON BLVD LOS ANGELES, CA 90034	1 TRK	2813	2813
HOLLYWOOD SH	1521 N HIGHLAND AVE LOS ANGELES, CA 90028	3 TRK	2283	3205
HUNTINGTON PARK SH	6020 MILES AVE HUNTINGTON PARK, CA 90255	3 TRK	3177	4437
JEFFERSON SH	1319 E 41ST ST LOS ANGELES, CA 90011	3 TRK	2551	3542
JORDAN SH	2265 E 103RD ST LOS ANGELES, CA 90002	1 TRK	2449	2449
KENNEDY SH	11254 GOTHIC AVE GRANADA HILLS, CA 91344	1 TRK	3238	3238
LINCOLN SH	3501 N BROADWAY LOS ANGELES, CA 90031	1 TRK	3078	3078
LOCKE SH	325 E 111TH ST LOS ANGELES, CA 90061	1 TRK	3586	3586
LOS ANGELES SH	4650 W OLYMPIC BLVD LOS ANGELES, CA 90019	3 TRK	3508	4931
MANUAL ARTS SH	4131 S VERMONT AVE LOS ANGELES, CA 90037	3 TRK	2908	4050
MARSHALL SH	3939 TRACY ST LOS ANGELES, CA 90027	3 TRK	3586	5045
MONROE SH	9229 HASKELL AVE NORTH HILLS, CA 91343	3 TRK	3600	5040
NARBONNE SH	24300 S WESTERN AVE HARBOR CITY, CA 90710	1 TRK	3524	3524
NO HOLLYWOOD	5231 COLFAX AVE NO HOLLYWOOD, CA 91601	3 TRK	3415	4766
PALISADES CHRTR	15777 BOWDOIN ST PACIFIC PALISADES, CA 90272	1 TRK	2760	2760
POLYTECHNIC SH	12431 ROSCOE BLVD SUN VALLEY, CA 91352	3 TRK	2859	3981

Exhibit K.3-8				
SENIOR				
Name	Address	Calendar	Сар	acity
			2 Semester	Operating
RESEDA SH	18230 KITTRIDGE ST RESEDA, CA 91335	1 TRK	3528	3528
ROOSEVELT SH	456 S MATHEWS ST LOS ANGELES, CA 90033	3 TRK	4246	5420
SAN FERNANDO	11133 O'MELVENY AVE SAN FERNANDO, CA 91340	3 TRK	3841	5181
SAN PEDRO SH	1001 W 15TH ST SAN PEDRO, CA 90731	1 TRK	3514	3514
SOUTH GATE SH	3351 FIRESTONE BLVD SOUTH GATE, CA 90280	3 TRK	3401	4764
SYLMAR SH	13050 BORDEN AVE SYLMAR, CA 91342	1 TRK	3571	3571
TAFT SH	5461 WINNETKA AVE WOODLAND HILLS, CA 91364	1 TRK	3712	3712
UNIVERSITY SH	11800 TEXAS AVE LOS ANGELES, CA 90025	1 TRK	2600	2600
VAN NUYS SH	6535 CEDROS AVE VAN NUYS, CA 91411	3 TRK	4040	5420
VENICE SH	13000 VENICE BLVD LOS ANGELES, CA 90066	1 TRK	3235	3235
VERDUGO HILLS SH	10625 PLAINVIEW AVE TUJUNGA, CA 91042	1 TRK	2411	2411
WASHINGTON PREP SH	10860 S DENKER AVE LOS ANGELES, CA 90047	3 TRK	2831	3940
WESTCHESTER SH	7400 W MANCHESTER AVE LOS ANGELES, CA 90045	1 TRK	3546	3546
WILSON SH	4500 MULTNOMAH ST LOS ANGELES, CA 90032	1 TRK	2921	2921
Exhibit K.3-8				
CONTINUATION HIGH SC	CHOOLS			
Name	Address	Calendar		
ADDAMS HS	16341 DONMETZ ST GRANADA HILLS, CA 91344	1 TRK		

Exhibit K.3-8		
CONTINUATION HIGH SCI	HOOLS	
Name	Address	Calendar
ADDAMS HS	16341 DONMETZ ST GRANADA HILLS, CA 91344	1 TRK
ANGEL'S GATE HS	3200 S ALMA ST SAN PEDRO, CA 90731	1 TRK
AVALON HS	1425 N AVALON BLVD WILMINGTON, CA 90744	1 TRK
BOYLE HEIGHTS HS	544 S MATHEWS ST LOS ANGELES, CA 90033	CONTIN
CENTRAL HS	716 E 14TH ST LOS ANGELES, CA 90021	CONTIN
CHEVIOT HILLS HS	9200 CATTARAUGUS AVE LOS ANGELES, CA 90034	1 TRK
DEL REY HS	8701 PARK HILL DR LOS ANGELES, CA 90045	1 TRK
DOUGLAS HS	10500 LINDLEY AVE NORTHRIDGE, CA 91326	1 TRK
EAGLE TREE CONTN HS	22628 S MAIN ST CARSON, CA 90745	1 TRK
EARHART HS	5355 COLFAX AVE NO HOLLYWOOD, CA 91601	CONTIN
EINSTEIN HS	15938 TUPPER ST NORTH HILLS, CA 91343	CONTIN
ELLINGTON HS	1541 W 110TH ST LOS ANGELES, CA 90047	CONTIN
EVERGREEN HS	13101 DRONFIELD AVE SYLMAR, CA 91342	1 TRK
GREY HS	6510 ETIWANDA AVE RESEDA, CA 91335	1 TRK
HIGHLAND PARK HS	928 N AVE 53 LOS ANGELES, CA 90042	CONTIN
HOPE HS	7840 TOWNE AVE LOS ANGELES, CA 90003	CONTIN
INDEPENDENCE HS	6501 BALBOA BLVD VAN NUYS, CA 91406	1 TRK
INDIAN SPRINGS HS	1441 S BARRINGTON AVE LOS ANGELES, CA 90025	1 TRK

Exhibit K.3-8		
NEW & CONTINU	ATION MULTI-TRACK YEAR-ROUND SCHOOL ELEMENTARY	
Name	Address	
10TH ST	HAZELTINE AVE	
20TH ST	HELIOTROPE AVE	
24TH ST	HILLCREST DRIVE	
28TH ST	HOBART BOULEVARD	
49TH ST	HOOPER AVE	
52ND ST	HOOVER ST	
66TH ST	HUGHES	
68TH ST	HYDE PARK BOULEVARD	
75TH ST	KITTRIDGE ST	

Exhibit K.3-8	
	IULTI-TRACK YEAR-ROUND SCHOOL ELEMENTARY
Name	Address
92ND ST	LANGDON AVE
95TH ST	LANKERSHIM
107TH ST	LATONA AVE
ALDAMA	LIBERTY BOULEVARD
ALEXANDRIA AVE	LILLIAN ST
ALLESANDRO	LOCKWOOD AVE
ALTA LOMA	LOGAN ST
ARAGON AVE	LOMA VISTA AVE
ARLINGTON HEIGHTS	LORETO ST
ARMINTA ST	LOS ANGELES
ASCOT AVE	LOS FELIZ
BASSETT ST	MAGNOLIA
BEACHY AVE	MAIN ST
BROAD AVE	MANCHESTER AVE
BROADOUS	MENLO AVE
BRYSON AVE	MIDDLETON ST
BUCHANAN ST	MILES AVE
CAHUENGA	MILLER
CAMELIA AVE	MIRAMONTE
CANOGA PARK	MONTAGUE ST
CHEREMOYA AVE	MONTARA AVE
CIENEGA	MONTE VISTA ST
COLDWATER CANYON	MORNINGSIDE
COMMONWEALTH AVE.	NAPA ST
CORONA AVE	NEVIN AVE
DAYTON HEIGHTS	NOBLE AVE
DYER ST	NORMONT
ESPERANZA	NORWOOD ST
FAIR AVE	NUEVA VISTA
FENTON AVE	O'MELVENY
FERNANGELES	OSCEOLA ST
FIGUEROA ST	OXNARD ST
FISHBURN AVE	PACOIMA
FLETCHER DRIVE	PARK AVE
FLORENCE AVE	PARMELEE AVE
FRIES AVE	PLACENTIA
GARDENA	PLUMMER
GARVANZA	POLITI

Exhibit K.3-8				
NEW & CONTINUATION MULTI-TRACK YEAR-ROUND SCHOOL ELEMENTARY				
Name	Address			
GATES ST	RAMONA			
GLASSELL PARK	RANCHITO AVE			
GRAHAM	RAYMOND AVE			
GRANT	ROSCOE			
GRATTS	ROSEMONT AVE			
GRIDLEY ST	RUSSELL			
GULF AVE	SAN ANTONIO			
HADDON AVE	SAN FERNANDO			
HAWAIIAN AVE	SAN GABRIEL AVE			
SAN MIGUEL AVE	SANTA MONICA BLVD.			
SATURN ST	SHARP AVE			
STANFORD AVE	STATE ST			
STRATHERN ST	SYLMAR			
SYLVAN PARK	TRINITY ST			
TWEEDY	UNION AVE			
VALERIO ST	VAN NESS AVE			
VAN NUYS	VERMONT AVE			
VICTORIA AVE	VICTORY BOULEVARD			
VINE ST	WADSWORTH AVE			
WALNUT PARK	WEEMES			
WEIGAND AVE	WEST VERNON AVE			
WILTON PLACE	WOODCREST			
WOODLAWN AVE				

NEW & CONTINUATION MULTI-TRACK YEAR-ROUND SCHOOL MIDDLE SCHOOL			
NAME	ADDRESS		
ADAMS	BERENDO		
BETHUNE	BYRD		
CARVER	DREW		
EDISON	GAGE		
LE CONTE	MACLAY		
MOUNT VERNON	NIMITZ		
SOUTH GATE	SUN VALLEY		
VIRGIL			

Exhibit K.3-8		
NEW & CONTINUATION MULTI-TRACK YEAR-ROUND SCHOOL		SENIOR HIGH SCHOOL
NAME	ADDRESS	
BELL	BELMONT	
FRANKLIN	FREMONT	
GARFIELD	HOLLYWOOD	
HUNTINGTON PARK	JEFFERSON	
LOS ANGELES	MANUAL ARTS	

NEW & CONTINUATION MULTI-TRACK YEAR-ROUND SCHOOL SENIOR HIGH SCHOOL					
NAME	ADDRESS				
MARSHALL	MONROE				
POLYTECHNIC	ROOSEVELT				
SAN FERNANDO	SOUTH GATE				
WASHINGTON PREP					

SPAN SCHOOLS (NOT MAGNETS)					
Name	Address	Calendar	Capacity		
			2 Semester	Operating	
CAROLDALE LRNG	22424 CAROLDALE AVE CARSON, CA 90745	1	1433	1433	
ELIZABETH LC	4811 ELIZABETH ST CUDAHY, CA 90201	3	2279	3198	
FOSHAY LC	3751 S HARVARD BLVD LOS ANGELES, CA 90018	3 TRK	2582	3600	
HARRISON EL	3529 CITY TERRACE DR LOS ANGELES, CA 90063	3 TRK	929	1311	
PIO PICO EL	1512 S ARLINGTON AVE LOS ANGELES, CA 90019	3 TRK	1850	2592	
VAUGHN EL	13330 VAUGHN ST SAN FERNANDO, CA 91340	OTHER	8	652	

PRIMARY CENTER				
Name	Address	Calendar	Сар	acity
			2 Semester	Operating
ARCO IRIS PRIMRY CTR	4504 ASCOT AVE LOS ANGELES, CA 90011	3 TRK	140	200
BELL #3 NEW PC	7326 S WILCOX AVE CUDAHY, CA 90201	4 TRK	240	320
BELLEVUE PRIMARY SCH	610 N MICHELTORENA ST LOS ANGELES, CA 90026	4 TRK	275	340
KINDERGARTEN LRN ACD	6555 SYLMAR AVE VAN NUYS, CA 91401	3 TRK	225	305
LAFAYETTE PARK PC	310 S LAFAYETTE PARK PL LOS ANGELES, CA 90057	3 TRK	240	340
MACARTHUR PARK PC	2300 W 7TH ST LOS ANGELES, CA 90057	4 TRK	260	390
MACLAY PRIMARY CTR	12513 GAIN ST PACOIMA, CA 91331	4 TRK	245	305
PARKS/HUERTA PRIMARY	1020 W 58TH PL LOS ANGELES, CA 90044	1 TRK	240	240
PRIMARY ACADEMY	9075 WILLIS AVE PANORAMA CITY, CA 91402	3 TRK	330	490
VALERIO NEW PC	14935 VALERIO ST VAN NUYS, CA 91405	4 TRK	292	332
WHITE HSE PL PRIMARY	108 S BIMINI PL LOS ANGELES, CA 90004	3 TRK	200	300

MAGNET-SELF CONTAINED (ELEM) Name Address Calendar Capacity BALBOA G/HA MAG 17020 LABRADOR ST NORTHRIDGE, CA 91325 1 TRK 677 677 BRADLEY ENV/HUMAN MG 3875 DUBLIN AVE LOS ANGELES, CA 90008 1 TRK 710 710 BRENTWOOD SCI MAG 740 GRETINA GREEN WAY LOS ANGELES, CA 90049 1 TRK 719 710 COMMUNITY MAGNET SCH 11301 BELLAGIO RD LOS ANGELES, CA 90049 1 TRK 424 424 CRESCENT HTS EL 1661 S CRESCENT HTS BLVD LOS ANGELES, CA 90035 1 TRK 396 396 LOMITA MATH/SCI MAG 2211 W 247TH ST LOMITA, CA 90717 4 TRK 1307 1307 OPEN CHARTER MAG SCH 5540 W 77TH ST LOS ANGELES, CA 90045 1 TRK 384 384 PASEO DEL REY NAT SC 7751 PASEO DEL REY PLAYA DEL REY, CA 90293 1 TRK 515 515 S SHORES PER ARTS MG 2000 W 35TH ST SAN PEDRO, CA 90732 1 TRK 419 449 VINTAGE MATH/SCI MAG 5215 OVERDALE DR LOS ANGELES, CA 90043 1 TRK 710 710 SPECIAL EDUCATION	Exhibit K.3-8				
Name Address Calendar Coposity BALBOA G/HA MAG 17020 LABRADOR ST NORTHRIDGE, CA 91325 1 TRK 677 BRADLEY ENV/HUMAN MG 3875 DUBLIN AVE LOS ANGELES, CA 90008 1 TRK 710 710 BRENTWOOD SCI MAG 740 GRETNA GREEN WAY LOS ANGELES, CA 90049 1 TRK 1190 1190 COMMUNITY MAGNET SCH 11301 BELLAGIO RD LOS ANGELES, CA 90049 1 TRK 424 424 COMMUNITY MAGNET SCH 11301 BELLAGIO RD LOS ANGELES, CA 90049 1 TRK 496 396 LOMITA MATH/SCI MAG 2211 W 247TH ST LOMITA, CA 90717 4 TRK 1307 1307 OPEN CHARTER MAG SCH 5540 W 77TH ST LOS ANGELES, CA 90045 1 TRK 430 384 PASEO DEL REY NATS C 7751 PASEO DEL REY PLAYA DEL REY, CA 90293 1 TRK 449 449 VINTAGE MATH/SCI MAG 2260 W 35TH ST SAN PEDRO, CA 90732 1 TRK 449 449 VINTAGE MATH/SCI MAG 5215 OVERDALE DR LOS ANGELES, CA 90043 1 TRK 679 679 WINDSOR M/S AERO MAG 5210 CLINTON ST LOS ANGELES, CA 90004 1 TRK 1 TRK		(ELEM)			
BALBOA G/HA MAG 17020 LABRADOR ST NORTHRIDGE, CA 91325 1 TRK 677 677 BRADLEY ENV/HUMAN MG 3875 DUBLIN AVE LOS ANGELES, CA 90008 1 TRK 710 710 BRENTWOOD SCI MAG 740 GRETNA GREERN WAY LOS ANGELES, CA 90049 1 TRK 1190 1190 COMMUNITY MAGNET SCH 11301 BELLAGIO RD LOS ANGELES, CA 90049 1 TRK 424 424 CRESCENT HTS EL 1661 S CRESCENT HTS BLVD LOS ANGELES, CA 90049 1 TRK 396 396 LOMITA MATHYSCI MAG 2211 W 247TH ST LOMITA. CA 90717 4 TRK 1307 1307 OPEN CHARTER MAG SCH 5540 W 77TH ST LOS ANGELES, CA 90045 1 TRK 384 384 PASEO DEL REY NAT SC 7751 PASEO DEL REY PLAYA DEL REY, CA 90293 1 TRK 515 515 S SHORES PER ARTS MG 2060 W 35TH ST SAN PEDRO, CA 90732 1 TRK 449 449 VINTAGE MATHYSCI MAG 15848 STARE ST NORTH HILLS, CA 91343 1 TRK 679 679 WINDSOR M/S AERO MAG 5215 OVERDALE DR LOS ANGELES, CA 90043 1 TRK 710 710 SPECIAL EDUCATION Name Address Calendar Capacity BANNEKER SP ED CTR 14024 S SAN PEDRO ST LOS ANGELES, CA 90004 1 TRK CARLSON HSP SCH(K-12 10952 WHIPPLE ST NO HOLLYWOOD, CA 91602 1 TRK LEICHMAN BS 2328 ST JAMES PL LOS ANGELES, CA 90007 1 TRK LEICHMAN BP ED CTR 19034 GAULT ST RESEDA, CA 91335 1 TRK LEICHMAN SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LULL SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LULL SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK MCBRIDE SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 1551 MIRANDA ST ENCINO, CA 91335 1 TRK MCBRIDE SP ED CTR 1551 MIRANDA ST ENCINO, CA 91316 1 TRK MCBRIDE SP ED CTR 1552 BUDLONG AVE LOS ANGELES, CA 90006 1 TRK MILLER HS 8218 VANALDEN AVE RESEDA, CA 91335 1 TRK MCBRIDE SP ED CTR 15649 BALBOA BUD VAN NUYS, CA 91406 1 TRK WIDNEY HS 2302 S GRAMERCY PL LOS ANGELES, CA 90007 1 TRK WIDNEY HS 2302 S GRAMERCY PL LOS ANGELES, CA 90018 1 TRK			Calendar		Canacity
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BRENTWOOD SCI MAG	BALBOA G/HA MAG	17020 LABRADOR ST NORTHRIDGE, CA 91325	1 TRK		
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VINTAGE MATH/SCI MAG 15848 STARE ST NORTH HILLS, CA 91343 1 TRK 679 679 WINDSOR M/S AERO MAG 5215 OVERDALE DR LOS ANGELES, CA 90043 1 TRK 710 710 SPECIAL EDUCATION Name Address Calendar Capacity Semester Operating BANNEKER SP ED CTR 14024 S SAN PEDRO ST LOS ANGELES, CA 90061 1 TRK BLEND EL 5210 CLINTON ST LOS ANGELES, CA 90004 1 TRK CARLSON HSP SCH(K-12 10952 WHIPPLE ST NO HOLLYWOOD, CA 91602 1 TRK LANTERMAN HS 2328 ST JAMES PL LOS ANGELES, CA 90007 1 TRK LEICHMAN SP ED CTR 19034 GAULT ST RESEDA, CA 91335 1 TRK LOKRANTZ SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LOWMAN SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LOWMAN SP ED CTR 12827 SATICOY ST NO HOLLYWOOD, CA 91605 1 TRK LULL SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MARLTON SCH 4000 SANTO TOMAS DR LOS ANGELES, CA 90	PASEO DEL REY NAT SC	7751 PASEO DEL REY PLAYA DEL REY, CA 90293	1 TRK	515	515
SPECIAL EDUCATION	S SHORES PER ARTS MG	2060 W 35TH ST SAN PEDRO, CA 90732	1 TRK	449	449
SPECIAL EDUCATION	VINTAGE MATH/SCI MAG	15848 STARE ST NORTH HILLS, CA 91343	1 TRK	679	679
Name Address Calendar Capacity BANNEKER SP ED CTR 14024 S SAN PEDRO ST LOS ANGELES, CA 90061 1 TRK BLEND EL 5210 CLINTON ST LOS ANGELES, CA 90004 1 TRK CARLSON HSP SCH(K-12 10952 WHIPPLE ST NO HOLLYWOOD, CA 91602 1 TRK LANTERMAN HS 2328 ST JAMES PL LOS ANGELES, CA 90007 1 TRK LEICHMAN SP ED CTR 19034 GAULT ST RESEDA, CA 91335 1 TRK LOKRANTZ SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LOWMAN SP ED CTR 12827 SATICOY ST NO HOLLYWOOD, CA 91605 1 TRK LULL SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MARLTON SCH 4000 SANTO TOMAS DR LOS ANGELES, CA 90008 1 TRK MCBRIDE SP ED CTR 3960 CENTINELA AVE LOS ANGELES, CA 90066 1 TRK MILLER HS 8218 VANALDEN AVE RESEDA, CA 91335 1 TRK PACIFIC BL SP ED CTR 5714 PACIFIC BLVD HUNTINGTON PARK, CA 90255 1 TRK PEREZ SP ED CTR 4540 MICHIGAN AVE LOS ANGELES, CA 90002 1 TRK SALVIN SP ED CTR 1925 BUDLONG AVE LOS ANGELES, CA 90007 1 TRK SELLERY SP ED CTR 15805 S BUDLONG AVE GARDENA, CA 90247	WINDSOR M/S AERO MAG	5215 OVERDALE DR LOS ANGELES, CA 90043	1 TRK	710	710
Name Address Calendar Capacity BANNEKER SP ED CTR 14024 S SAN PEDRO ST LOS ANGELES, CA 90061 1 TRK BLEND EL 5210 CLINTON ST LOS ANGELES, CA 90004 1 TRK CARLSON HSP SCH(K-12 10952 WHIPPLE ST NO HOLLYWOOD, CA 91602 1 TRK LANTERMAN HS 2328 ST JAMES PL LOS ANGELES, CA 90007 1 TRK LEICHMAN SP ED CTR 19034 GAULT ST RESEDA, CA 91335 1 TRK LOKRANTZ SP ED CTR 19451 WYANDOTTE ST RESEDA, CA 91335 1 TRK LOWMAN SP ED CTR 12827 SATICOY ST NO HOLLYWOOD, CA 91605 1 TRK LULL SP ED CTR 17551 MIRANDA ST ENCINO, CA 91316 1 TRK MARLTON SCH 4000 SANTO TOMAS DR LOS ANGELES, CA 90008 1 TRK MCBRIDE SP ED CTR 3960 CENTINELA AVE LOS ANGELES, CA 90066 1 TRK MILLER HS 8218 VANALDEN AVE RESEDA, CA 91335 1 TRK PACIFIC BL SP ED CTR 5714 PACIFIC BLVD HUNTINGTON PARK, CA 90255 1 TRK PEREZ SP ED CTR 4540 MICHIGAN AVE LOS ANGELES, CA 90002 1 TRK SALVIN SP ED CTR 1925 BUDLONG AVE LOS ANGELES, CA 90007 1 TRK SELLERY SP ED CTR 15805 S BUDLONG AVE GARDENA, CA 90247					
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SELLERY SP ED CTR 15805 S BUDLONG AVE GARDENA, CA 90247 1 TRK WEST VALLEY SP ED 6649 BALBOA BLVD VAN NUYS, CA 91406 1 TRK WIDNEY HS 2302 S GRAMERCY PL LOS ANGELES, CA 90018 1 TRK	PEREZ SP ED CTR	4540 MICHIGAN AVE LOS ANGELES, CA 90022	1 T	RK	
WEST VALLEY SP ED 6649 BALBOA BLVD VAN NUYS, CA 91406 1 TRK WIDNEY HS 2302 S GRAMERCY PL LOS ANGELES, CA 90018 1 TRK	SALVIN SP ED CTR	1925 BUDLONG AVE LOS ANGELES, CA 90007	1 T	RK	
WIDNEY HS 2302 S GRAMERCY PL LOS ANGELES, CA 90018 1 TRK	SELLERY SP ED CTR	15805 S BUDLONG AVE GARDENA, CA 90247	1 T	RK	
•	WEST VALLEY SP ED	6649 BALBOA BLVD VAN NUYS, CA 91406	1 T	RK	
WILLENBERG SP ED CTR 308 WEYMOUTH AVE SAN PEDRO, CA 90732 1 TRK	WIDNEY HS	2302 S GRAMERCY PL LOS ANGELES, CA 90018	1 T	RK	
	WILLENBERG SP ED CTR	308 WEYMOUTH AVE SAN PEDRO, CA 90732	1 T	RK	

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Exhibit K.3-8				
OPPORTUNITY SCHOOLS/UN	ITS			
Name	Address	Calendar	(Capacity
			Semester	Operating
AGGELER HS 2	21050 PLUMMER ST CHATSWORTH, CA 91311	CONTIN		
MC ALISTER HS-CYESIS	155 N OCCIDENTAL BLVD LOS ANGELES, CA 90026	CONTIN		
RILEY HS-CYESIS	1524 E 103RD ST LOS ANGELES, CA 90022	CONTIN		
SPAN MAGNET				
Name	Address	Calendar	(Capacity
			Semester	Operating
32ND/USC PER ART MAG	822 W 32ND ST LOS ANGELES, CA 90007	1 TRK	734	734
ARROYO SECO MUSM SCI	4805 SYCAMORE TERR LOS ANGELES, CA 90042	1 TRK	542	542
LACES MAG	5931 W 18TH ST LOS ANGELES, CA 90035	1 TRK	1618	1618
MID-CITY MAGNET	3150 W ADAMS BLVD LOS ANGELES, CA 90018	1 TRK	370	370
SOCES MAG	18605 ERWIN ST RESEDA, CA 91335	1 TRK	1780	1780
VALLEY ALTERN MAG	6701 BALBOA BLVD VAN NUYS, CA 91406	1 TRK	576	576
WESTSIDE LDRSHIP MAG	104 ANCHORAGE ST MARINA DEL REY, CA 90292	1 TRK	463	463
MAGNET-SELF CONTAINED S	SENIOR (SS)			
Name	Address	Calendar	(Capacity
			Semester	Operating
BRAVO MEDICAL MAG	1200 N CORNWELL ST LOS ANGELES, CA 90033	1 TRK	1709	1709
DOWNTOWN BUSINESS MAG	1081 W TEMPLE ST LOS ANGELES, CA 90012	1 TRK	671	671
COMMUNITY DAY SCHOOL (T				
Name	Address	Calendar	(Capacity
			Semester	Operating
CDS COOPER	2210 TAPER AVE SAN PEDRO, CA 90731	1 TRK		
CDS JOHNSON	333 E 54TH ST LOS ANGELES, CA 90011	CONTIN		
CDS WEST HOLLYWOOD	1049 FAIRFAX AVE LOS ANGELES, CA 90046	CONTIN		
RAMONA HS	231 S ALMA AVE LOS Angeles, CA 90063	CONTIN		

Exhibit K.3-9

Revised

Los Angeles Unified School District STUDENT GENERATION FACTORS

GENERATION FACTOR

	NO. OF	ELEMI	ENTARY	JUNIOR HIGH	SENIOR	HIGH
TYPE	BEDROOMS	K-6	K-5	7-9 & 6-8	10-12	9-12
Lower Income Areas						
Single-family	2	.3	.26	.15	.15	.2
	3 or more	.6	.52	.25	.25	.34
Townhouse	1	.0	.0	.0	.0	.0
	2	.05	.043	.02	.02	.027
	3 or more	.2	.17	.1	.1	.14
Medium Income Areas						
Single-family	2	.25	.22	.1	.1	.14
Single raining	3 or more	.5	.43	.25	.25	.34
Townhouse	1	.0	.0	.0	.0	.0
	2	.04	.035	.02	.02	.027
	3 or more	.15	.13	.075	.075	.1
Higher Income Areas						
Single-family	2	.2	.17	.1	.1	.14
6.53	3 or more	.4	.35	.2	.2	.27
Townhouse	1	.0	.0	.0	.0	.0
	2	.03	.026	.02	.02	.027
	3 or more	.075	.065	.03	.03	.04
M-14-1- (0 4-1)	,	0	0	0	0	0
Multiple (Rented) (Units that permit children)	1 2	.0 .25	.0 .22	.0 .1	.0 .1	.0 .14
(Onns mai permit children)	3 or more	.6	.52	.1	.1	.14
	5 of more	.0	.52	.2	.2	.27
Multiple (Condominium)	1	.0	.0	.0	.0	.0
A 18	2	.03	.026	.02	.02	.027
	3 or more	.05	.043	.02	.02	.027

K.4. RECREATION AND PARKS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XIII.2.iv): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?
- XIV.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?
- XIV.b): Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have a physical effect on the environment?

B. Introduction

Within the City of Los Angeles, the Department of Recreation and Parks operates over 16,000 acres of park land comprised of some 150 recreation centers and 386 park sites Citywide. Facilities at neighborhood parks include softball, basketball, volleyball, table games, handicrafts, lawn games, small children's play areas and community buildings. In addition to the facilities at a neighborhood park, community parks provide baseball diamonds, combined football and soccer fields, tennis, handball courts, swimming pools, and picnic areas. In ocean areas outside the Los Angeles Harbor and at beaches, there are also other opportunities such as marine recreation (e.g., boating and waterside entertainment).

The Public Recreation Plan, a portion of the Service Systems Element, includes service standards and goals for recreational facilities and operations. The City is updating the 1980 plan as a part of current long-range planning efforts.

The Quimby Act allows California municipalities to require parkland dedications of new

Department of Recreation and Parks, Valley Region Informational Guide, and telephone interview, 2003.

residential subdivisions, or to charge fees to developers in lieu of park land dedication. The City of Los Angeles enacted ordinances, which implement the Quimby Act and require dedications and fees for other types of permits and approvals.² The Quimby fee is based on the number of units and zoning for the project and site.

Service needs are related to the size of the population and geographic area served and community characteristics. Projects that affect these factors (e.g., by increasing residential population in an area) may increase the demand for recreation facilities.

C. Screening Criteria

• Would the project result in a net increase of 50 or more residential units that would adversely impact recreation and park services and/or facilities due to the project's proximity to, or expected usage of, those facilities or services?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Recreation and Parks, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Recreation and Parks from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and determine the number of net new residential units proposed. Compare this information to the Screening Criteria, considering the type of residential units proposed, the total size, and the project's proximity to recreation and park facilities.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

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Refer to the following Sections of the Los Angeles Municipal Code (LAMC): Subdivision Requirements - 17.12 and 17.58; Zone Change requirements - 12.32 and 12.33; and Dwelling Unit Construction Tax - 21.10.3.

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).³

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- The name, description, and location of recreation and park facilities serving the project and their respective acreage. Generally, this includes neighborhood parks and recreational sites within one mile of the project site, community parks and recreational sites within two miles and other park or recreational facilities or sites as appropriate. Refer to the Environmental and Public Facilities Maps, Community Parks, Neighborhood Parks, Regional Parks, and other Park Facilities, or contact the Department of Recreation and Parks, Planning and Development Office, as necessary; and
- Describe the population and geographic area served, as well as the community characteristics.

Project Impacts

Review the description of the project and surrounding area. Determine the net

The use of utility easements or transmission line right-of-way (ROW) for park or recreational facilities requires an agreement with the utility.

population increase resulting from the project and identify the recreational facilities that would be used by project residents. Evaluate the demand for recreational services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion, or addition) and the project's proportional contribution to the demand. As necessary, consult with the Department of Recreation and Parks. Evaluate project features which would reduce the demand for services (e.g., on-site recreation facilities or direct support to the Department of Recreation and Parks).

Cumulative Impacts

Identify the related projects which would be served by the same recreational facilities as the proposed project. Consider the characteristics of the related projects in terms of size, location, and types of land uses. Determine the net population increase resulting from the related projects. As above, evaluate the cumulative demand for recreational facilities anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion or addition). As necessary, consult with the Department of Recreation and Parks. As feasible, evaluate known features of the related projects that would reduce the demand for recreation services (e.g., onsite recreation facilities or direct support to the Department of Recreation and Parks). Consider the combined impact of the related and proposed projects and the project's proportional contribution to the cumulative demand.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Provide on-site recreational amenities; and
- Provide direct support to the Department of Recreation and Parks, including land, equipment, funding, etc.

3. DATA, RESOURCES, AND REFERENCES

Department of Recreation and Parks, Planning and Development Office; Telephone: (213) 485-5671.

Public Recreation Plan, a portion of the Public Facilities and Service Element, October 1980.

General Plan Framework Element, July 1996, re-adopted August 2001.

LAMC (Sections 17.12, 17.58, 12.32, 12.33, and 21.10.3).

Environmental and Public Facilities Maps (1996):

- Community Parks;
- Neighborhood Parks; and
- Regional Parks and Other Park Facilities.

The Quimby Act, California Government Code Section 66477, allows the legislative body of a city or county, by ordinance, to require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative map or parcel map.

K.5. LIBRARIES

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

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

B. Introduction

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) System provides library services at the Central Library, eight regional branch libraries, 67 community branches and four bookmobiles. Approximately 6 million books and other materials comprise the City Library collection. The Central Library houses 2.2 million of these.¹

The Public Libraries Plan, an element of the City's General Plan, includes service standards and goals for library facilities and operations. In 1988, the Library adopted its own master plan for libraries and subsequently funded it through two bonds (1989 & 1998). The final phase of the library master plan will be completed in 2004 when the final bond libraries are opened. Current site selection criteria are listed in Exhibit K.5-1.

Service needs are related to the size of the population and geographic area served and community characteristics. Projects that affect these factors (e.g., by increasing residential population in an area) may increase the demand for service from the LAPL.

C. Screening Criteria

• Would the proposed project result in a net increase of 75 residential units or more?

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LAPL, Public Relations Fact Sheet, provided by Robert Reagan, Public Information Director, December 29, 1994 and Los Angeles Public Library, 2003.

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Libraries and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Libraries from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and determine the number of net new residential units proposed. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

Name, location, and description of the LAPL facilities serving the project site, including capacity, population served, operating characteristics, and scheduled improvements. Generally, this includes libraries within two miles. If unknown, refer to the Environmental and Public Facilities Map, Los Angeles Public Libraries, or see Exhibit

K.5-2. (For information about improvements, contact the LAPL Library Construction Unit.); and

- Description of the population and geographic area served, as well as community characteristics.

Project Impacts

Review the description of the project and surrounding area. Determine the net population increase resulting from the project and identify the LAPL facilities that would be used by the project residents. Identify existing facilities and their capacities. Evaluate the demand for library services anticipated at the time of the project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion, or addition) and the project's proportional contribution to the demand. As necessary, consult with LAPL. Evaluate project features, which would reduce the demand for library services (e.g., onsite library facilities or direct support to LAPL). Describe any characteristics of the project area, such as a college or other library near the project site, that would reduce the demand for LAPL services.

Cumulative Impacts

Identify the related projects, which would be served by the same LAPL facilities as the proposed project. Consider the characteristics of the related projects in terms of size, location, and types of land uses. Determine the net population increase resulting from the related projects. As above, evaluate the cumulative demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements (renovation, expansion, addition, or relocation). As necessary, consult with LAPL. As feasible, evaluate known features of the related projects (e.g., on-site library facilities or direct support to the LAPL), which would reduce the expected cumulative demand for library service. Consider the combined impact of the proposed and related projects and the project's proportional contribution to the cumulative demand.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Provide on-site or other private library facilities; and
- Provide direct support to the LAPL, including land, equipment, materials, funding, etc.

3. DATA, RESOURCES, AND REFERENCES

LAPL, Branch Facilities Division; Telephone: (213) 228-7576.

The Environmental and Public Facilities Map (1996), Los Angeles Public Libraries, shows the location of LAPL facilities and their service radii.

Exhibit K.5-1 LOS ANGELES PUBLIC LIBRARY (LAPL) Branch Facilities Site Selection Criteria

1. Branch building size standards are:

Population Served	Size of Facility	Property Required
	(sf)	(sf)
Above 50,000	12,500	32,500
Below 50,000	10,500	27,500
Expansion or Special Situations*	Special Size	
Regional Branch	Up to 20,000	52,000

^{*}Due to available property size and configuration, architectural constraints or opportunities, or building code requirements, some facilities may differ from the recommended sizes.

- 2. Security conscious design located in retail center.
- 3. A one-story library building with interior layouts designed to accommodate:
 - Full access for the disabled;
 - Interior layouts designed to accommodate electronic technology;
 - Substantial shelving and seating capacities; and
 - To include a community meeting room.
- 4. Good visibility and street access.
- 5. Easily accessible by car, by bus and on foot.
- 6. Taking into consideration the relative locations of all schools served by the branch.
- 7. Taking into consideration the relative locations of neighboring branch libraries.

Exhibit K.5-2 LOS ANGELES PUBLIC LIBRARY (LAPL) BRANCH FACILITIES

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a	
	Existing	Proposed		
Angeles Mesa 2700 W. 52nd St.	4,750	5,250	Structurally reinforce and renovate existing historic building.	
Arroyo Seco Regional 6145 N. Figueroa St.	10,200	14,000	New 2-story building on existing site. Open June 2003	
Ascot 120 W. Florence Ave	6,642	10,500	New building. Open April 2004	
Atwater Village 3379 Glendale Blvd.	5,900		New building (1989), meets standard.	
Baldwin Hills 2906 S. La Brea Ave.	5,278	12,000	New building opened Feb 2002	
Benjamin Franklin 2200 E. First St.	9,656	9,656	New building. (1975), meets standard.	
Brentwood 11820 San Vicente Blvd.	3,463	10,500	New 2-story building on existing site. (1994).	
Cahuenga 4591 Santa Monica Blvd.	10,621	12,000	Structurally reinforce, renovate and expand on existing historic building. Obtain adjacent site. Provide parking.	
Canoga Park 7260 Owensmouth Ave.	6,469	12,500	Grand opening, Aug 2004	
Chatsworth Temp. Loc.*	5,463	12,500	Permanent location: 21052 Devonshire St., Grand opening Sept. 2004	
10044 Old Depot Plaza Rd				

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a	
	Existing	Proposed		
Chinatown 639 N. Hill St.	14,162 Leased	14,500	New building. Opened Feb. 2003	
Cypress Park 1150 Cypress Ave.	3,080	10,750	Opened Jan. 2003.	
Eagle Rock 5027 Caspar Ave.	12,411		New building (1981); meets standard.	
Echo Park 1410 W. Temple	7,919	12,500	Relocate. Obtain site for new building.	
Edendale 2011 W. Sunset Blvd.	None	12,500	Grand opening Sept. 2004.	
El Sereno 5226 Huntington Dr., S.	4,274	10,500	Grand opening Sept. 2004.	
Encino -Tarzana 18231 Ventura Blvd.	5,404	12,500	New building on site. Opened April 2003.	
Exposition Park b 3665 S. Vermont Ave.	9,656	15,000	Renovate. Long Range: Expand. Obtain adjacent site.	
Fairfax 'Express Station' Branch closed for remodeling 161 S. Gardner St.	5,230	12,500	Relocate. New building 75% complete.	
Felipe de Neve 2820 W. Sixth St.	7,761	9,000	Structurally reinforce, renovate and expand on existing historic building. Provide parking.	
Goldwyn-Hollywood Regional 1623 N. Ivar Ave.	19,000		New building (1986); meets standard. Long Range: Obtain site for parking.	

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a
	Existing	Proposed	
Granada Hills 10640 Petit Ave.	11,310		New building; expanded (1975); meets standard. Closed for Seismic repair.
Harbor Gateway-Harbor City 24000 Western Ave.	6,300 Leased	14,500	Project in progress - bid and Award 45% Complete
Hyde Park 2205Florence Ave.	4,389	10,500	Grand opening, Oct. 2004
Jefferson 2211 W. Jefferson Blvd.	2,980	9,000	Renovate and expand. Obtain adjacent site for parking.
John C. Fremont 6121 Melrose Ave.	4,276	8,000	Structurally reinforce, renovate and expand on existing historic building. Obtain adjacent site. Provide parking.
John Muir 1005 W. 64th Street	4,850	8,000	Structurally reinforce, renovate and expand. Obtain adjacent site. Provide parking.
Junipero Serra 4607 S. Main St.	Leased 3,922	10,500	Relocate. Obtain site for new building.
Lake View Terrace 12002 Osborne Street	12,500		
La Biblioteca del Pueblo de Lincoln Heights 2530 Workman St.	7,072	10,500	Structurally reinforce, renovate and expand on existing historic building. Provide parking.
Little Tokyo 203 S. Los Angeles St.	2,500	12,500	Construction 75% complete
Los Feliz 1874 Hillhurst Ave.	2,250	10,500	Relocate. Obtain site for new building.

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a
	Existing	Proposed	
Winchester 7114 W. Manchester Ave.	4,369	12,500	Obtain site for new building.
Malabar 2801 Wabash Ave.	1,168	6,000	Structurally reinforce, renovate and expand historic building.
Mar Vista 12006 Venice Blvd.	5,450	12,500	Grand Opening, March 2003
Mark Twain 9621 S. Figueroa St.	4,342	9,900	Grand opening, Jan. 2003.
Memorial 4625 W. Olympic Blvd.	7,217	10,500	Structurally reinforce, renovate and expand on existing historic building. Provide parking.
Mid Valley Regional & Bookmobile Headquarters 16244 Nordhoff St.	27,981		New building on City-owned site. Complete. (1996).
North Hollywood Regional 5211 Tujunga Ave.	12,597	15,150	Expand on existing historic building to add a multipurpose meeting room & parking lot. Grand opening, November 2002.
Northridge 9051 Darby Ave.	6,240	12,500	New building on existing site. Grand opening, Dec. 2003.
Pacoima 13605 Van Nuys	5,511	11,300	New building on existing site. Grand opening, April 2002.
Palisades 861 Alma Real Dr.	7,025	11,500	New bldg. On existing site. Grand opening, Feb. 2002.
Palms-Rancho Park 2920 Overland Ave.	6,342	10,500	New building on existing site. Grand opening, Nov. 2002.

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a	
	Existing	Proposed		
Panorama City 14345 Roscoe Blvd.	6,101	12,500	New building on existing site. Obtain adjacent site.	
Pico Union 1030 S. Alvarado	None	12,500	Grand opening, May 2004.	
Pio Pico – Koreatown 694 S Oxford Ave	18,000		New address	
Platt 23600 Victory Blvd.	14,053		New building on City-owned site. Complete (1995).	
Playa Vista 6400 Playa Vista Dr.	None	10,500	New building on a site to be provided by the Playa Vista developer. Grand opening, May 2004.	
Porter Ranch 11371 Tampa Ave.	12,300		New building on City-owned site. Complete (1995).	
R. L. Stevenson 803 Spence St.	4,474	5,000	Structurally reinforce, renovate and expand on existing historic building.	
Robertson 1719 S. Robertson Blvd.	3,505	10,500	New 2-story building on existing site.	
San Pedro Regional 931 S. Gaffey St.	20,000		New building (1983); meets standard. Long Range: Obtain adjacent site for added parking. Ceremony and Dedication, Jan. 2001	
Sherman Oaks 14245 Moorpark St.	None	12,500	Renovate and expand on existing site. Obtain adjacent site. Grand opening, May 2003.	
Silver Lake, Ph. I To be determined.	5,230	10,500	Project in site and land acquisition stage.	

Name & Address of Branch	Name & Address of Branch Building Size (In Square Feet)		Branch Facilities Plan a
	Existing	Proposed	
Studio City 12511 Moorpark St.	5,230	10,500	New building on existing site. Obtain adjacent site.
Sun Valley 7935 Vineland Ave.	5,230	12,500	New building on existing site. Obtain adjacent site. Grand opening, Sept. 2003.
Sunland-Tujunga 7771 Foothill Blvd.	4,500	10,500	New building on existing site. Obtain adjacent City-owned site.
Sylmar 14561 Polk St.	5,511	12,500	New building on existing site. Obtain adjacent site. Grand opening, Sept. 2003.
Valley Plaza 12311 Vanowen St.	5,450	10,500	Renovate and expand on existing site. Grand opening, Jan. 2004.
Van Nuys 6250 Sylmar Ave. Mall	12,814		Renovate existing building and optimize parking lot. Transfer Valley Bookmobile Unit to Mid-Valley Regional Branch Library. Complete (1996).
Venice – Abbot Kinney 501 S. Venice Blvd.	5,581	10,500	Relocate. New building on City-owned site.
Vermont Square 1201 W. 48 th St.	8,000		Structurally reinforce and renovate existing historic building with small expansion. Complete (1996).
Vernon – Leon H. Washington Jr Memorial 4505 S. Central Ave.	10,325		New building; meets standard.
Washington Irving 4117 W. Washington Blvd.	3,918	10,500	Relocate. Obtain site for new building.

Name & Address of Branch	Building Size (In Square Feet)		Branch Facilities Plan a
	Existing	Proposed	
Alma Reaves Woods - Watts 10205 Compton Ave.	3,542	12,500	Exchange Library-owned property for CRA land on the corner of 102 and Compton. New building on CRA site.
West Los Angeles Regional 11360 Santa Monica Blvd.	13,740	13,740	Renovate existing building. Long Range: Obtain adjacent site for parking.
West Valley Regional 19036 Vanowen St.	12,469	14,000	Renovate and expand to add a multipurpose meeting room on existing site. Grand opening, Oct. 2002
Westchester-Loyola Village 7114 W. Manchester Ave.	5,918	12,500	Relocate and combine with Loyola Village. Obtain site for new building. Grand opening, June 2003.
Westwood 1246 Glendon Ave.	None	12,500	Under construction, 80% complete.
Will & Ariel Durant 7140 W. Sunset Blvd	4,155	12,500	Relocate. Obtain site for new building. Grand opening, Jan 2004.
Wilmington 1300 North Avalon Blvd.	10,500		New building (1988); meets standard.
Wilshire 149 N. St. Andrews Pl.	6,258		Structurally reinforce and renovate existing historic building.
Woodland Hills 22200 Ventura Blvd.	6,272	12,500	New building on existing site. Grand opening, Aug. 2003.
Westwood	None	12,500	Obtain site for new building.

Adopted by the Board of Library Commissioners August 24, 1988; Revised 1991, 1992, 1998, 1999, 2001, 2002. LAPL, 1998 Library Bond Program Annual Report, July 2003 and July 2004.

a) Some historic building renovations will not include parking.

L. TRANSPORTATION

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L.1. INTERSECTION CAPACITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XV.a): Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads or congestion at intersections)?
- XV.b): Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

B. Introduction

This issue involves the ability of an intersection to accommodate the increased vehicular traffic demands associated with a proposed project. The impact typically results from the addition of new project-generated traffic to an intersection. In situations where a project involves street vacations or other substantial street system changes, it can also result from diverted or shifted traffic caused by the project. Impacts may also result from a combination of new trips and diverted traffic. The impact is measured as the effect of the project on traffic operating conditions, expressed in terms of level of service (LOS) and either volume to capacity (V/C) ratio (for signalized intersections) or average vehicle delay (for unsignalized intersections). Impacts are related to factors such as type of use, size of project, access points, capacity of the transportation system, and other characteristics of the project and surrounding area. For impacts on emergency access, see K.2. FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES.

Intersection capacity impacts are evaluated when project details, such as land use and size, location of access points, etc., are known. If these features are not known, see L.2. STREET SEGMENT CAPACITY. Intersection capacity impacts are typically evaluated for permanent traffic increases after project completion, but can also be evaluated for temporary traffic increases generated during project construction. Impacts should be evaluated for a future study year usually

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Impacts related to loss of capacity due to temporary lane closures associated with projects requiring construction activity within the street are discussed in L.8. IN-STREET CONSTRUCTION IMPACTS.

set one or two years after the expected year of project completion. The following traffic scenarios should be analyzed:

- **Existing Conditions**;
- Cumulative (Future) Base Conditions (also termed the "No Project" alternative); and
- Cumulative (Future) Plus Project Conditions

C. Screening Criteria

• Would the proposed project generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more p.m. peak hour vehicle trips on the street system?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Intersection Capacity, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant Intersection Capacity impact from the proposed project.

D. Evaluation of Screening Criteria

If the project is expected to generate new or shift existing vehicular traffic, estimate the number of peak hour trips expected to result from project implementation and compare this information to the Screening Criteria.

To estimate new project trips, apply the appropriate trip generation rates to the proposed project land uses.² The following two sources of trip rates are preferred:

- Standard trip generation rates/equations contained in the latest edition of Trip Generation, published by the Institute of Transportation Engineers (ITE); and
- Trip generation rates specified in a Transportation Specific Plan (TSP) or Interim Control Ordinance (ICO) must be used if the project is located in a TSP or ICO area.

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Note that traffic studies which are required by City of Los Angeles Department of Transportation (LADOT) (CEQA and non-CEQA) are also subject to the policies and procedures of LADOT's Traffic Study Policies and Procedures Manual as well as requirements of applicable specific plans. Contact LADOT at (213) 580-1195 for further information.

If the above sources do not provide rates for a particular land use under study, or due to unique characteristics of the project it is believed that standard rates are not appropriate, the following alternative techniques may be considered:

- Use of alternative published rates, such as those contained in the latest edition of Trip Generators (San Diego Association of Governments (SANDAG));
- Use of rates empirically derived from trip generation studies of similar developments or facilities; and
- Explicit derivation of vehicle trips based upon estimation of person trips. For example, because little or no trip rate data exist for museum facilities, trip generation for such developments could be derived by applying mode split and vehicle occupancy data to estimated person trips for the various generators (patrons, employees, service/delivery).

If the project is expected to divert or shift traffic, estimate the amount based on the project characteristics and on ambient traffic volumes for the affected streets/intersections and compare to the Screening Criteria.

For freeway ramp intersections, use the same trip generation rates and calculate the number of trips that would occur at identified ramp intersections in the a.m. or p.m. peak hour. See the Project Impact section for a discussion of trip distribution methods.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

A proposed project would normally have a significant impact on intersection capacity if the project traffic causes an increase in the V/C ratio on the intersection operating condition after the addition of project traffic of one of the following:

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V/C ratio increase >0.040 if final LOS* is C
V/C ratio increase >0.020 if final LOS* is D
V/C ratio increase >0.010 if final LOS* is E or F
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* "Final LOS" is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.

Note that if stricter criteria are required in an applicable local TSP or ICO, those criteria will apply.

If an unsignalized intersection is projected to operate at LOS C, D, E or F, re-analyze the intersection using the signalized intersection methodology to determine the significance of impacts using the sliding scale criteria described above.

B. Methodology to Determine Significance

Environmental Setting

Describe the existing traffic conditions based on the appropriate study area, time periods, existing transportation facilities, traffic counts, and LOS.

Study Area and Time Periods for Analysis. Identify the geographic study area (i.e., intersections to be analyzed), based on project size, type, location and existing levels of traffic, in consultation with Los Angeles Department of Transportation (LADOT). Include intersections of surface streets with other surface streets and with freeway ramps, as well as the appropriate Congestion Management Program (CMP) arterial monitoring intersections.³

For most projects, analyze existing traffic for both the a.m. and p.m. weekday peak hours. For some projects, analysis of p.m., midday or weekend periods is appropriate if those are expected to be the prime periods of trip generation for the project (e.g., a recreational project).

Existing Setting. Describe existing traffic conditions, including:

- A description of the existing street system serving the defined study area (i.e., number of lanes, traffic control devices, on-street parking, etc.);
- Existing lane configurations and signal phasing at study intersections;
- Existing peak hour traffic turning movements at study intersections. Traffic counts should not be more than two years old; and
- Quantify the existing LOS at the intersections to be analyzed using the appropriate intersection capacity methodology described below:

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See Exhibit L-3 in L. TRANSPORTATION for a map of CMP monitoring locations.

- Signalized Intersections For the analysis of signalized intersections, determine peak hour LOS based on the Critical Movements Analysis (CMA) methodology contained in the Transportation Research Board's (TRB) Circular No. 212 -Interim Materials on Highway Capacity at the identified intersections. Summarize V/C ratio and LOS in the study; and
- Two-Way and All-Way Stop-Controlled (Unsignalized) Intersections For twoway and all-way stop-controlled intersections, use the procedures described in Chapter 10 of TRB's Highway Capacity Manual, Special Report 209, Third Edition. Summarize average vehicle delay and LOS in the study.

LOS definitions for signalized and unsignalized intersections are listed in Exhibits L.1-1 and L.1-2. For additional details regarding intersection LOS calculation, see LADOT's Traffic Study Policies and Procedures Manual.

Project Impacts

Project impacts are typically based upon a comparison of intersection LOS for cumulative base and cumulative base plus project (final LOS) conditions. The cumulative base conditions are comprised of existing traffic levels increased by a factor to account for ambient growth, plus projected traffic levels from known related projects in the vicinity. Using the appropriate intersection capacity methodologies described above, quantify the cumulative plus project LOS at the study intersections for the projected cumulative plus project traffic volumes. The project impact is determined by comparing the projected cumulative base and cumulative plus project intersection LOS, using the defined significance threshold.

Project Trip Generation. The preferred methods of calculating trip generation rates are described above in Evaluation of Screening Criteria.

Depending upon the particular characteristics of the project, one or more of the following adjustments to the project trip generation may be appropriate (consult with LADOT for applicability):

Central Business District (CBD) Trips - If the project is located within the CBD, defined as the area bordered by the Santa Ana Freeway to the north, Los Angeles Street to the east, the Santa Monica Freeway to the south, and the Harbor Freeway to the west, trip reduction factors may be applied to reflect prevailing CBD mode splits. (Consult with LADOT for most current rates.);

- Pass-by Trips "Pass-by trips" occur when a proportion of traffic generated by a shopping center, for example, is not new to the area but is actually diverted from the flow of traffic that already existed on the adjacent street system. LADOT's discount rates for pass-by trips are shown in Exhibit L.1-3;
- Mode Split Adjustments The mode split inherent in the ITE trip generation rates for most land uses reflect a relatively modest transit usage (typically less than 5 percent), and thus a low average vehicle ridership (AVR). If the project is located in an area where transit mode split or vehicle occupancy is considered to be higher than normal, identify the prevailing or projected mode split(s) for the project area to determine an appropriate adjustment to the ITE rates. Several data sources are available to perform this evaluation, including the South Coast Air Quality Management District (SCAQMD) Regulation XV data (through March 1996) which summarizes employee trips by travel mode, data from the Los Angeles County Metropolitan Transportation Authority (Metro), Southern California Association of Governments (SCAG), Southern California Rideshare office, and/or City of Los Angeles Citywide Framework regional travel demand models;
- Captive Market (Internal) Trips For mixed-use projects, different land uses or trip generators may capture patronage from within the project site. The following sources are available to estimate captive market reductions:
 - National Cooperative Highway Research Program (NCHRP) Report 323 Travel Characteristics at Large-Scale Suburban Activity Centers;
 - Trip Generation; and
 - Urban Land Institute (ULI) Shared Parking.
- Removal of Existing Land Uses Trips from existing land uses which will be removed, but have been in place at least six months within the last two years, may be credited against the new trips generated by the project (if "existing" traffic counts reflect the existing land use). Projects within a TSP area may be subject to different regulations in regards to existing use trip credits. If driveway counts are not available, trip generation for the existing uses should be estimated using the trip generation procedures described above.

Trip Distribution. The geographic distribution of traffic generated by developments is dependent upon such factors as: the type and density of the proposed land uses; the geographic

City of Los Angeles L.A. CEOA Thresholds Guide distribution of the population, employment, and commercial centers that would attract the project-generated traffic (i.e., the "market" area); the location of site access points in relation to the surrounding street system; the level of congestion on local streets; and the physical characteristics of the street system. To identify total project trip distribution, develop individual distribution patterns for each land use associated with both the project and cumulative projects. Distribution patterns can be based upon: information from previous traffic studies; trip table data from SCAG or City of Los Angeles Framework regional travel demand forecasting models; or most recent CMP.

Cumulative Impacts

The cumulative base traffic forecasts consist of three elements: existing traffic; ambient increases due to regional growth and development; and traffic from specific known development projects in the vicinity of the project. Ambient regional growth is derived through the application of an annual growth factor to existing traffic volumes. The ambient growth factor should be no higher than the regional growth factors contained in the most recent CMP and should usually be less to avoid double counting of trips generated by cumulative projects when the cumulative projects are consistent with the long-range forecasts used to develop the ambient regional growth factor.

The list of cumulative projects (including pertinent descriptive data such as location, types and sizes of land uses, and status) should be developed from files maintained by the LADOT and supplemented with data from the City Planning Department and the Community Redevelopment Agency (CRA) of the City of Los Angeles (for adopted redevelopment areas). General criteria that should be considered for the selection of cumulative projects include:

- The sphere of influence for cumulative projects, based on their proposed size and likely influence on traffic patterns, generally within one or two miles of the proposed project;
- Very large, regionally significant projects that are located outside the typical sphere of influence (i.e., beyond two miles from the analysis area), but could impact intersections analyzed for the project; and
- Projects proposed within neighboring jurisdictions if they could impact the same analyzed intersections.

Determine the trip generation and distribution for cumulative projects using the procedures described above for the project. Add the existing traffic volumes, factored by the ambient

growth rate, to the estimated cumulative projects trips to develop cumulative base traffic projections at the study intersections.

Using the appropriate intersection capacity methodologies described in Evaluation of Screening Criteria, quantify the cumulative base LOS at the study intersections for the projected cumulative traffic volumes. Also, incorporate any approved mitigation measures associated with the cumulative projects into the cumulative base traffic assessment.

Cumulative Plus Project Impact

Using the project trip generation estimates and distribution patterns developed above, assign the project-generated trips to the street system. Then, add the estimated project-generated trips to the cumulative base traffic volumes to develop cumulative plus project traffic projections at the study intersections. Determine the final LOS⁴ and the change in the V/C ratio and compare to the Significance Threshold.

Sample Mitigation Measures

Potential mitigation measures include transportation demand management (TDM) measures, transportation system management (TSM) measures, physical roadway improvements, or a combination thereof. The following lists a variety of possible mitigation measures in priority order per LADOT guidelines. Consult with LADOT, as needed, for further information.

TDM Measures reduce single occupancy vehicle (SOV) trips and encourage ridesharing and transit use.⁵ Individual measures and actions which could be included in a TDM plan include the following:

- A commuter transportation coordinator;
- Carpool and vanpool program, including participation in a computerized matching system;
- Parking management techniques, including elimination of parking subsidies, constraining the parking supply, preferential parking for rideshare vehicles, offering a cash equivalent of parking costs as a travel allowance, etc;
- Encourage non-vehicle modes, such as bicycling, walking, or telecommuting;

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[&]quot;Final LOS" is defined as projected future conditions including project, ambient, and related project growth, but without project traffic mitigation.

See the most recent edition of LADOT's Traffic Study Policies and Procedures Manual for a description of the requirements for preparation and content of a TDM plan.

- Flexible or staggered work hours, potentially including compressed work weeks (i.e., 4/40 or 9/80 plans);
- Transit incentives and improvements, including subsidized transit passes, distribution
 of transit information and schedules, and provision of shelters or benches at bus stops
 and/or layover areas;
- Vehicle trip reduction incentives and services affecting visitors to the project, such as shoppers, clients, patrons, etc; and
- Site trip generation cap and/or parking cap including trip monitoring agreements.

Transit Capacity and Access Improvements:

- Implementation of a local shuttle bus service providing direct access from the project site to multimodal or rail transit stations;
- Bus benches, shelters, or other amenities;
- Concrete bus pads and bus stops; and
- Contributions toward transit stations or centers.

Traffic Signal Improvements:

- Addition of a signal to the City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) system (available only where ATSAC has not yet been constructed or a fully-funded construction contract has not been awarded);
- Upgrade of an existing ATSAC signal system to Adaptive Traffic Control System (ATCS);
- Signal modifications, including signal timing, coordination, phasing improvements, etc; and
- New signals, which requires a traffic signal warrants analysis.⁶

Physical Improvements:

- Turn restrictions;
- One-way streets;
- Conversion of mixed-flow lanes to High Occupancy Vehicle (HOV) lanes (permanently or during peak periods);
- Reversible HOV or mixed-flow lanes;
- New roadway;

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See Traffic Manual of the California Department of Transportation (Caltrans), Manual on Uniform Traffic Control Devices, by the Federal Highway Administration (FHWA), and Warrants for Traffic Signals (LADOT) to evaluate the need for traffic signals.

- Roadway widening to add lanes;
- Extension of truncated street;
- Intersection grade separation;
- Partial intersection grade separation (i.e., left-turn flyovers);
- New freeway on- or off-ramps;
- Redesign of freeway on- and off-ramps;
- Median construction/modification to restrict access;
- Pedestrian crossing grade separation; and
- Flaring of intersections to add turn lanes.

Street Restriping and Parking Prohibitions:

- Restriping to add lanes, with or without parking removal or restrictions;
- Protected left turn pockets, or free right turn lanes; and
- Parking restrictions, daily or during peak hours.

Trip Fees/Mitigation Trust Fund:

If the project is located in a TSP area, an applicant may be required by City Ordinance to pay "trip fees" into a mitigation trust fund for implementation of larger regional projects that are specified in the TSP. If a traffic study demonstrates that the applicant is responsible for only a portion of a large and costly mitigation measure, such as a bridge or freeway ramp, a fair share contribution toward the cost of the improvement may be an acceptable mitigation.

3. DATA, RESOURCES, AND REFERENCES

- LADOT, Bureau of Transportation Programs and Development Review, 100 South Main Street, 9th Floor, Los Angeles, California 90012; Telephones: (213) 972-8485 (Metro/South L.A.), (818) 374-4690 (Valley), and (213) 485-1062 (West/Coastal). For traffic study scoping, intersection/street as-built plans, traffic count files, or other assistance.
- LADOT, Traffic Study Policies and Procedures Manual, March 2002 or most recent. Warrants for Traffic Signals.
- City Planning Department, Community Planning Bureau, 200 North Spring Street, 6th Floor, Los Angeles, California 90012; Telephones: (213) 978-1168 (South L.A.), (213) 978-1179 (Metro/Central), (213) 978-1177 (West/Coastal). For ICOs, TSPs, Framework Regional Travel Demand Forecasting Model, Circulation Element, Proposed Transportation Element, and other planning documents.

American Association of State Highway and Transportation Officials (AASHTO), A Policy on Geometric Design of Highways and Streets, 2004.

Caltrans, Highway Design Manual, 5th Edition, July 1995.

Caltrans, Traffic Manual, September 1992.

Caltrans, 2004 Traffic Volumes on California State Highways, 2005 (or latest edition).

Federal Highway Administration (FHWA), Manual on Uniform Traffic Control Devices (MUTCD), Revision 1, 2003.

ITE, Traffic Access and Impact Studies for Site Development: A Recommended Practice, 1991.

ITE, Traffic Engineering Handbook, 5th Edition, 1999

ITE, Transportation and Land Development, 2003.

ITE, Transportation Planning Handbook, 2003.

LACMTA, CMP for Los Angeles County, adopted July 2004 (or most recent).

SANDAG, Trip Generators, October 1993 (or latest edition).

SCAG, 1991 Southern California Origin-Destination Survey, Summary Findings, February 1993. Available by calling (213) 236-1800.

TRB, Circular No. 212 - Interim Materials on Highway Capacity, 1980.

TRB, Highway Capacity Manual, Special Report 209, Third Edition, 1994. NCHRP Report 323 - Travel Characteristics at Large-Scale Suburban Activity Centers, 1989.

ULI, Shared Parking, Second Edition, 2005.

FHWA, Manual on Uniform Traffic Control Devices, 2003.

FHWA, Technology Sharing Report 80-204, Design of Urban Streets, January 1980.

Exhibit L.1-1 LEVEL OF SERVICE (LOS) DEFINITIONS FOR SIGNALIZED INTERSECTIONS

LOS	Volume to Capacity (V/C) Ratio	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
В	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
С	0.701 - 0.800	GOOD. Occasionally drivers have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	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.
Е	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	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.

Source: TRB, Circular No. 212, Interim Materials on Highway Capacity, 1980.

Exhibit L.1-2
LEVEL OF SERVICE (LOS) DEFINITIONS FOR
TWO-WAY AND ALL-WAY STOP-CONTROLLED INTERSECTIONS

LOS	Average Vehicle Delay (seconds)
A	0.0 - 5.0
В	5.1 - 10.0
С	10.1 - 20.0
D	20.1 - 30.0
E	30.1 - 45.0
F	> 45.0

Source: TRB, Highway Capacity Manual, Special Report 209, Third Edition, 1994.

Exhibit L.1-3 PASS-BY TRIP DISCOUNT RATES

The pass-by trip reduction rates shown below are used for land development projects by the LADOT. However, these rates are superseded by additional guidelines provided in TSPs or ICOs. These rates are not applicable to review of impacts at project driveways and the intersection(s) immediately adjacent to the project site, and are not used in determining the need for a traffic study.

PASS-BY TRIP DISCOUNT RATE	LAND USE CATEGORY
10%	Shopping Center 600,000 sf or more, Quality Restaurant, Specialty Retail, Furniture Store, Medical Office, Day Care, Theater/Cinema, Auto Sales/Repair
20%	Shopping Center 300,000 to less than 600,000 sf, Bank/Savings & Loan, High Turnover Restaurant, Car Wash, Hardware/Lumber Store, Garden Center, Recreation/Health Club
30%	Shopping Center 100,000 to less than 300,000 sf, Discount Club, Discount Store, Auto Parts, Music/Video Store
40%	Shopping Center 50,000 to less than 100,000 sf, Supermarket, Drugstore, Bookstore
50%	Shopping Center less than 50,000 sf, Fast Food Restaurant, Gasoline/Service Station, Convenience Market, Flower/Bakery/Yogurt Shop, Dry Cleaner, Liquor Store

Note: sf = square feet

Source: LADOT.

L.2. STREET SEGMENT CAPACITY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

XV.a): Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

B. Introduction

This issue involves the ability of a street or roadway segment to accommodate increased vehicular traffic demands associated with a proposed project. The impact typically results from the addition of new traffic generated by a project to a street segment although, in situations where a project involves street vacations or other substantial street system changes, it can also result from diverted or shifted traffic caused by the project or a combination of new and diverted traffic. The impact is measured as the effect of the project on traffic operating conditions, expressed in terms of level of service (LOS) and volume to capacity (V/C) ratio. Impacts are related to factors such as type of use, development densities, capacity of transportation system, and other characteristics of the project and surrounding area.

Street segment capacity impacts are generally evaluated in program-level analyses (such as specific plans or long-range development projects) for which details regarding specific land use types, sizes, project access points, etc., are not known. If such details are known, see L.1. INTERSECTION CAPACITY for applicability. As a travel demand forecasting model is generally used to develop traffic projections, the future study year will usually be the same as the horizon year used by the regional models. Depending on the project, it may not be necessary to evaluate street segment capacity impacts in addition to intersection capacity impacts. Street segment capacity impacts are evaluated for permanent traffic increases after project completion.

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Impacts related to loss of capacity due to temporary lane or street closures associated with projects requiring construction activity within the street are discussed in L.8. IN-STREET CONSTRUCTION IMPACTS.

The following traffic scenarios are to be analyzed for street segment capacity impacts:

- Existing Conditions;
- Cumulative Base Conditions (scenario assuming "No Growth" in program area); and
- Cumulative Plus Project Conditions (project can represent full buildout of a plan or a probable market scenario).

C. Screening Criteria

• Would the proposed project generate and/or cause a diversion or shift of 500 or more daily vehicle trips or 43 or more a.m. or p.m. peak hour trips?

A "yes" response to the preceding question indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Street Segment Capacity, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Street Segment Capacity from the proposed project.

D. Evaluation of Screening Criteria

Estimate the project trip generation using the trip generation and distribution methodologies in L.1. INTERSECTION CAPACITY. Compare the result to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A proposed project would normally have a significant street segment capacity impact if project traffic causes an increase in the V/C ratio on the street segment operating condition after the addition of project traffic equal to or greater than the following:

V/C ratio increase ≥0.080 if final LOS* is C

V/C ratio increase ≥0.040 if final LOS* is D

V/C ratio increase ≥0.020 if final LOS* is E or F

* "Final LOS" is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.

B. Methodology to Determine Significance

Environmental Setting

Describe the existing traffic conditions based on the appropriate study area, time periods, existing transportation facilities, traffic counts, and LOS, as detailed below.

Study Area and Time Periods for Analysis. Identify the geographic study area (i.e., street segments to be analyzed), based on project size, type, location, and existing levels of traffic, in consultation with the Los Angeles Department of Transportation (LADOT). Include key major streets and secondary highways and the appropriate arterial street approaches in the Congestion Management Program (CMP). For most projects, analyze existing traffic for both the a.m. and p.m. weekday peak hours. For some projects, analysis of other time periods, such as mid-day or weekend periods, may be required if those are expected to be the prime periods of trip generation for the project (e.g., a recreational project).

Existing Setting. Inventory existing traffic conditions including, the following:

- A description of the existing street system serving the defined study area (i.e., number of lanes, traffic control devices, on-street parking, etc.); and
- Existing peak hour traffic volumes on study street segments. Traffic counts should not be older than two years.

Quantify the existing peak hour V/C ratios and LOS at the study street segments using the street capacity methodology described below.

Street Segment Capacity Methodology. Peak hour roadway (street segment) capacities are based upon several parameters including number of lanes, median type, roadway width, parking conditions, and spacing of signalized intersections. Vehicle capacities are based on the street classification. Consult with LADOT regarding roadway capacities, as needed.

For each study street segment, divide peak hour directional traffic volumes by the directional street segment capacity (determined by multiplying the number of lanes with the selected lane capacity) to calculate a V/C ratio, which is then used to determine LOS. LOS

definitions for street segments are included in Exhibit L.2-1.

Project Impacts

Impacts are determined by comparing street segment LOS for the cumulative base and cumulative plus project (final LOS) traffic projections, using the defined significance threshold. The Los Angeles Department of Transportation (LADOT) should be consulted to determine the method in which to develop the traffic projections. Future base traffic volumes may be calculated using traffic growth factors or by employing a travel demand forecast model.

- Travel Demand Forecasting Model. Use the focused travel demand forecasting model, which is based on the Citywide Framework model, to forecast future traffic conditions. Additional street network and traffic zone detail should be added in the program study area, which requires disaggregation of the Framework model trip tables. The development of the focused area model may require other modifications and calibration. Consult with LADOT for further information.
- **Program Trip Generation**. Once the model is calibrated, replace the Framework model vehicle projections for the study area with trip ends consistent with the expected type and level of development under the project. Trips should be generated by trip type (e.g., home-work, home-other, non-work), and converted to peak hour trip tables.
- **Trip Distribution.** Using the focus area model, it is suggested that a trip table balancing process be used for each trip type to replicate the trip distribution inherent in the Framework model, prior to conversion of the daily trip tables to peak hour.

Cumulative Impacts

As described above in Project Impacts, develop the focus area model using the Citywide Framework model as the basis for the remainder of the City and the region, with additional model detail added in the program study area. The long-range regional socioeconomic growth projections inherent in the Framework model (which incorporates socioeconomic projections from the Southern California Association of Governments (SCAG) for the region outside of Los Angeles) would represent cumulative base conditions for the study. If necessary, the model trip tables can be adjusted to account for significant large cumulative developments which were not included in the original Framework model trip tables.

Cumulative Plus Project Impacts

Project impacts are usually compared against future cumulative base conditions (the "No Growth" scenario for programs). The model trip tables will likely require modification to replace future growth inherent in the regional models with "no growth" estimates for the program area. Follow the procedures described above for program trip generation to modify the trip tables. Using the street segment capacity methodology described previously, quantify cumulative base LOS at the study street segments from the travel demand focus area model and compare to cumulative plus project LOS (final LOS).²

Sample Mitigation Measures

See L.1. INTERSECTION CAPACITY.

3. DATA, RESOURCES, AND REFERENCES

See L.1. INTERSECTION CAPACITY.

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[&]quot;Final LOS" is defined as projected future conditions including project, ambient, and related project growth, but without project traffic mitigation.

Exhibit L.2-1 LEVEL OF SERVICE (LOS) DEFINITIONS FOR ARTERIAL STREET SEGMENTS

LOS	Volume to capacity (V/C) Ratio	Definition
A	0.000 - 0.600	EXCELLENT. Primarily free-flow conditions at about 90 percent of free-flow speed. Vehicles are completely free to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal.
В	0.601 - 0.700	VERY GOOD. Reasonably unimpeded flow at about 70 percent of free-flow speed. Ability to maneuver is only slightly restricted and delay at intersections is not bothersome.
С	0.701 - 0.800	GOOD. Stable operations at about 50 percent of free-flow speed. Ability to maneuver and change lanes may be restricted at mid-block locations. Motorists will begin to experience appreciable tension while driving.
D	0.801 - 0.900	FAIR. Small increases in flow begin to cause substantial increases in intersection approach delay. Ability to maneuver becomes more difficult, with speeds about 40 percent of free-flow speed.
Е	0.901 -1.000	POOR. Characterized by significant delays at intersection approaches and travel speeds about one-third of free-flow speed or less. Ability to maneuver is severely restricted and driver tension is high.
F	> 1.000	FAILURE. Extremely low travel speeds and unstable traffic flow. Characterized by long delays at intersection approaches, severe difficulty in maneuvering between lanes, and extremely high driver tension.

Source: Adapted from Transportation Research Board (TRB), Highway Capacity Manual, Special Report 209, Third Edition, 1994.

L.3 FREEWAY CAPACITY

1. INITIAL STUDY SCREENING PROCESS

A. **Initial Study Checklist Questions**

- XV.a): Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?
- XV.b): Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

В. Introduction

This issue involves the ability of a freeway segment or a freeway on- or off-ramp to accommodate increased vehicular traffic demands associated with a proposed project. The impact typically results from the addition of new traffic generated by a project. The impact is measured in terms of the project's effect on freeway operating conditions expressed as level of service (LOS) and demand to capacity (D/C) ratio. On- and off-ramps, similar to street segments, are evaluated in terms of volume to capacity (V/C) ratios and LOS.

Freeway capacity impacts can be evaluated for both short-range development projects and long-range projects for which details, such as site access points, are not yet known. Freeway capacity impacts are typically evaluated for permanent traffic increases after project completion, but can also be evaluated for temporary traffic increases generated during project construction. The future year to be analyzed should be consistent with that analyzed in the intersection capacity or street segment capacity analysis.

The California Department of Transportation (Caltrans) is responsible for the construction and operation of state highways and interstate freeways. Traffic congestion is monitored regionally by the County Transportation Commissions (Los Angeles County Metropolitan Transportation Authority (Metro)), according to state requirements.

C. Screening Criteria

- Would the proposed project add 150 or more one-way vehicle trips to a Congestion Management Program (CMP) mainline freeway monitoring segment during either the a.m. or p.m. peak hours?
- Would the proposed project add 50 or more a.m. or p.m. peak hour trips to a freeway on- or off-ramp?

A "yes" response to any of the preceding questions indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Freeway Capacity and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Freeway Capacity from the proposed project.

D. Evaluation of Screening Criteria

Estimate the number of trips to be generated by the proposed project using the trip generation and distribution methodologies in L.1. INTERSECTION CAPACITY and compare to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant freeway capacity impact if project traffic causes an increase in the D/C ratio on a freeway segment or freeway on- or off-ramp of 2 percent or more capacity (D/C increase >0.02), which causes or worsens LOS F conditions (D/C >1.00).

B. Methodology to Determine Significance

Environmental Setting

Describe the existing traffic conditions based on the appropriate study area, time periods, existing transportation facilities, traffic counts, and LOS.

Study Area and Time Periods to be Analyzed. Identify the geographic study area (i.e., freeway segments and on- or off-ramp(s) to be analyzed) based on project size, type, location, and existing levels of traffic.

For most projects, analyze existing traffic for both the a.m. and p.m. weekday peak hours. For some projects, other time periods, such as mid-day or weekend periods, may be required if those are expected to be the prime periods of trip generation (e.g., for a recreational project).

Existing Setting. Inventory existing traffic conditions, including the following:

- A description of the freeway system serving the study area (i.e., number of lanes, location of interchanges and ramps serving study area, etc.); and
- Existing peak hour traffic volumes on study freeway segments and on- and offramps.

Existing freeway traffic counts can be obtained from the most recent CMP or Caltrans. Traffic counts should not be older than two years.

Freeway Capacity Methodology. Quantify the existing peak hour D/C ratios and LOS at the study freeway segments by dividing peak hour directional traffic volumes by the directional freeway segment capacity (determined by multiplying the number of mainline freeway lanes with a per lane capacity value of 2,000 vehicles per hour) to calculate a D/C ratio, which is then used to determine LOS. Exhibit L.3-1 shows LOS definitions for freeway segments. This is the methodology described in the Congestion Management Program (CMP).

On- and Off-Ramp Methodology. Calculate V/C ratios and LOS for study on- and off-ramps.¹ Traffic counts may be obtained from Caltrans, Metro, Los Angeles Department of Transportation (LADOT), field counts, or other appropriate methods. Ramp capacity is a function of the number of lanes, their configuration, and road geometry. LOS definitions for on- and off-ramps are the same as arterial street segments (Exhibit L.2-1).²

See Transportation Research Board's (TRB) Highway Capacity Manual, Special Report 209. Third Edition, 1994

See L.2. STREET SEGMENT CAPACITY.

Project Impacts

Estimate the project trips to be added to freeway segments and on- and off-ramps using the trip generation and distribution methodologies in L.1. INTERSECTION CAPACITY, or L.2. STREET SEGMENT CAPACITY, as appropriate. Add to the future cumulative base levels and compare the resulting LOS and D/C ratio to the significance threshold to determine project impacts.

Cumulative Impacts

Follow the methodologies presented in L.1. INTERSECTION CAPACITY, or L.2. STREET SEGMENT CAPACITY, as appropriate. Future base traffic volumes may also be calculated by using the traffic growth factors provided in the most recent edition of the CMP, through consultation with Caltrans, or through subarea modeling.

Cumulative Plus Project Impacts

Add project traffic volumes at freeway segments and on- and off-ramps to the cumulative base levels. Compare the resulting LOS and D/C ratios to the Significance Threshold.

Sample Mitigation Measures

See L.1. INTERSECTION CAPACITY.

3. DATA, RESOURCES, AND REFERENCES

See L.1. INTERSECTION CAPACITY.

Exhibit L.3-1 LEVELS OF SERVICE (LOS) FOR FREEWAY SEGMENTS

Level of Service (LOS)	Demand to Capacity (D/C) Ratio	Service Rating	Flow Conditions
A	0.00 - 0.35	Good	Operating speed of 55+ mph. No delay. Highest quality of service. Free traffic flow, low volumes and densities. Little or no restriction on maneuverability or speed.
В	>0.35 - 0.54	Good	Operating speed of 50 mph. Minimal delay. Stable traffic flow, speed becoming slightly restricted. Low restriction on maneuverability.
С	>0.54 – 0.77	Adequate	Operating speed of 45 mph. Minimal delay. Stable traffic flow, but less freedom to select speed, change lanes, or pass. Density increasing.
D	>0.77 – 0.93	Adequate	Operating speed of 40 mph. Minimal delay. Approaching unstable flow. Speed tolerable but subject to sudden and considerable variation. Less maneuverability and driver comfort.
Е	>0.93 – 1.000	Poor	Operating speed of 35 mph. Significant delays. Unstable traffic flow with rapidly fluctuating speeds and flow rates. Short headways, low maneuverability and low driver comfort.
F	>1.000	Poor	Operating speed up to 20 mph. Considerable delays. Forced traffic flow. Speed and flow may drop to zero with high densities.

Source: Adapted from CMP for Los Angeles County, LACMTA, 2004

L.4. NEIGHBORHOOD INTRUSION IMPACTS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

Would the project cause an increase in traffic which is substantial in relation to the XV.a): existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

B. Introduction

This issue involves impacts of traffic generated by the project, and/or traffic diverted or shifted due to the project, on local streets in residential neighborhoods. Such impacts may result from increased traffic volumes on neighborhood streets or increased delays for vehicles exiting the neighborhood. Traffic conditions are typically expressed in terms of daily volume of traffic.

Evaluation of potential neighborhood intrusion impacts requires details regarding site access. Impacts are related to traffic volume, location of site access points in relation to neighborhood streets, traffic controls, and capacity of area streets. Neighborhood intrusion impacts are typically evaluated for permanent traffic increases after project completion, but can also be evaluated for temporary traffic increases during project construction. Analyze the same future year that is analyzed in the intersection capacity analysis. The Los Angeles Department of Transportation (LADOT) may require a Residential Neighborhood Traffic Management Program be prepared for certain projects. Contact LADOT for further information.

C. Screening Criteria

Would the proposed project:

Generate more than 120 daily vehicle trips to a local residential street?

A "yes" response to the preceding question indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the

Significance Threshold for Neighborhood Intrusion Impacts, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Neighborhood Intrusion from the proposed project.

D. Evaluation of Screening Criteria

The potential for neighborhood intrusion is generally based on preliminary trip generation and distribution and the location of project access points relative to local residential streets. Use the project traffic study or see L.1. INTERSECTION CAPACITY for trip generation and distribution methodologies and compare the results to the Screening Criteria. Identify the number of trips distributed to local neighborhood streets. Also, identify points at which project traffic could impact a local residential street located adjacent to, or across an arterial from, the project.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant neighborhood intrusion impact if project traffic increases the average daily traffic (ADT) volume on a local residential street in an amount equal to or greater than the following:

```
ADT increase \geq 16% if final ADT* <1,000
ADT increase \geq12% if final ADT* \geq1,000 and <2,000
ADT increase \geq10% if final ADT* \geq2,000 and <3,000
ADT increase \geq8% if final ADT* \geq3,000
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* "Final ADT" is defined as total projected future daily volume including project, ambient, and related project growth.

The significance of neighborhood intrusion impacts related to vehicle delay shall be determined on a case-by-case basis.

B. Methodology to Determine Significance

Environmental Setting

Describe existing traffic conditions based on the appropriate study area, time periods, existing transportation facilities, traffic counts and level of service (LOS), as detailed below.

Study Area and Time Periods to be Analyzed. Determine the residential street segments to be analyzed, based upon consideration of the potential trip generation of the project, the location of project access points, and the residential streets which are most likely to be affected. Residential neighborhood intrusion impacts are measured in terms of daily traffic volumes.

Existing Setting. Describe existing traffic conditions, including the existing residential streets to be included in the study (i.e., number of lanes, traffic control devices, on-street parking, etc.) and existing daily traffic volumes on the analyzed residential streets. Traffic counts should not be older than two years.

Project Impacts

Use the project traffic study or use the methodology in L.1. INTERSECTION CAPACITY to estimate the daily trip generation and distribute it on the street system to forecast the amount of project traffic which may travel along the analyzed residential streets. Determine the project impact by comparing the projected cumulative base and cumulative plus project ADT volumes for the analyzed residential streets and comparing the result to the Significance Threshold

Cumulative Impacts

Develop cumulative base daily traffic forecasts for the analyzed residential streets, considering both the proposed project and related projects, using the methodology in L.1. INTERSECTION CAPACITY. Determine the resulting impact.

Sample Mitigation Measures

Similar to intersection capacity impacts, potential mitigation measures for neighborhood intrusion impacts can include Transportation Demand Management (TDM) measures to reduce overall traffic levels, transportation system management (TSM) measures or physical improvements on arterial streets to encourage travel on non-residential streets (as listed in L.1. INTERSECTION CAPACITY). In addition, neighborhood traffic control measures can be implemented as mitigation measures to discourage travel on local residential streets. Specific mitigation measures are generally determined through consultation with LADOT, the appropriate City Council office, and the community. Neighborhood traffic control measures include:

- Speed humps;

- Signalized mid-block pedestrian crosswalks;
- Traffic signal timing modifications;
- Additional stop signs;
- Speed limit reductions;
- Diverters or semi-diverters;
- Cul-de-sac or street closure;
- Chokers or narrowing of street widths; and
- Turn restrictions.

In addition, LADOT may require a Residential Neighborhood Traffic Management Program be prepared. Contact LADOT for further information.

3. DATA, RESOURCES, AND REFERENCES

American Society of Civil Engineers , **Residential Streets Task Force**, Stanford P. LaHue, Sr., chmn., Residential Streets, Second Edition, 1990.

Institute of Transportation Engineers (ITE), Residential Street Design and Traffic Control, 2001.

See also L.1. INTERSECTION CAPACITY.

L.5. PROJECT ACCESS

1. INITIAL STUDY SCREENING PROCESS

Α. **Initial Study Checklist Questions**

- Would the project increase hazards due to a design feature (e.g. sharp curves or XV.d): dangerous intersections) or incompatible uses (e.g. farm equipment)?
- Would the project result in inadequate emergency access? XV.e):
- Would the project conflict with adopted policies, plans or programs supporting XV.g): alternative transportation (e.g., bus turnouts, bicycle racks)?

B. Introduction

Project access impacts relate to the provision of access to and from the project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicular/vehicular, vehicular/bicycle or vehicle/pedestrian conflicts as well as to operational delays caused by slowing and/or queing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveways in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of project access impacts requires details regarding land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion, but can also be evaluated for temporary conditions during project construction. See K.2 FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES for impacts related to emergency vehicles.

Project access can be analyzed in qualitative and/or quantitative terms, in conjunction with a review of internal site circulation and access to parking areas. In addition, peak hour LOS may be quantified for primary site access points, as necessary, using the procedures discussed previously in L.1. INTERSECTION CAPACITY.

C. **Screening Criteria**

Would the proposed project generate 500 or more daily trips or 43 or more vehicle trips during either the a.m. or p.m. peak hours?

If yes, would any of the following occur:

- Is a project driveway proposed on a major or secondary highway within 150 feet of an intersection with another major or secondary highway?
- Would a project driveway intersect an on-street bicycle lane or cross a sidewalk in an area of high pedestrian activity?
- Can it be readily perceived that there are access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls or other barriers to adequate lines of sight?

A "yes" response to the first question <u>and</u> one of the other three questions indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Project Access, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the first question and <u>all</u> of the following questions indicates that there would normally be no significant Project Access impacts from the proposed project.

D. Evaluation of Screening Criteria

Identify the estimated number of daily and peak hour trips the project would generate using the project traffic study or the methodology in L.1. INTERSECTION CAPACITY. Review project site plans and the existing transportation facilities (including bicycle and pedestrian facilities) surrounding the project site. Roadway classifications are noted in the Transportation Element, or consult with Los Angeles Department of Transportation (LADOT). LADOT can also advise regarding access risks or deficiencies that may contribute to unsafe conditions. For projects in areas of potentially high pedestrian activity, consider performing a pedestrian capacity or LOS analysis. Compare the results to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

Project Access (operational)

A project would normally have a significant project access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the a.m. or p.m. peak hour, under cumulative plus project conditions.

Bicycle, Pedestrian and Vehicular Safety

The determination of significance shall be on a case-by-case basis, considering the following factors:

- The amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/ bicycle or vehicle/vehicle impacts.

В. **Methodology to Determine Significance**

Environmental Setting

Determine the existing LOS at the intersections nearest the project site (see the traffic study or L.1. INTERSECTION CAPACITY, as appropriate). Describe existing traffic facilities and conditions, including bicycle lanes and/or paths and sidewalks with regular pedestrian activity. Note the distance between site access points and arterial intersections and other conditions (such as curves or grade changes) that may affect traffic safety.

Project Impacts

To identify operational access impacts, use the methodology described in L.1. INTERSECTION CAPACITY and calculate the cumulative plus project volume to capacity (V/C) ratio at the intersection(s) nearest the project access by estimating project-generated trips and adding to the cumulative base projections. Determine the corresponding LOS for the a.m. and p.m. peak hours and compare to the significance threshold.

For vehicle/vehicle and bicycle and pedestrian safety impacts, review all project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project

driveway(s)). Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), consider operational and safety issues related to the potential for vehicular/pedestrian and vehicular/bicycle conflicts and the severity of consequences that could result. In areas with high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required.

Cumulative Impacts

Review the related projects or growth assumptions for projects that could impact the same street segments or intersections as the proposed project. For qualitative assessments, review project site access plans for projects that would impact the same primary intersections, bicycle routes or pedestrian facilities as the proposed project. Determine the combined impact and the project's contribution.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Installation of a traffic signal or stop signs or electronic warning devices at site access points;
- Redesign and/or relocation of project access points;
- Redesign of the internal (on-site) circulation system;
- Installation of stop-signs and pavement markings internal to the site; and
- Restrict or prohibit turns at site access points.

3. DATA, RESOURCES, AND REFERENCES

Institute of Transportation Engineers (ITE), Guidelines For Driveway Location & Design, 1987.

See also L.1. INTERSECTION CAPACITY.

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L.6. TRANSIT SYSTEM CAPACITY

1. **INITIAL STUDY SCREENING PROCESS**

Initial Study Checklist Question

VI.h): Would the proposal result in a substantial impact upon existing transportation systems?

Introduction

This issue involves the potential impacts of the proposed project on the existing transit system ridership and capacity from the increased demand by project residents, employees, patrons, etc. Where project details are known, impacts are evaluated on specific transit lines. Where specific development sizes and land use are not known, analyses can be at a more generalized level for the project area. Transit system capacity impacts are typically evaluated for permanent impacts after project completion.

C. Screening Criteria

Will an Environmental Impact Report (EIR) be prepared for the proposed project to evaluate potential transportation impacts?

A "yes" response to the preceding question indicates that further study of this issue may be required. Refer to the Significance Threshold for Transit System Capacity, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that no further review of Transit System Capacity would normally be required.

D. Evaluation of Screening Criteria

Review the description of the proposed project and the CEQA determination for other transportation impacts. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the proposed project and available transit capacity.

B. Methodology to Determine Significance

Environmental Setting

Describe the public transit system serving the study area, including both existing and planned bus, rail, and paratransit systems. Include all local fixed route transit services within a ¹/₄ mile radius of the proposed project site, and express bus routes and passenger rail services within a two mile radius of the project site.

Project Impacts

Use the traffic study to identify the estimated number of daily and peak hour trips to be generated by the proposed project and the mode split analysis to determine the number of transit trips expected. If this has not been done, use the methodology in the trip generation section of L.1. INTERSECTION CAPACITY, or the most recent Congestion Management Program (CMP).

Identify the expected impacts; consult with the affected transit operators as needed. The transit operator (Los Angeles Department of Transportation (LADOT) or other) may request additional information in response to the Notice of Preparation (NOP). Note any design or program elements of the project, if any, that will encourage public transit use, including the applicable requirements of the City's Transportation Demand Management (TDM) Ordinance and any project-specific measures that will enhance capacity or support transit use (i.e., employee shuttles, van pools).

Cumulative Impacts

Identify the related projects which would use any of the same systems or transit lines as the proposed project. Assess the combined impact of the proposed and related projects and the project's proportional contribution to the cumulative demand using the methodology described above for Project Impacts.

Sample Mitigation Measures

Mitigation measures for transit impacts could occur at either the project or transit operator level. The following are some options to consider; all would require coordination with the transit operator and/or LADOT.

Measures Implemented by Project:

- Install bus stop shelters, benches, or other amenities;
- Provide new private transit service (e.g., employee shuttles, private commuter express services);
- Contribute facilities, equipment, or funds to increase the capacity of existing transit systems, add stations, upgrade traffic signals to allow for Transit Priority Systems, or expedite transit flow; and
- Provide concrete bus pads at bus stops.

Measures Implemented by Transit Operator:

- Minor re-routing of public transit line;
- Increased frequency of public transit service; and
- Provide new public transit service.

3. DATA, RESOURCES, AND REFERENCES

See L.1. INTERSECTION CAPACITY.

L.7. PARKING

1. INITIAL STUDY CHECKLIST PROCESS

A. **Initial Study Checklist Question**

Would the project result in inadequate parking? XV.f):

Introduction B.

Parking impacts can result from the provision of an insufficient parking supply to serve a project. Such impacts can be manifested by spillover of project parking demands to nearby on-street or off-street parking facilities. Concerns often arise if project parking demands intrude into nearby residential neighborhoods.

Parking impacts are analyzed for projects when details regarding land use, size, proposed parking supply and internal layout, etc., are known. Parking impacts are typically evaluated for permanent conditions after project completion. To evaluate temporary conditions during project construction, see L.8 IN-STREET CONSTRUCTION IMPACTS.

C. **Screening Criteria**

- Would the project's proposed parking supply be less than that required by City code, including Los Angeles Municipal Code (LAMC), Transportation Specific Plan (TSP) or Interim Control Ordinance (ICO) requirements, prior to applying for a variance, exemption, or amendment, if any apply to the project?
- If the project is located within the coastal zone (generally, 1000 yards inland of the mean high tide line), would the project's proposed parking supply be less than that required by California Coastal Commission requirements?

A "yes" response to any of the preceding questions indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Parking, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Parking impacts from the proposed project.

D. **Evaluation of Screening Criteria**

Review the description of the proposed project. Apply the appropriate City parking requirements (including LAMC, TSP, ICO, Specific Plan (SP) or Transit Oriented District (TOD) requirements, if any) to the proposed project land uses to determine the required amount of parking. Determine California Coastal Commission requirements if the project is located within the coastal zone. Compare these amounts to the proposed parking supply and review the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

Α. **Significance Threshold**

A project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project.

В. **Methodology to Determine Significance**

Environmental Setting

Describe the existing parking supply in the vicinity of the proposed project, including both on-street and off-street parking. Also note any existing parking on the project site. Include a summary of current parking utilization within ½ mile of the project site if the project proposes using other off-street or on-street parking spaces to meet the code requirements.

Project Impact

Demand Analysis. There are several factors which can affect the actual parking demand for a project. Depending upon individual project characteristics, one or more of the following specialized demand analyses could be performed:

Transit Mode Split Discount - City parking requirements can be adjusted downward to reflect prevailing or projected transit ridership, to account for an existing or proposed transit/rail station in proximity to the project or if the project is located in an area with a high level of transit service. The LAMC

indicates that a reduction of up to 40 percent in parking requirements can be assumed for a project located at a rail station. (Also, see mode split discussion in trip generation section of L.1. INTERSECTION CAPACITY for relevant details.)

- Effect of Captive Market The proximity of several land use types in a mixeduse development creates a potential for a captive market. Closeness facilitates walking between activities rather than using a vehicle, potentially reducing parking demands. The following sources are available to assist in estimating captive market reductions:
 - National Cooperative Highway Research Program (NCHRP) Report 323 -Travel Characteristics at Large-Scale Suburban Activity Centers;
 - Trip Generation; and
 - Urban Land Institute's (ULI) Shared Parking.
- Shared Parking There is also a potential for shared use of parking spaces in mixed use or other projects. The shared use concept considers the fact that the peak parking demand does not occur simultaneously for the various land use elements. The shared parking model incorporates standardized hourly accumulation factors by land use types which represent the percentage of peak parking demand generated during each hour of the day. Use the methodology presented in the publication Shared Parking. The shared parking concept can also account for seasonal variations, using factors contained in Shared Parking.
- Parking Demand Rates If, due to unique land uses or characteristics of the project (e.g., mixed use, senior housing), the City parking requirements are not considered appropriate for a project, other sources could be used to determine the peak parking demands for the project, including:
 - Shared Parking;
 - Institute of Transportation Engineers' (ITE) Parking Generation;

- **Parking** demand empirically derived parking rates from utilization/duration surveys conducted at similar facilities in similar areas;
- Explicit derivation of parking demand based upon estimation of person trip generation and mode split.

Compare parking demand from one of the above methods to the proposed parking supply.

Cumulative Impacts

Identify the related projects which would utilize the same on-street or off-street parking facilities as the proposed project. Consider any deficiencies in the proposed parking supply. Evaluate the combined impact of the related and proposed projects.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Develop and implement an aggressive transportation demand management (TDM) plan. TDM measures, which result in fewer vehicles traveling to and from a project, such as increased ridesharing and increased transit use, also reduce parking needs (see L.1. INTERSECTION CAPACITY for further discussion of TDM measures):
- Modify the project to provide additional on-site parking;
- Enter into agreements with owners of nearby parking facilities to use their facilities as project parking; and
- Provide employee parking at a remote off-site location connected to the project site with a shuttle bus service.

3. DATA, RESOURCES, AND REFERENCES

Planning and Zoning Code, (Chapter 1 of the LAMC), Parking requirements, ICOs, TSPs, Local Coastal Plans. Available from the City Planning Department's Central Publications Unit at 200 N. Spring Street, Los Angeles, California 90012; Telephone: (213) 978-1255.

ITE, Manual of Traffic Engineering Studies, 2001.

ITE, Parking Generation, 3rd Edition, 2004.

ULI and the National Parking Association, The Dimensions of Parking, Fourth Edition, 2000.

See also L.1. INTERSECTION CAPACITY.

L.8. IN-STREET CONSTRUCTION IMPACTS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

XV.a): Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

XV.e): Would the project result in inadequate emergency access?

B. Introduction

This impact category addresses major in-street construction activity of an extended duration that is not exempt from the CEQA process.¹ This category also includes impacts associated with projects requiring major construction activity within a street right-of-way (ROW), such as temporary loss of access to adjacent parcels, temporary loss of bus stops, and temporary loss of on-street parking. (Off-street parking is addressed in L.7. PARKING.) Impacts associated with in-street construction activity are evaluated when details, such as the location, duration, and type of construction activity within the street ROW, are known. Given that these impacts are temporary and generally occur early in the project construction phase, the analyses are based on existing or near-term conditions. The Los Angeles Department of Transportation (LADOT) may require a traffic control plan whether or not project impacts are deemed to be significant. See K.2. FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES for impacts related to emergency vehicles.

C. Screening Criteria

• Would a project not exempted in Article VII of the City CEQA Guidelines require construction activities to take place within a major or secondary highway ROW which would necessitate temporary lane, alley, or street closures for more than one day (including day and evening hours, and including overnight closures if on a residential street)?

See City of Los Angeles CEQA Guidelines, Article VII, Categorical Exemptions.

- Would a non-exempt project require construction activities to take place within a collector or local street ROW which would necessitate temporary lane, alley, or street closures for more than seven days (including day and evening hours, and including overnight closures if on a residential street)?
- Would in-street construction activities result in the loss of regular vehicular or pedestrian access to an existing land use for more than one day, including day and evening hours and overnight closures if access is lost to residential units?
- Would in-street construction activities result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the project site?

A "yes" response to any of the preceding questions indicates that further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for In-Street Construction Impacts, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact from In-Street Construction of the proposed project.

D. Evaluation of Screening Criteria

Review project construction plans to determine whether construction activities would result in street closures, blocked access or the loss or rerouting of transit stops. Determine the classification of street affected based upon width and average daily traffic, or contact LADOT for assistance. Identify bus stops and bus routes that serve the project construction area. Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

Temporary Traffic Impacts:

- The length of time of temporary street closures or closures of two or more traffic lanes;
- The classification of the street (major arterial, state highway) affected;
- The existing traffic levels and level of service (LOS) on the affected street segments and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.

Temporary Loss of Access:

- The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- The availability of alternative vehicular or pedestrian access within \(\frac{1}{4} \) mile of the lost access; and
- The type of land uses affected, and related safety, convenience, and/or economic issues.

Temporary Loss of Bus Stops or Rerouting of Bus Lines:

- The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;

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- The existence of other bus stops or routes with similar routes/destinations within a 1/4 mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

Temporary Loss of On-Street Parking:

- The current utilization of existing on-street parking;
- The availability of alternative parking locations or public transit options (e.g. bus, train) within 1/4 mile of the project site; and
- The length of time that existing parking spaces would be unavailable.

B. **Methodology to Determine Significance**

Environmental Setting

Describe the physical setting, including the classification of adjacent streets, on-street parking conditions in the immediate vicinity of the construction project, a description of the land uses affected by construction, and an inventory of existing bus stops and transit lines within a ½ mile radius of the construction site. See L.1. INTERSECTION CAPACITY if construction impacts on intersection operating conditions are to be evaluated. See L.2. STREET SEGMENT CAPACITY if construction impacts on street segment operating conditions are to be evaluated.

Project Impacts

Review proposed construction procedures/plans to determine whether construction activity within the street ROW would require any of the following:

- Street or lane closures;
- Block existing vehicle or pedestrian access to parcels fronting the street;
- Closure or movement of an existing bus stop or rerouting an existing bus line;

- Removal of existing, heavily used, on-street parking spaces; or
- Creation of traffic hazards.

Compare the results to the significance factors to determine the level of impact. Consider safety and economic concerns, existing traffic levels, as well as congestion impacts.

Intersection and/or street segment capacity analyses may be used to determine whether street construction would result in significant impacts on the LOS. Project impacts would be determined by comparing the intersection or street segment LOS for pre-construction and construction conditions, which could incorporate expected traffic shifts.

Cumulative Impacts

Review the related projects list for those proposals with concurrent construction schedules. Identify those projects that would impact the same streets, bus stops, bus routes, parking spaces and/or access points. Determine the impact of the related projects in combination with that of the proposed project.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Traffic management plan;
- Detour plan:
- Modification of construction procedures (e.g., cut-and-cover techniques rather than open cut techniques);
- Limit major road traffic obstructions to off-peak hours;
- Coordinate with emergency service and public transit provider agencies;
- Provide alternative vehicular and/or pedestrian access to affected parcels;
- Coordinate access with adjacent property owners and tenants;

- Provide advance notification of temporary bus stop loss and/or bus line relocation;
- Provide and sign temporary bus stops within a reasonable walking distance of closed bus stops;
- Identify temporary alternative bus route(s), and provide and sign bus stops along that route;
- Provide advance notice of temporary parking loss; and
- Identify temporary parking replacement or alternative adjacent parking within a reasonable walking distance.

3. DATA, RESOURCES, AND REFERENCES

Public Works Standards Inc., Work Area Traffic Control Handbook, Ninth Edition, 2003

California Department of Transportation (Caltrans), State of California Manual of Traffic Controls for Construction and Maintenance Work Zones, 1990.

Federal Highway Administration (FHWA), Manual on Uniform Traffic Control Devices (MUTCD), Revision 1, 2003.

FHWA, National Highway Institute, Design and Operation of Work Zone Traffic Control, Participant Notebook, 1987.

See also L.1. INTERSECTION CAPACITY.

M. PUBLIC UTILITIES

City of Los Angeles L.A. CEQA Thresholds Guide

M.1. WATER

1. INITIAL STUDY SCREENING PROCESS

Initial Study Checklist Questions

Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

XVI.d): Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Introduction В.

Potable water is provided in the City by the Los Angeles Department of Water and Power (LADWP). The City receives a significant portion of its supply from the Metropolitan Water District of Southern California (MWD). Additional information on the City's water supply and distribution infrastructure is provided in 3. Data, Resources, and References.

The quantity of water consumed by a project is determined by several factors, including the size, type and characteristics of a project. The need for construction of new or replacement water facilities (e.g., reservoirs, storage tanks, water mains, filtration plants, pumps, wells, and other connections or distribution facilities) would depend on the existing capacity and anticipated demand for the project area.

The Federal government has mandated low-flush toilets via the Energy/Policy act of 1992. The City of Los Angeles Ordinance Nos. 163,532 and 164,093, adopted in 1988, require new buildings to utilize low-flush toilets and urinals (1.5 gallons per flush) in order to obtain building permits. In addition, Title 20 of the California Administrative Code (CAC) Section 1604 establishes efficiency standards (i.e., maximum flow rates) for all new showerheads, lavatory faucets, and sink faucets and prohibits the sale of fixtures that do not comply with the regulations. City Ordinance No. 163,532 also contains provisions requiring xeriphytic (low-water consumption) landscaping.

Under Senate Bill 901, (Public Resources Code (PRC) and California Water Code (CWC) 10910), effective January 1, 1996, when a lead agency prepares a notice of preparation (NOP) for an EIR for projects of a certain size, the water agency must assess whether the water demand anticipated for the project is covered by the water agency's master water management plan. If the water agency concludes that supplies are insufficient, it must provide the lead agency with: its plans for additional water supplies, including estimated total costs and financing methods associated with acquiring additional water supplies; all federal, state, and local permits, approvals, or other entitlements necessary to acquire or develop the additional water supplies; and estimated timeframes for acquiring the additional water supplies. This information is then incorporated into the project's environmental documentation.

LADWP updates its Urban Water Management Plan every five years to account for changing conditions. This Plan projects water supply and distribution needs based on anticipated growth in population, housing, and employment and identifies water supply strategies to meet this demand. LADWP currently expects to have adequate water supplies for all anticipated development in the City.

C. Screening Criteria

- Would implementation of the proposed project cause the Community Plan area to exceed the projected growth in population, housing, or employment for the year of project occupancy/buildout?
- Would the project's water consumption require the construction of additional off-site water infrastructure?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Water, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Water from the proposed project.

Evaluation of Screening Criteria

Review the description of the proposed project, project site, and adjacent or surrounding area, including water infrastructure serving the area. Determine whether new off-site water infrastructure

would be required to meet project needs. Consult with LADWP as necessary. Infrastructure could include water mains, storage tanks, reservoirs, filtration plants, pumps, wells, and other connections or distribution facilities. Based on the project land use types, determine the population, housing units, and employment to be generated by the project. Add this to existing levels and compare to the totals projected in the Community Plan for the year of project occupancy. Consult with the City Planning Department as needed. Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

В. **Methodology to Determine Significance**

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of major water infrastructure serving the project site, including the type of facilities, location and sizes, and any planned improvements;
- Description of the water conditions for the project area and known improvement plans; and

• The existing population, housing, and employment for the Community Plan area in which the project site is located.

Project Impacts

Review the project description and the information from the Environmental Setting and Evaluation of Screening Criteria. Determine what improvements would be needed, if any, to adequately serve the project. Describe the degree to which presently scheduled off-site improvements offset impacts. As necessary, consult with LADWP or the latest Urban Water Management Plan.

Consider the water conditions for the project area, known improvement plans, and the project's water demand. The project's water demand can be calculated on the basis of estimated population and per capita demands (for residential land uses), unit demand factors by acre (for residential and non-residential land uses), or from a direct analysis of facilities and fixtures (for non-residential land uses). For planning purposes, LADWP generally forecasts demand based upon population trends and average per capita factors. LADWP does not maintain any standard unit demand factors for specific types of land uses. Residential demands can be approximated based upon LADWP per capita data. The average FY 2001-2002 residential water demand was estimated at 101 gallons per capita per day (gpcd), derived by dividing total residential water use by total estimated population within LADWP's service area. This is based upon the combined Citywide mix of multiple family and single family dwelling units. In general, demand from single-family units tends to be higher, primarily because of a higher rate of outside water use for landscaping. Water demand from multifamily units tends to be lower than this average. MWD may also be consulted for typical water demand factors.

Any water conservation measures included in the proposed project, particularly those that are beyond requirements of present regulations, should be described and their impact on water use factored into the project demand, to the extent possible. These would include such measures as water reuse, drip irrigation systems, and/or computerized (moisture-sensitive) irrigation systems.

If not done under Evaluation of Screening Criteria, determine the change in population, housing units, and employment generated by the project. Compare these figures to the totals projected in the Community Plan for the year of project occupancy. Consult with the City

LADWP, Urban Water Management Plan, Fiscal Year 2001-2002 Update.

Planning Department as needed. Determine the impact from growth which exceeds the projections.

<u>Cumulative Impacts</u>

Review the list of related projects. Identify those that would utilize the same water infrastructure. Using the methodology described above in Project Impacts, determine the combined effect of the related projects and the proposed project on water infrastructure and the growth in population, housing and employment projected in the Community Plan.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Incorporate a recirculating hot water system to reduce waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet. Use tankless water heaters:
- Retrofit other buildings within the City to offset the net water consumption induced by the proposed project;
- Use reclaimed water as a source for project irrigation systems;
- Set automatic irrigation systems to irrigate during early morning or evening hours to minimize water loss due to evaporation and reset to water less in cooler months and during rainfall season;
- Use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray;
- Practice xeriscaping that exceeds City requirements;
- Recycle all water used in cooling systems to the maximum extent possible;
- If a fleet will be maintained, incorporate a water recycling system in on-site facilities for washing vehicles; and
- Perform regular preventive maintenance on all pumps, valves, and piping, in the project's water system to minimize water waste.

3. DATA, RESOURCES, AND REFERENCES

LADWP, Water Supply Division, Water Resources Unit, 111 North Hope Street, Los Angeles, California 90012; Telephone: (213) 367-2661. Current information on annual Citywide water consumption can be obtained from annual reports prepared by LADWP, or by contacting the Water Supply Division directly.

City of Los Angeles Landscape Ordinance (No. 170,978) establishes consistent landscape standards for projects, including water management, conservation and xeriscape.

The Urban Water Management Plan (UWMP) for the City of Los Angeles is prepared every five years and contains data regarding future water demand projections, water supply sources, and other water system planning information. (Available through LADWP.)

Fiscal Year 2001-2002 Annual UWMP update for questions call (213) 367-0800.

Environmental and Public Facilities Maps (1996):

- Potable Water Distribution System; and
- Potable Water Delivery System Service Areas.

Water Supply and Distribution Background Information

LADWP is responsible for supplying water within the City limits, and for ensuring that the delivered water quality meets applicable California health standards for drinking water. Total Citywide 2002 potable water demand was estimated at 670,099 acre feet (AF), and is projected to be about 749,900 AF by the year 2015.²

LADWP's water supply comes from these sources: local groundwater, reclaimed water, Owens Valley water, Colorado River Water, and California Aqueduct Water. Local groundwater is produced primarily from wells in the San Fernando Valley, and provides approximately 11 percent of the total supply during fiscal year 2001-2002. Two Owens Valley aqueducts owned by the City bring water from the eastern slopes of the High Sierras. Historically, the Owens Valley supplied a large majority of the City's water supply, but the amount of this source that the City can divert has been significantly reduced as a result of the settlement of environmental litigation. Most of the

² LADWP, Urban Water Management Plan, June 1995.

remainder of the water supply is purchased from MWD and delivered either from the Colorado River or from the Sacramento-San Joaquin Delta via the California Aqueduct.

LADWP has instituted significant water conservation measures that were particularly successful in reducing demands during drought. In 1995, reclaimed water supplied about 3,000-4,000 AF of water (about six percent of total demand), and the City expects to supply up to 12 percent (90,000 AF) of its total water demand with reclaimed water by the year 2015.

LADWP supplies water that meets or exceeds all health-related state and federal standards, accomplished in part in the following ways: (1) filtration of the Los Angeles Aqueduct supply at a state-of-the-art treatment plant; (2) control of access to water supply and storage areas; (3) control of algae growth and/or covering of reservoirs; (4) continuous disinfection of water entering mains; and (5) water quality testing, inspection, cross-control prevention, and older main replacement.

Water supply infrastructure includes water storage facilities, transmission and distribution pipelines, booster pumping stations, pressure reducing stations, and other related facilities. Water storage is essential for the conservation of water to supply daily peaks, meet high demand conditions, and provide for firefighting and emergencies. The City water system has 110 tanks and reservoirs ranging in size from 10 thousand to 60 billion gallons with a total capacity of 109 billion gallons. Water is distributed through a network of over 7,200 miles of water mains ranging from 4 inches to 120 inches in diameter. Because of the size and range in elevation (0 to 2,400 feet) the system has been divided into 102 pressure zones, with almost 90 booster pumping stations to provide water service at higher elevations.

Selected Legislation

State

California Administrative Code, Title 20, Section 1604 (efficiency standards)

Water Conservation in Landscaping Act, California Government Code, Division 1, Chapter 3, Article 10.8, Section 65591-65600. This Act calls for Department of Water Resources (DWR) to promote and prepare model ordinance. Provides for water efficient landscape ordinance to be adopted by local agencies.

M.2. WASTEWATER

INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Question

- XVI.a): Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- XVI.b): Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- XVI.c): Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- XVI.d): Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

B. Introduction

The City of Los Angeles operates wastewater treatment and reclamation facilities which serve most of its incorporated areas and several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The elements of the existing system are two treatment plants, two water reclamation plants, a collection system consisting of over 6,500 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. (See Exhibit M.2-1).

Wastewater service and planning areas are determined by natural drainage patterns and do not generally conform to City boundaries. Cities that have contractual rights to discharge specific quantities of wastewater into the City's system are Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando, Santa Monica, and Universal City. The City serves Marina Del Rey and the Naval Yard in San Pedro. In addition, County Sanitation Districts 4, 5, 9, 11, 16 and 27 serve parts or all of Hollywood, Inglewood, Windsor Hills, Baldwin Hills, Alhambra, Pasadena, and South Pasadena, which also have contractual rights to discharge specific quantities of wastewater into the City's system. The Los Angeles County Sanitation Districts serve the Harbor Gateway as well as several small "islands" north of Inglewood.

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The sanitary sewer system serving the City of Los Angeles and its contract agencies is operated under the jurisdiction of the Department of Public Works. The Bureau of Sanitation provides advance planning and financial management, and maintains and operates the wastewater collection and treatment system. The Bureau of Engineering provides design and construction engineering. More detailed information on the City's wastewater collection and treatment system is included in 3. Data, Resources, and References.

Wastewater service requirements are related to the size and type of projects and geographic area served. New projects (e.g., residential, commercial, industrial) may increase wastewater generation and affect wastewater collection and treatment systems. The City's Wastewater Capital Improvement Program (CIP) includes planned improvements to the City's major sewers, pumping plants, and treatment/reclamation plants which are intended to provide capacity in the larger components for planned patterns of development. City Ordinance No. 166,060 (Sewer Allocation) limits the annual increase in wastewater flows discharged into the Hyperion Treatment System to 5 million gallons per day (mgd).

C. Screening Criteria

- Would the project produce wastewater flows greater than existing flows in an area shaded on Exhibits M.2-2 through M.2-11
- Would the project produce a new or increased average daily wastewater flow of 4,000 gallons per day (gpd) or more, regardless of location?
- Does the proposed project include a change in land use limitations (such as a zone change, variance or General Plan amendment), which could allow greater average daily flows than could be produced following the current land use limitations?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Wastewater, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Wastewater impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project and project site and determine the wastewater generation that would be expected with full implementation of the project. If the proposed project would generate wastewater flows larger than existing flows, locate the project and appropriate point of connection to the wastewater collection system on the sewer capacity threshold study area maps, Exhibits M.2-2 through M.2-11, prepared by the Department of Public Works. If the project would change the land use limitations, compare the maximum average daily flows produced by the current land use and zoning designations with the amount that could be produced under the proposed project. The sewage generation factors contained in Exhibit M.2-12 may be used to calculate average daily wastewater flows for a variety of land uses. If needed, consult with the sewer permit counter staff (see 3. DATA, RESOURCES, AND REFERENCES).

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows at a point where, and a
 time when, a sewer's capacity is already constrained or that would cause a sewer's capacity
 to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Location of the proposed development and appropriate point of connection to the wastewater collection system on the pertinent Sewer Wye Map;

- Description of the existing wastewater system which would serve the project, including its capacity and current flows. Include plans for additions or expansions of the existing system, and the population projected for the planning subregion; and
- Summary of adopted wastewater-related plans and policies that are relevant to the project area.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site and existing wastewater infrastructure; evaluate the project's wastewater system needs. Pertinent information includes the size, type of use, and location of the proposed project, the point of connection to the wastewater collection system, and the anticipated average daily wastewater flow, taking into consideration design or operational features that would reduce or offset service impacts. If applicable, compare the maximum average daily flows anticipated with the proposed project to the maximum flows that could be produced under the existing land use designation and zoning.

Compare the project's wastewater system needs to the appropriate sewer's capacity and/or the wastewater flows anticipated in the Wastewater Facilities Plan or General Plan (including specific plans, Community Plans, etc.). A sewer's capacity is considered constrained if the depth of flow is equal to or greater than three-quarters of the sewer's diameter; "measurable" means any change greater than ½ inch (0.013 meters). Consult with the Department of Public Works sewer permit counter staff, if necessary, to gauge the anticipated capacity and demand conditions at project buildout and/or to prepare a sewer availability assessment.

Wastewater flow in gpd may be calculated by applying wastewater generation flow factors (see Exhibit M.2-12) for each of the land uses/facility types for the project. The flows for all applicable land uses may then be added in order to obtain total projected wastewater flow.

Example:

To calculate the wastewater flow from a mixed-use development with 20 one-bedroom condominiums, 20 two-bedroom condominiums, and 4,000 gross square feet (gsf) of general commercial/retail, use the wastewater generation flow factors from Exhibit M.2-12 as follows:

Residential Uses:

One bedroom condos: 20 x 120 gpd/unit 2,400 gpd Two bedroom condos: 20 x 160 gpd/unit 3,200 gpd

Commercial Uses:

Retail: 4,000 gsf x 80 gpd/1,000 gsf 320 gpd

TOTAL PROJECT: 5,920 gpd

Cumulative Impacts

Review the list of related projects. Identify those that would be served by the same wastewater facilities as the proposed project. In the same manner as for Project Impacts, evaluate the cumulative impact on wastewater infrastructure. To the extent known, consider design or operational features of the related projects that would reduce or offset service impacts typically expected. Identify any wastewater capital improvement projects that would reduce or offset the expected service impacts. Determine the combined effect of the proposed project and the related projects on the wastewater infrastructure.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Retrofit other buildings with low-flow plumbing fixtures to offset wastewater generation associated with the project;
- Install a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak periods;
- Include a grey water system to reuse wastewater from the project;
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and

- Construct new wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.

3. DATA, RESOURCES, AND REFERENCES

For the most recent data and information regarding wastewater treatment and conveyance, contact the Bureau of Sanitation, Wastewater Engineering Services Division.

Wastewater Engineering Services Division 2714 Media Center Los Angeles, CA 90065 Telephone: (323) 342-6256

Detailed information about the location, size and slope of existing sewers is available on line at http://navigatela.lacity.org/ and at the Bureau of Engineering's public counters:

Central District	201 North Figueroa Street, 3 rd Floor, Counter C
	Los Angeles, California. 90012
	Telephone: (213) 977-7030
Valley District.	6262 Van Nuys Boulevard, Suite 251
	Van Nuys, California 91401
	Telephone: (818) 374-5090
West Loas Angeles District	1828 Sawtelle Blvd., 3 rd Floor
	West Los Angeles, California 90025
	Telephone: (310) 575-8384
Harbor District	638 South Beacon Street, Suite 402
	San Pedro, California 90731
	Telephone: (310) 732-4677

Information about the land uses anticipated in the general plan is available on line at http://navigatela.lacity.org/ and at the City Planning Department's Community Planning Bureau public counters. See Chapter H for contact information.

Ordinance No. 166,060 (Sewer Allocation) limits the annual increase in the wastewater quantity discharged into the HTP system to five mgd. Bureau of Engineering Special Order No. SO06-0691 changed the design peak dry weather flow for sanitary sewers from three-quarter depth to one-half the sewer diameter to implement the City-adopted goal of no overflows or diversions

from the wastewater collection system. Since these two criteria impact the sewer capacity availability assessment and approval, they should be considered in the evaluation of project impacts. Engineering personnel at the sewer permit counters implement the ordinance.

City of Los Angeles, City Planning Department. General Plan Framework Element, 1996 readopted, August 8, 2001.

The current Wastewater Facilities Plan, which addresses the City's wastewater treatment and collection needs over a 2010 planning horizon, was adopted by the City Council on January 22, 1991. The Plan is currently being revised through an integrated resource planning effort to address demand and capacity through 2020 with new construction and expansion of facilities and operations; water reclamation; and conservation. (Integrated Plan for the Wastewater Program.)

Bureau of Engineering, Wastewater Program Management Division. Wastewater Capital Improvement Program Management Plan. Part D. General Procedural Memorandum No. 16. Sewer Availability Assessment for Proposed Developments.

Wastewater Facilities Background Information

Hyperion Treatment Plant

The Hyperion Treatment Plant (HTP) is located on a 144-acre (58.3 ha) site adjacent to Santa Monica Bay, southwest of the Los Angeles International (LAX) Airport. The drainage area served by the plant is approximately 328,000 acres (133,000 ha) of the greater metropolitan area. The largest wastewater treatment facility in the City, HTP provides full secondary treatment for an average dry weather flow of 413 mgd (1.56 million m³/d). Solids handling facilities are provided fro 468 dry tons per day.

A small portion of the HTP's effluent is reused, principally for recharging barrier wells, but most of the effluent is discharged into Santa Monica Bay. The five-mile outfall consists of a 12-foot (3.66m) diameter reinforced concrete pipe, a wye structure, and two diffuser legs that discharge primary and secondary treated effluent at a depth of 187 feet (57 m). The city also maintains a one-mile outfall, which is a 12-foot (3.66m) diameter reinforced concrete pipeline terminating at a depth of 50 feet (15.2), in standby condition in case of emergency.

Raw sludge removed from the primary sedimentation system and excess waste activated sludge from the activated sludge system, are pumped into anaerobic sludge digesters for stabilization. The resulting biosolids are either reused in agriculture, or used by landfills as daily cover. No biosolids are discharged into the ocean.

The HTP receives sewage from five major interceptor sewer systems:

- Central Outfall Sewer (COS), serving South Central Los Angeles, El Segundo, and portions of Culver City;
- North Central Outfall Sewer-North Outfall Sewer (NCOS-NOS), serving the southern portions of the cities of Burbank and Glendale, eastern portions of the San Fernando Valley, sections of eastern, central, and south-central Los Angeles, and portions of Culver City;
- North Outfall Sewer-La Cienega, San Fernando Valley Relief (NOS-LCSFVRS), serving the central, northeastern, and western areas of the San Fernando Valley, the western portion of the City, and Beverly Hills, Hollywood, and Playa Del Rey;
- Coastal Interceptor Sewer System (CIS), serving Pacific Palisades, Venice, Mar Vista, the City of Santa Monica and adjacent areas of Los Angeles County; and
- North Outfall Replacement Sewer (NORS), designed to take the pressure off of the North Outfall Sewer.

Within the HTP Service Area, the City operates and maintains pumping plants at those locations where, because of inadequate hydraulic head, sewage flow must be pumped in order to reach the approximate treatment facility. These pumping plants vary in size from capacities of about 30 to 100 gallons per minute (gpm) (114-379 l/min) to capacities of up to 35,000 gpm (132,000 l/min).

Tillman Water Reclamation Plant

The Donald C. Tillman Water Reclamation Plant (TWRP) is located in the West San Fernando Valley at the intersection of Victory Boulevard and Woodley Avenue on the edge of the Sepulveda Flood Control Basin. TWRP has a current design capacity of 80 mgd (0.302 million m³/d).

The TWRP is an upstream plant that treats constant flows, since it has the ability to bypass flow to the HTP for treatment. The TWRP receives its influent wastewater from the Additional Valley

Outfall Relief Sewer (AVORS) as well as the East Valley Interceptor Sewer (LCSFVRS) tunnel and the downstream system. This hydraulic relief eliminates dry weather overflows from the North Outfall Treatment Facility (NOTG) into Ballona Creek in Culver City.

The tertiary effluent from TWRP is used by the City for irrigating nearby parks, golf courses, greenbelt areas, and for filling the manmade Balboa Lake, or is discharged to the Los Angeles River. All waste solids are returned to AVORS for transport to HTP.

Los Angeles-Glendale Water Reclamation Plant

The Los Angeles-Glendale Water Reclamation Plant (LAGWRP) is located at the southwest junction of the Los Angeles River Flood Control Channel and Colorado Boulevard between Griffith Park and Glendale.

The LAGWRP is a full tertiary treatment facility with capacity to provide tertiary treatment for an average dry weather flow of 20 mgd (0.76 million m³/d). The plant receives its influent wastewater from the North Outfall Sewer (NOS), thus providing hydraulic relief for the downstream interceptor conveyance facilities and the HTP, while producing recycled water. The plant effluent is pumped to the recycled water distribution system or flows by gravity to the Los Angeles River. All Solids removed from the treatment process are returned untreated to the North Outfall Sewer for conveyance to and treatment at the Hyperion Treatment Plant.

There are two other wastewater treatment facilities in the LAGWRP service area: the Burbank Water Reclamation Plant and the Los Angeles Zoo Treatment Facility.

The Burbank Water Reclamation Plant located in and owned and operated by the City of Burbank. It treats an average flow of 8.5 mgd and its effluent is used for industrial purposes or discharged to the Burbank Western Flood control Channel, a tributary channel to the Los Angeles River. Solids from the Burbank Water Reclamation Plant are conveyed to and treated at the Hyperion Treatment Plant.

The Los Angeles Zoo Treatment Facility is adjacent to the west side of the Golden State Freeway just south of the Ventura Freeway. It provides primary treatment, chlorination and dechlorination of 2.5 mgd of runoff and wash-down water from animal enclosures. The effluent is discharged to the Los Angeles River and the solids are discharged to the North Outfall Sever for conveyance to and treatment at the Hyperion Treatment Plant.

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Terminal Island Treatment Plant

The Terminal Island Treatment Plant (TITP) is located on Terminal Island in the Los Angeles Harbor area and covers approximately 20 acres (8 ha). The existing facility provides tertiary treatment for an average dry weather flow of 30 mgd (0.114 million m³/d). In addition to tertiary treatment, advanced treatment (microfiltration with reverse osmosis) can be provided for 5 mgd. The tertiary effluent flows to the Los Angeles Outer Harbor to a point approximately 3,000 feet (914) m) off-shore via a 60-inch (1,520 mm) diameter outfall. Advanced treated water is used for recharging barrier wells, landscape irrigation, boiler water and cooling water. Solids from the TITP (up to about 19 dry tons per day) are thickened, anaerobically digested, dewatered and hauled to Kern, San Diego, Los Angeles, and Riverside Counties for land application and reuse as a soil amendment.

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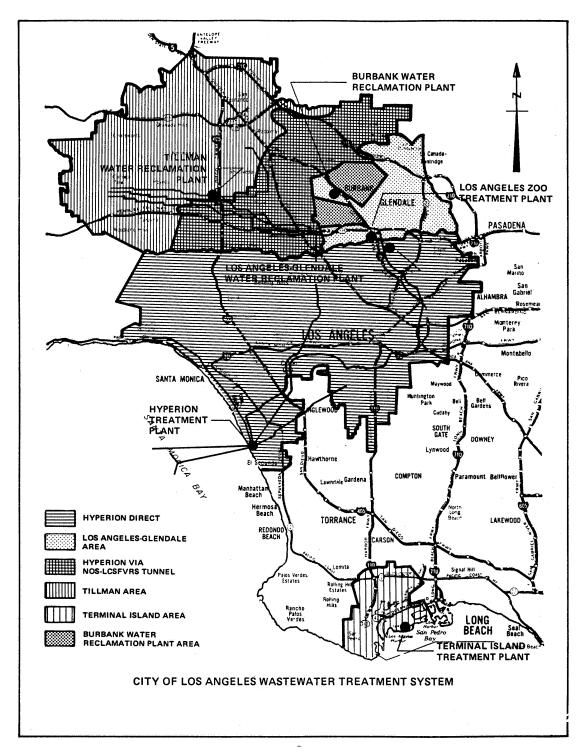


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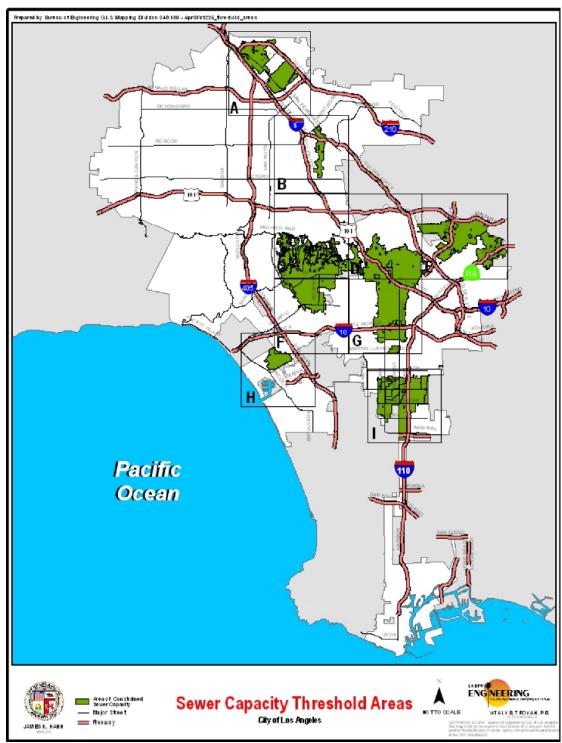


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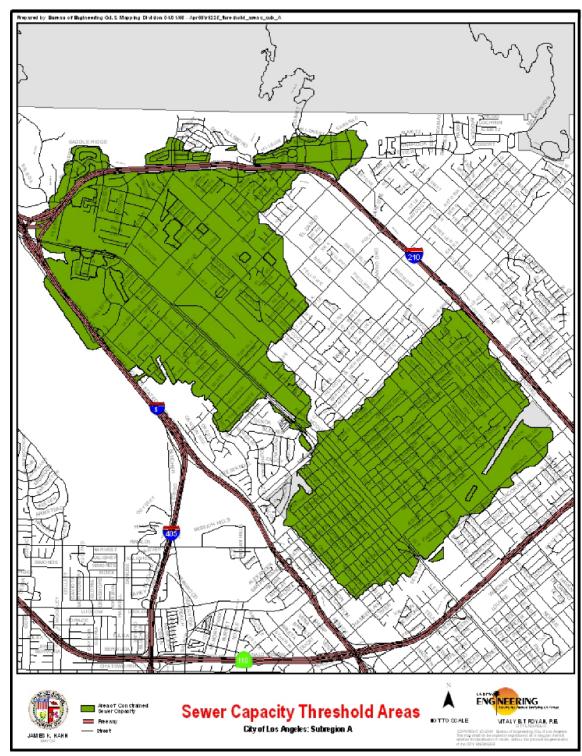


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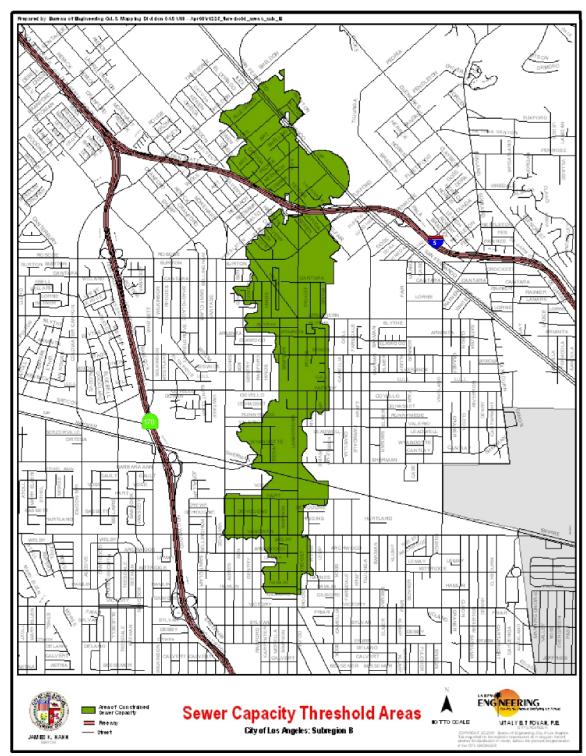


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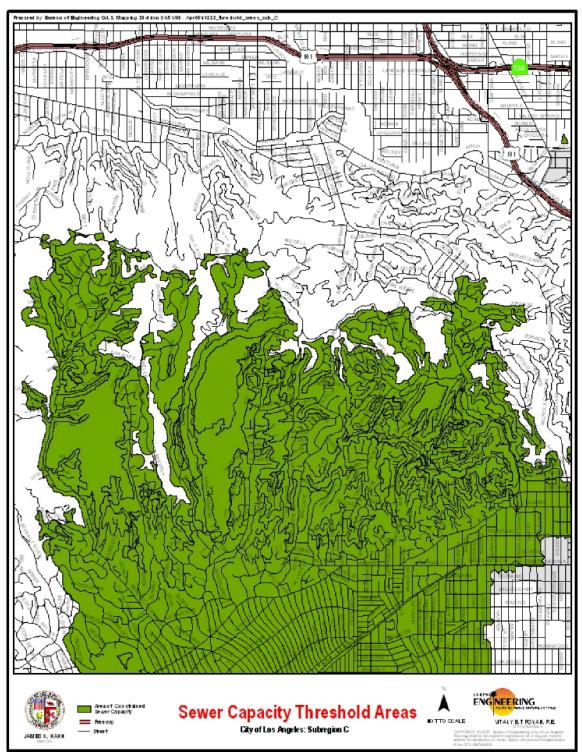


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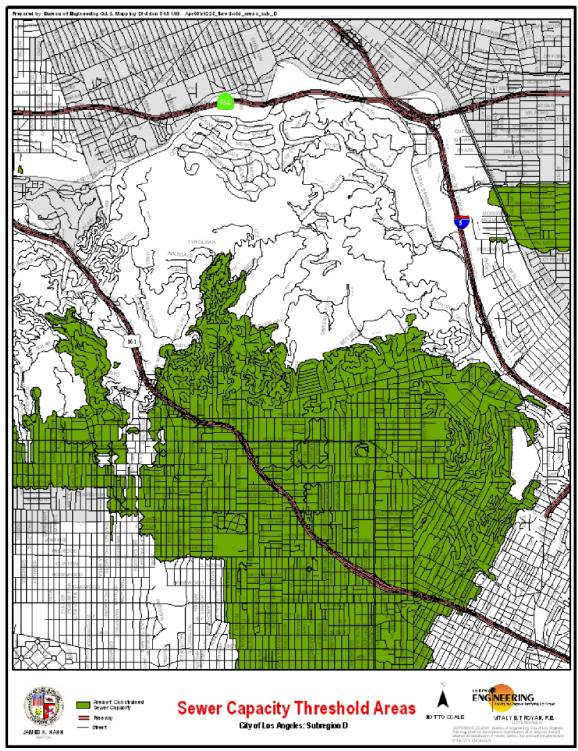


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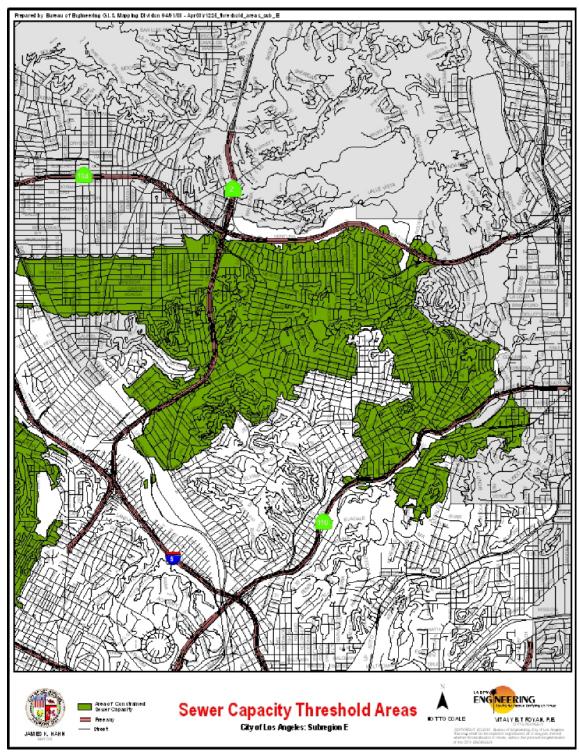


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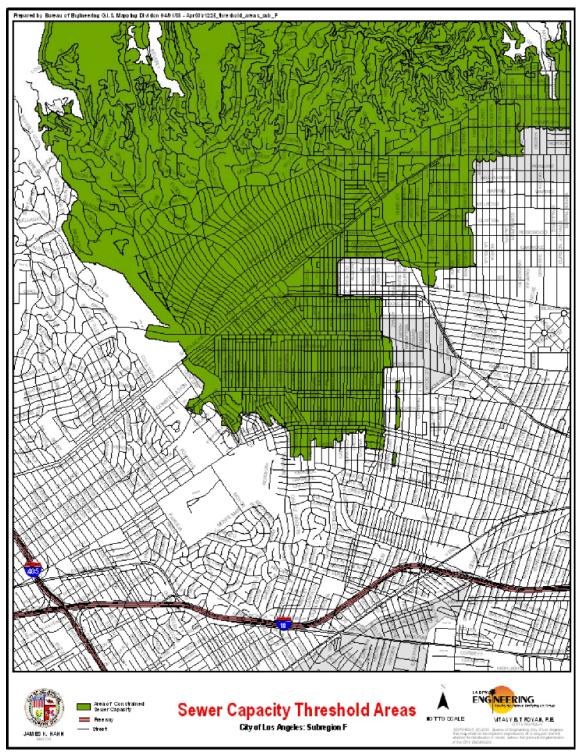


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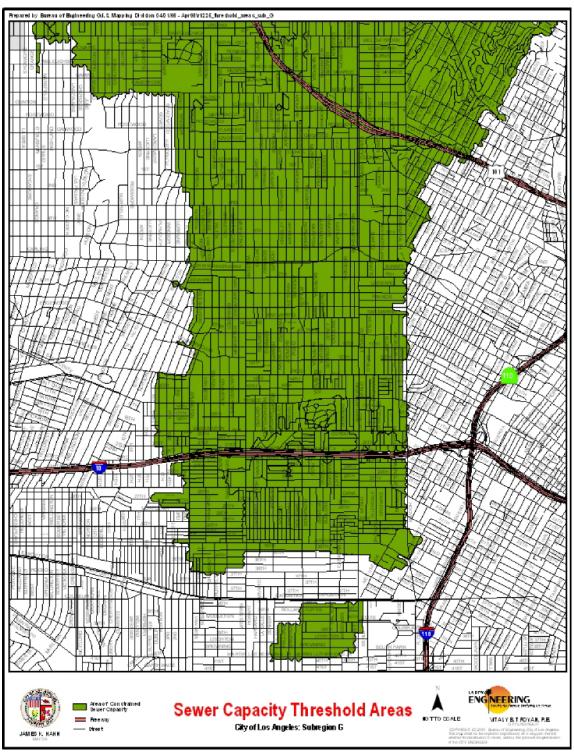


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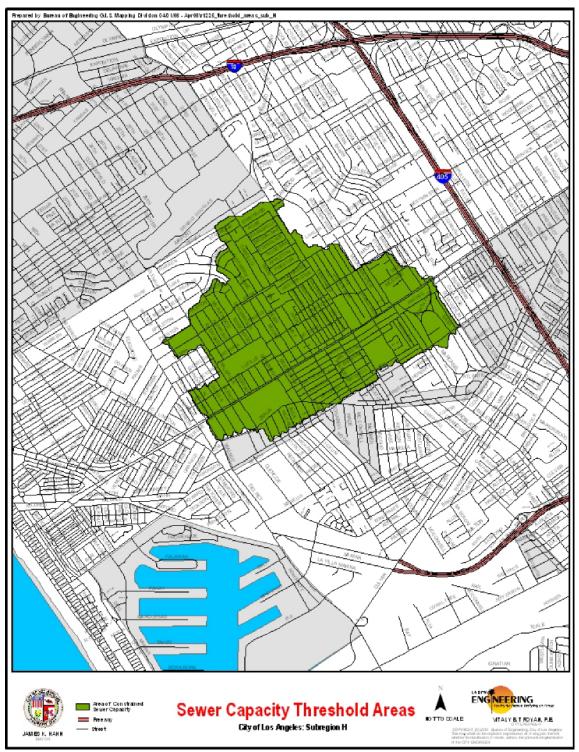


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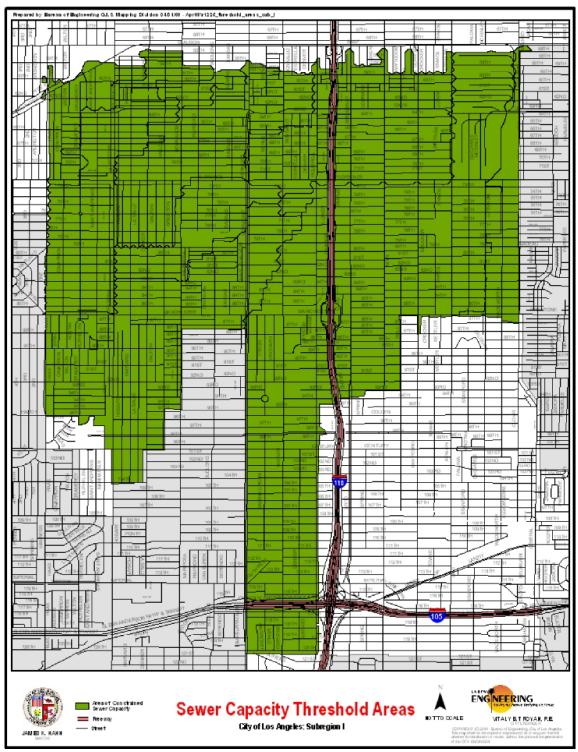


Exhibit M. 2-11

Exhibit M.2-12 SEWAGE GENERATION FACTORS

Type Description	Average Daily Flow (Gpd/unit)
Acupuncture Office/Clinic	150/1000 Gr.sq.ft.
Arcade - Video Games	80/1000 Gr.sq.ft.
Auditorium	4/seat
Auto Parking	20/1000 Gr.sq.ft.
Auto Body/Mech Repair Shop	800/1000 Gr.sq.ft. + Process Flow
Bakery	280/1000 Gr.sq.ft.
Bank: Headquarters	150/1000 Gr.sq.ft.
Bank: Branch	80/1000 Gr.sq.ft.
Banquet Room/ Ballroom	800/1000 Gr.sq.ft.
Bar: Cocktail, Fixed Seat	18/seat
Bar: Juice (No Baking Facilities)	120/1000 Gr.sq.ft.
Bar: Juice (With Baking Facilities)	280/1000 Gr.sq.ft.
Bar: Cocktail Public Table Area	500/1000 Gr.sq.ft.
Barber Shop	100/1000 Gr.sq.ft.
Beauty Parlor	280/1000 Gr.sq.ft.
Building Construction Field Office	150/office
Bowling Alley: Alley, Lanes & Lobby Area	80/1000 Gr.sq.ft.
Bowling Facility: Arcade/ Bar/ Restaurant/ Dancing	See Individual Categories
Cafeteria: Fixed Seat	30/seat
Car Wash: Automatic	Process Flow
Car Wash: Coin Operated Bays	Process Flow
Car Wash: Hand Wash	Process Flow
Car Wash: Counter & Sale Area	80/1000 Gr.sq.ft
Chapel: Fixed Seat	4/seat
Chiropractic Office	150/1000 Gr.sq.ft.
Church: Fixed Seat	4/seat
Church School: Day Care/elem	8/occupant
Church School: One Day Use/week	200/1000 Gr.sq.ft.
Cocktail Lounge: Fixed Seat	18/seat
Coffee House: No Pastry Baking & No Food Prep.	120/1000 Gr.sq.ft.
Coffee House: Pastry Baking Only	280/1000 Gr.sq.ft.
Coffee House: Serves Prepared Food	30/seat
Cold Storage: No Sales	20/1000 Gr.sq.ft.
Cold Storage: Retail Sales	80/1000 Gr.sq.ft.
Comfort Station: Public	100/fixture
Commercial Use	80/1000 Gr.sq.ft.
Community Center	4/occupant
Conference Room of Office Bldg.	Same as other areas in an office bldg.
Counseling Center ¹	150/1000 Gr.sq.ft.
Credit Union	150/1000 Gr.sq.ft.
Dairy	Process Flow
Dairy: Barn	Process Flow
Dairy: Retail Area	80/1000 Gr.sq.ft.

Counseling center include marriage counseling centers, alcohol/drug rehabilitation/dependency centers, nutrition center, diet centers, etc.

Exhibit M.2-12, continued SEWAGE GENERATION FACTORS

Type Description	Average Daily Flow (Gpd/unit)
Dancing Area of Bar or Nightclub	600/1000 Gr.sq.ft.
Dance Studio	80/1000 Gr.sq.ft.
Dental Office/Clinic	250/1000 Gr.sq.ft.
Doughnut Shop	280/1000 Gr.sq.ft.
Drug Rehabilitation Center	150/1000 Gr.sq.ft.
Equipment Booth	20/1000 Gr.sq.ft.
Film Processing – 1-Hour Photo, etc.	100/1000 Gr.sq.ft.
Film Processing – Industrial	80/1000 Gr.sq.ft. + Process Flow
Food Processing Plant	80/1000 Gr.sq.ft. + Process Flow
Gas Station: Self Service	100/w.c.
Gas Station: Four Bays Maximum	430/station
Golf Course: 18-hole/ 9-hole Green Area	0
Golf Course: Driving Range	0
Golf Course Facility: Lobby/Office/Restaurant/Bar	See Individual Categories
Gymnasium – Basketball, Volleyball	250/1000 Gr.sq.ft.
Hanger (Aircraft)	80/1000 Gr.sq.ft.
Health Club/ Spa ²	800/1000 Gr.sq.ft.
Homeless Shelter	75/bed
Hospital	75/bed
Hospital: Convalescent	75/bed
Hospital: Animal	280/1000 Gr.sq.ft.
Hospital: Psychiatric	75/bed
Hospital: Surgical	450/bed
Hotel: Use Guest Rooms Only	130/room
Jail	85/inmate
Kennel: Dog Kennel/Open Run	100/1000 Gr.sq.ft.
Laboratory: Commercial	250/1000 Gr.sq.ft.
Laboratory: Industrial	Process Flow
Laundromat	170/machine
Library: Public Area	80/1000 Gr.sq.ft.
Library: Stacks, Storage	25/1000 Gr.sq.ft.
Lobby of Retail Area ³	80/1000 Gr.sq.ft.
Lodge Hall	4/seat
Lounge	See Lobby of Retail Area
Machine Shop	80/1000 Gr.sq.ft. + Process Flow
Manufact or Indust Facility	80/1000 Gr.sq.ft. + Process Flow
Massage Parlor	275/1000 Gr.sq.ft.
Medical Building	250/1000 Gr.sq.ft.
Medical Lab in Hospital	250/1000 Gr.sq.ft.

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Lobby of retail includes lounges, holding rooms, waiting areas, etc.

Health club/spa includes lobby area, workout floors, aerobic rooms, swimming pools, Jacuzzi, sauna, locker rooms, showers, and restrooms. If a health club/spa has a gymnasium facility, use the gymnasium rate for that portion. Gymnasiums include basketball courts, volleyball courts, and any other large open space with low occupancy density.

Exhibit M.2-12, continued SEWAGE GENERATION FACTORS

Type Description	Average Daily Flow (Gpd/unit)
Medical Office/ Clinic	250/1000 Gr.sq.ft.
Mini-mall	80/1000 Gr.sq.ft.
Mortuary: Embalming	5/7 Gr.sq.ft.
Mortuary: Chapel	4/seat
Mortuary: Living Area	80/1000 Gr.sq.ft.
Motel: Use Guest Rooms Only	130/room
Museum: All Areas	20/1000 Gr.sq.ft.
Museum: Office over 15%	150/1000 Gr.sq.ft.
Museum: Sales Area	80/1000 Gr.sq.ft.
Office Building	150/1000 Gr.sq.ft.
Office Building with Cooling Tower	180/1000 Gr.sq.ft.
Plating Plant	80/1000 Gr.sq.ft. + Process Flow
Pool Hall (No Alcohol)	80/1000 Gr.sq.ft.
Post Office: Full Service ⁴	150/1000 Gr.sq.ft.
Prisons	175/inmate
Residential Dorm: College or Residential	75/student
Residential: AptBachelor/single	80/dwelling Unit
Residential: Apt 1 Bedroom	120/dwelling Unit
Residential: Apt 2 Bedroom	160/dwelling Unit
Residential: Apt 3 Bedroom	200/dwelling Unit
Residential: Apt >3 Bedroom	40/additional bedroom
Residential: Boarding House	75/bed
Residential: Condo - 1 Bedroom	120/dwelling Unit
Residential: Condo - 2 Bedroom	160/dwelling Unit
Residential: Condo - 3 Bedroom	200/dwelling Unit
Residential: Condo - >3 Bedroom	40/additional bedroom
Residential: Duplex/ Townhouse/ SFD - 1 Bd.	130/dwelling Unit
Residential: Duplex/ Townhouse/ SFD - 2 Bd.	180/dwelling Unit
Residential: Duplex/ Townhouse/ SFD - 3 Bd.	230/dwelling Unit
Residential: Duplex/ Townhouse/ SFD - >3 Bd	50/additional bedroom
Residential: Room Addition – Bedroom	50/additional bedroom
Residential: Room Addition Other Than Bedroom	0
Residential: Room Conversion into Bedroom	50/additional bedroom
Residential: Room Conversion into Other Than Bedroom	0
Residential: Mobile Home	160/dwelling Unit
Residential: Artist 2/3 of Area	250/dwelling Unit
Residential: Artist Residence	80/dwelling Unit
Residential: Guest Home With Kitchen	See Residential: Apartment
Residential: Guest Home without Kitchen	50/bedroom
Rest Home	75/bed
Restaurant: Drive-in	40/stall
Restaurant: Drive-in	20/seat

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⁴ Full service post offices include U.S. Postal Service, UPS, Federal Express, and other private express mail services.

Exhibit M.2-12, continued SEWAGE GENERATION FACTORS

Type Description	Average Daily Flow (Gpd/unit)
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Restaurant: Fast Food - Indoor Seat	20/seat
Restaurant: Fast Food - Outdoor Seat	12/seat
Restaurant: Full Service - Indoor Seat	30/seat
Restaurant: Full Service - Outdoor Seat	18/seat
Restaurant: Take-out	300/1000 Gr.sq.ft.
Retail Area	80/1000 Gr.sq.ft.
Rifle Range: Shooting Stalls, Shooting Lanes, Lobby	80/1000 Gr.sq.ft.
Rifle Range Facility: Bar, Restaurant	See Individual Categories
School: Arts/Dancing/Music (Part Time)	80/1000 Gr.sq.ft.
School: Arts/Dancing/Music (Full Time)	See type of school below
School: Day Care Center	8/child
School: Elementary or Junior High ⁵	8/student
School: High School ⁵	12/student
School: Kindergarten	200/1000 Gr.sq.ft.
School: Martial Arts (Part Time)	80/1000 Gr.sq.ft.
School: Martial Arts (Full Time) ⁵	See type of school below
School: Nursery - Day Care	8/child
School: Special Class	8/student
School: Trade or Vocational ⁵	12/student
School: Training ⁵	12/student
School: University or College ⁵	18/student
School: Dormitory ⁶	75/student
School: Stadium, Pavilion	4/seat
Spa/ Jacuzzi: Commercial - with backwash	Process Flow
Spa/ Jacuzzi: Residential, replaceable filter crtrdg	0
Storage: Building/Warehouse	20/1000 Gr.sq.ft.
Storage: Self Storage Bldg.	20/1000 Gr.sq.ft.
Store: Ice Cream/Yogurt	80/1000 Gr.sq.ft.
Store: Retail	80/1000 Gr.sq.ft.
Studio: Film/ TV – Audience Viewing Room	4/seat
Studio: Film/ TV – Regular Use Indoor Filming Area	80/1000 Gr.sq.ft.
Studio: Film/ TV – Indust. Use Film Proc, Machine Shop	80/1000 Gr.sq.ft. + Process Flow
Studio: Recording	80/1000 Gr.sq.ft.
Swimming Pool: Commercial with backwash	Process Flow
Swimming Pool: Residential replaceable filter crtrdg	0
Tanning Salon: Independent, No Shower	80/1000 Gr.sq.ft.
Tanning Salon: Within a Health Spa/Club	800/1000 Gr.sq.ft.

The sewage generation factor for schools based on student capacity covers the following facilities: classrooms and lecture halls, professors' offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses and storage areas, auditoriums and gymnasiums. For any facility not listed under "schools" (e.g., stadium), see the generation factor listed for that land use type.

The sewage generation factor for a college dormitory based on student capacity also includes the sewage generation factor for the dormitory cafeterias.

Exhibit M.2-12, continued SEWAGE GENERATION FACTORS

Type Description	Average Daily Flow (Gpd/unit)
Theatre: Drive-in	10/vehicle
Theatre: Live/Music/Opera	4/seat
Theatre: Cinema	4/seat
Tract: Commercial/ residential	1/acre
Trailer: Construction/Field Office	150/office
Veterinary Clinic/Office	280/1000 Gr.sq.ft.
Warehouse	20/1000 Gr.sq.ft.
Warehouse with Office	Use Factor for Each Separate Category
Waste Dump: Recreational	430/station
Wine Tasting Room: Kitchen	215/1000 Gr.sq.ft.
Wine Tasting Room: All Areas	80/1000 Gr.sq.ft.

Notes:

<u>Gpd/unit</u> = Gallons per day (gpd) per unit as indicated.

<u>Gr.sq.ft.</u> = Gross Square Feet: area included within the exterior or the surrounding walls of a building excluding courts.

 $\underline{\text{GPM Peak}}$ = Peak Flow in gallons per minute. There is an assumption that the peak to average flow ratio is 3.5. Therefore, 1.0 gpm x 1440 minutes/day divided by 3.5 = 412 gpd which is the unit flow factor in the table.

See next page for metric equivalents.

Source: Bureau of Sanitation. Sewerage Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996.

METRIC CONVERSION

The President's Executive Order 12770, Metric Usage in Federal Government Programs, was signed on July 25, 1991. Federal regulations recently enacted require that all government affairs be conducted in metrics. The City of Los Angeles must comply with the resultant federal regulations in order to obtain federal funding and permit approvals. For example, federally funded street improvement projects must be designed, advertised and contracted in metric units.

In response to the federal government's actions, the City Engineer has issued a Metric Conversion Manual and a Special Order for metric conversion within the Bureau of Engineering intended to keep the Bureau current with the situation and allow time to analyze the full impact of the conversion while protecting potential federal funding. Review of private development standards and requirements is currently under way and will be the subject of a separate Special Order. That study will determine whether land developers should submit documents and plans in metrics or if they may continue to use Imperial units. Meanwhile, the following is intended for use only with Table 1 and the foregoing thresholds.

	EQUIVALENT	gpd/1000 Gr.sq.ft.		EQUIVALENT	gpd/1000 Gr.sq.ft.
GALLONS	LITERS	converted to	GALLONS	LITERS	converted to
	(1 qt = .9463 l)	I per day / 100 m2		(1 qt = .9463 l)	l per day / 100 m2
800	3,028	3,260	130	492	530
600	2,271	2,445	120	454	489
500	1,893	2,037	100	379	407
450	1,703	1,834	85	322	346
430	1,628	1,752	80	303	326
412	1,560	1,679	75	284	306
300	1,136	1,222	50	189	204
280	1,060	1,141	40	151	163
275	1,041	1,120	30	114	122
250	946	1,019	25	95	102
230	871	937	20	76	81
215	814	876	18	68	73
200	757	815	12	45	49
180	681	733	10	38	41
175	662	713	8	30	33
170	643	693	5	19	20
160	606	652	4	15	16
150	568	611	1	4	4

1 gpd/acre = 9 liters per day per hectare

M.3. SOLID WASTE

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

- XVI.f): Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- XVI.g): Would the project comply with federal, state, and local statutes and regulations related to solid waste?

B. Introduction

The management of solid waste in the City of Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The Bureau of Sanitation provides collection services primarily to single family residences and some of the smaller multi-family residences. The City is also responsible for collecting waste from the City Hall complex, some public buildings, parks and fire stations. Multifamily residences, such as apartment complexes and condominiums, and commercial and industrial buildings, contract with a private company to collect and transport their materials for disposal or recycling.

The solid waste management hierarchy encompasses the system of solid waste source reduction, composting, transformation and disposal. The demolition, construction, and operation of projects results in the generation of solid waste. Project impacts are related to: the amount of waste generated and diverted; the need for additional solid waste collection routes or disposal facilities; and compliance with adopted policies and objectives.

In September 1989, the California Integrated Solid Waste Management (ISWM) Act (also known as AB 939) was passed. It required each city in the state to divert at least 25 percent of its solid waste from landfill disposal through source reduction, recycling, and composting, by the end of 1995. Cities must now divert at least 50 percent of their waste stream. AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare annually a Source Reduction and Recycling Element (SRRE) to describe how it will reach its goals.

The City of Los Angeles has also prepared a Solid Waste Management Policy Plan

L.A. CEOA Thresholds Guide City of Los Angeles 2006 Page M.3-1 (CiSWMPP), which was adopted by the City Council in November 1994. The CiSWMPP is a longterm planning document containing goals, objectives and policies for solid waste management for the City. It specifies citywide diversion goals and disposal capacity needs.

C. Screening Criteria

Would implementation of the proposed project result in solid waste generation of five tons or more per week?

A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Solid Waste, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to the preceding question indicates that there would normally be no significant impact on Solid Waste from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project. Estimate typical project waste generation. The following solid waste generation factors may be used*:

Residential 12.23 pounds per household per day Commercial 10.53 pounds per employee per day Industrial 8.93 pounds per employee per day

These factors are estimates prior to recycling, composting or other waste diversion programs. Factors do not include generation of construction debris.

Compare this information to the Screening Criteria.

2. **DETERMINATION OF SIGNIFICANCE**

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

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- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.¹

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include a description of the solid waste collection services (both diversion and disposal), and facilities which would serve the project. Include the name, location, and other relevant characteristics of the services or facilities, such as the remaining capacity of nearby landfills, daily capacity at recycling centers, the availability of disposal and recycling services, the materials accepted, etc.

Project Impacts

Based on the proposed land uses and their sizes, calculate the amount of anticipated solid waste that would result from implementation of the proposed project. Include both demolition and construction waste and waste generated by project operations. Identify any design measures, such as recycling programs and other waste diversion features, that would reduce the amount typically expected. Consider whether the project's waste would require the addition of a new solid waste collection route or other major improvements.

Compare the project's anticipated waste generation with the land use-specific waste diversion goals in the SRRE, if applicable, and with the overall waste reduction goals in the

City of Los Angeles

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Waste diversion goals have been identified for a limited number of targeted waste generators and materials. Future updates of the SRRE may expand the land uses and materials covered, or modify the current waste diversion goals.

CiSWMPP, the Framework Element, and Curbside Recycling Program. Note whether the project would support the City's waste reduction goals and/or whether the project would meet specific waste diversion targets, if applicable. A project need not guarantee that it would meet the land use specific waste diversion goals in the SRRE; however, project proponents should identify measures to incorporate into the project to work toward meeting the goals.

Cumulative Impacts

Review the description of the related projects. Identify those that affect the same solid waste collection, disposal, and recycling facilities as the proposed project. Determine the amount of waste generation and diversion from these related projects and then consider the combined impact of the proposed related projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Incorporate recycled content materials in building products, furnishings and building maintenance;
- Recycle construction and demolition debris and California Redemption Value (CRV) generated during construction;
- Use mulching, composting, and grass-cycling on landscaped areas. Use xeriscaping or other low maintenance methods in landscape design;
- Develop a project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects and certain expansions;
- Incorporate a statement or brochure instructing occupants about source reduction, recycling and procurement of recycled content materials into the ownership agreement, property management agreements and tenant agreements;
- Institute an employee participation recycling program whereby employees are given individual containers/bins to separate newspaper, white and/or colored paper for

regular collection by recyclers;

- Educate residents about proper household hazardous waste collection programs;
- Institute employee education which would, through a series of brief educational sessions, outline various methods whereby employees can further contribute to methods of recycling/conservation in the office and home (e.g., contracting with firms for the purchase of recycled paper, use of two-sided reports, replacement of styrofoam cups with coffee mugs); and
- Conduct an annual waste audit review to measure the effectiveness of the tenant education program and recycling collection activities. Use the results to improve the project recycling plan. Include:
 - A review of purchasing patterns to eliminate materials not compatible with the established waste diversion program;
 - A review of operating procedures which generate either large amounts of waste or non-recyclable materials;
 - A review of occupancy uses and activities;
 - The evaluation and expansion of recyclable materials to be included in a recycling program; and
 - A review of employee awareness of recycling program goals, procedures, and accomplishments, as well as evaluations and implementation of training for all project occupants.

3. DATA, RESOURCES, AND REFERENCES

The Bureau of Sanitation provides information regarding citywide generation, disposal and diversion rates, disposal facilities, commercial, industrial, and residential programs, and collection contracts and agencies. Solid Resources Citywide Recycling Division is located at 433 S. Spring Street, Suite 500, Los Angeles, California 90013; Telephone: (213) 473-8228. For information on commercial, industrial, institutional, and multi-family diversion programs and resources, contact the Integrated Waste Management Office at 433 S. Spring Street, 5th Floor, Los Angeles, California 90013; Telephone: (213) 473-8150.

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- ISWM Act of 1989 (Public Resources Code 40050 et. seq.) requires specific waste diversion rates in cities and counties by the target years of 1995 (at least 25 percent) and 2000 (at least 50 percent) and mandates, through the California Integrated Waste Management Board (CIWMB) preparation of the SRRE.
- CiSWMPP is a long-term planning document containing goals, objectives and policies for solid waste management and specifies citywide diversion goals and disposal capacity at 62 percent by the year 2005.
- SRRE contains programs and policies for fulfillment of the goals of the ISWM Act and is updated annually. An executive summary of the 1995 annual update is available from the IWMO free of charge.
- The Space Allocation Ordinance (No. 171687) was adopted by the City Council on August 6, 1997, and includes requirements for recycling centers and facilities as well as for areas for collecting and loading recyclable materials. All new construction development projects, multiple family residential development projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more shall provide an adequate Recycling Area or Room for collecting and loading recyclable materials. The ordinance specifies the size, location, conditions of operations, and restrictions on Recycling Areas or Rooms. See Subdivision 19 of Section A of Section 12.21 of the LAMC. Additional information is available from the IWMO.

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M.4. ENERGY

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

VIII.a): Would the project conflict with adopted energy conservation plans?

VIII.b): Would the project use non-renewable resources in a wasteful and inefficient

manner?

XII.a): Would the proposal result in a need for new systems, or substantial alterations to

power or natural gas?

B. Introduction

Within the City of Los Angeles, electricity is provided by the Los Angeles Department of Water and Power (LADWP), and natural gas is provided by the Southern California Gas Company (The Gas Company). Energy service requirements are related to the size and type of projects, and the geographic area served. New projects (e.g., residential, commercial, industrial) may increase energy consumption and affect the energy distribution infrastructure.

Customers in the City consume electricity at a rate of approximately 22 million megawatt hours per year. Of LADWP's nearly 1.4 million customers, the largest number of customers are residential. Business and industry customers, however, consume about 70 percent of the electricity. A portion of the electrical consumption is also dedicated to street lighting and water supply distribution.¹ Additional background on electric infrastructure is found in 3. Data, Resources, and References.

The Gas Company serves about 19 million people in more than 530 cities in Southern and Central California, throughout 23,000 square miles. Of the approximately 5.4 million customers, nearly 4.5 million are residential. The average natural gas consumption for residential uses is 50

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LADWP, Statistics, Fiscal Year 1993-94. LADWP, 2003.

therms per year.² The Gas Company has about 48,000 miles of gas mains, of which 44,000 miles are for distribution and 3,319 miles are for transmission and/or storage.

Title 24 of the California Code of Regulations establishes energy conservation standards for new construction. These standards relate to insulation requirements, glazing, lighting, shading, and water and space heating systems. Also, the California Subdivision Map Act requires that new subdivision designs provide for future passive or natural heating and cooling opportunities, to the maximum extent feasible. The Los Angeles Municipal Code (LAMC) incorporates these state requirements.

C. Screening Criteria

- Would the project design or operation conflict with adopted energy conservation plans or policies of the City, or exceed the growth anticipated in the applicable Community Plan?
- Would the project, result in the need for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Energy, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant impact on Energy from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and energy distribution infrastructure. Determine the energy supply and distribution systems required to serve the project. New off-site energy supply facilities or capacity enhancing alterations to existing facilities include installation, replacement of, or upgrades to, power plants, receiving stations, distribution stations, natural gas mains, or storage or connecting systems. If necessary, consult with the LADWP or The Gas Company.

The Gas Company, Fact Sheet, Spring 1993, and telephone communication, Mr. Don Dockray, The Gas Company, June 17, 1994 and interview, 2004.

Also, consider conflicts with the energy conservation and infrastructure programs and policies of applicable utility plans, specific plans, the General Plan and its elements, or the Community Plan.

To evaluate the potential increase in growth, and the corresponding demand for energy from a proposed General Plan amendment, compare the projected population of the applicable planning subregion before and after the General Plan amendment. The Framework Element identifies future population goals for the City. If assistance in determining population projections for a planning subregion is needed, contact the City Planning Department, Community Planning Bureau.

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the electricity and natural gas supply and distribution infrastructure serving the project site. Include plans for new transmission facilities or expansion of existing facilities; and
- Summary of adopted energy conservation plans and policies relevant to the project.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site and the existing energy distribution infrastructure, evaluate the new energy supply and distribution systems which the project would require. Describe the energy conservation features that would be incorporated into project design and/or operation that go beyond City requirements, or that would reduce the energy demand typically expected for the type of project proposed. Consult with the DWP or The Gas Company, if necessary to gauge the anticipated supply and demand conditions at project buildout.

If project demand would require new infrastructure, determine whether the infrastructure was anticipated by adopted plans, such as applicable utility plans, specific plans, the General Plan and its elements, or the Community Plan. If the new energy supply or distribution system was anticipated at a later time by adopted plans, consider the impact of accelerating additions or alterations.

Cumulative Impacts

Review the list of related projects. Identify those that would be served by the same energy distribution infrastructure as the proposed project. In the same manner as for Project Impacts, evaluate the cumulative impact on energy supply and distribution infrastructure. To the extent known, consider energy conservation features that would be incorporated into the related projects and the impact of these features on the need for new energy supply and distribution infrastructure systems typically expected with the type of projects proposed. Determine whether new energy supply and distribution infrastructure systems would be required as a results of the combined effect of the proposed project and the related projects.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use tinted and solar reflective glass on appropriate exposures, such as the exterior-facing and/or most solar-exposed sides of the building, to reduce cooling loads;
- Use natural lighting and/or lighting types that are more efficient than incandescent lighting;
- Incorporate light sensors which automatically shut off the lights when occupants have left the room;

- Use lighting switches and thermostats equipped with multi-switch provisions for control by occupants and building personnel;
- Time control public area lighting, both interior and exterior;
- Install a variable air volume system which reduces energy consumption for air cooling and heating or water heating;
- Design the project with air conditioning which will have a 100 percent outdoor air economizer cycle to obtain free cooling during dry outdoor climatic periods;
- Do not allow office lighting loads to exceed an average 2.3 watts per square foot of conditioned floor area:
- Control mechanical systems (heating, ventilation, and air conditioning (HVAC)) and lighting) with computer time clocks;
- Recycle lighting system heat for space heating during cool weather. Exhaust lighting system heat via ceiling plenums, to reduce cooling loads in warm weather;
- Cascade ventilation air from high-priority areas to low-priority areas before being exhausted, thereby decreasing the volume of ventilation air required. For example, cascade air from occupied space to corridors to mechanical spaces before being exhausted;
- Distribute electricity within the project at 480/277 volts, three-phase, and stepped down where necessary for 110-volt outlets using dry transformers. Operate installed lighting systems at 227 volts;
- Design buildings to be well-sealed and include vestivules to prevent outside air from infiltrating and increasing interior space conditioning loads;
- Finish exterior walls and roofs with light-colored materials with high emissivity characteristics to reduce cooling loads. Use light-colored materials for interior walls to reflect more light and thus increase lighting efficiency;
- Use solar water heating for swimming pools.

3. DATA, RESOURCES, AND REFERENCES

LADWP, 111 North Hope Street, Los Angeles, California 90012; Power System Telephone: (213) 367-0285.

City Planning Department, Community Planning Bureau, 200 N. Spring St., City Hall, Los Angeles, California 90012; Telephone: (Eastside) (213)-978-1183, (Metro/Central) (213)-978-1179, (South LA) (213)-978-1168, (West/Coastal) (213)-978-1177, (Valley - 6262 Van Nuys Blvd., Van Nuys, California 91401) (818) 347-5055.

The Gas Company, (213) 244-2518, for information regarding natural gas consumption and infrastructure.

LAMC Sections 12.95.2 and 12.95.3 require projects, which include conversion of residential, commercial, or industrial uses, to submit a report concerning compliance with the Title 24 energy conservation standards.

LADWP, Power for the 21st Century (brochure).

LADWP, The Power System and Los Angeles (brochure).

LADWP, Los Angeles Department of Water and Power (brochure).

Electrical Consumption

The largest single source of power supply for the LADWP is coal, which provides 55 percent of the City's energy. Oil and natural gas provide about 20 percent of the City's energy; hydroelectricity accounts for about four percent; nuclear, 10 percent; and the remainder (11 percent) comes from purchased power.³ The sources of coal-fired power production are three coal-fired power plants located outside California, in which the LADWP owns shares. The greatest amount of coal-fired power is received from the Intermountain Generating Station near Delta, Utah. About one-fifth of the LADWP's power production is received from the Mohave Power Plant in southern Nevada and the Navajo Power Project near Page, Arizona. Of the four power plants producing energy from natural gas located within the Los Angeles Basin, the largest of these is the Haynes Generating Station in Long Beach. The other plants are the Valley, Harbor, and Scattergood generating stations.

³ LADWP, Statistics, Fiscal Year 1991-1992"

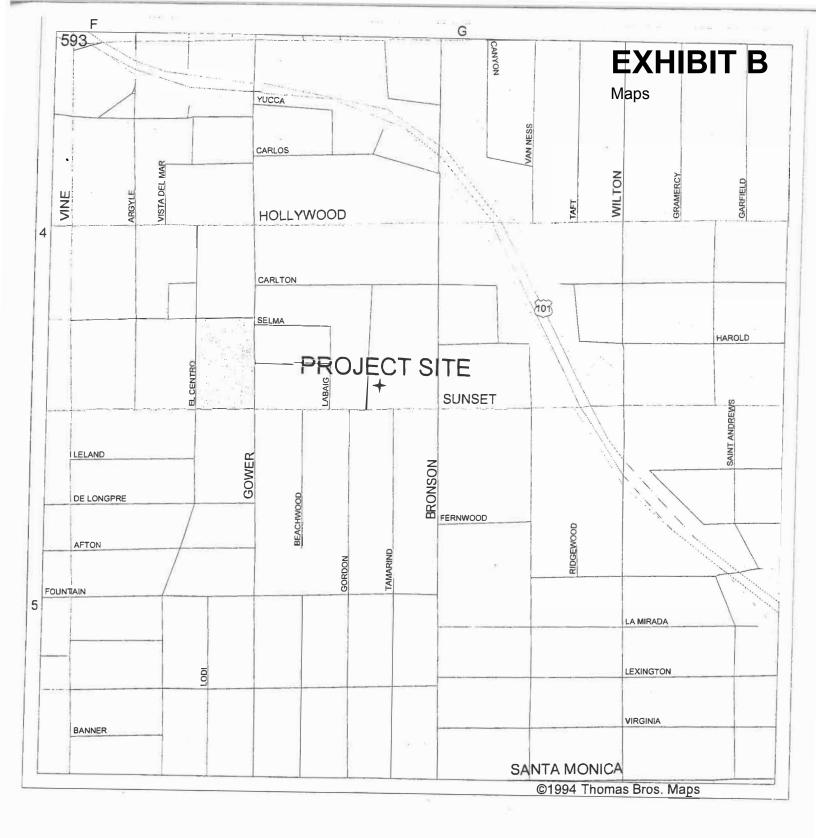
The two main hydroelectric power plants serving the City include Hoover Dam, on the Colorado River, and Castaic Power Plant, on the California State Aqueduct, about 22 miles north of the City. In addition, hydroelectric power is derived from several smaller Los Angeles Aqueduct stations, as well as purchased from other producers, mainly the Columbia River Power System. Nuclear power has been a source of electricity for the City since 1986, from the Palo Verde Nuclear Generating Station near Phoenix.

The LADWP has 21 receiving stations, designed to handle large quantities of bulk power from the major transmission lines connected to the power generating plants in California and neighboring states. The receiving stations lower the voltage of electricity to subtransmission levels, sending the power on to 120 distributing stations in the City. The distribution stations either serve a large manufacturing or commercial center directly or, as in most cases, they each supply a five- to tensquare mile area for residential and business consumers. The distribution stations reduce the voltage from 34,500 to 4,800 volts for efficient distribution of electricity to local transformers. The local distribution system consists of 6,100 miles of overhead pole-lines and 2,200 miles of underground cable.⁴

To accommodate future needs, the LADWP prepares 10-year and 20-year plans. The 10-year plan, updated annually, forecasts demand, distribution, and transmission needs to maintain system integrity. The 20-year plan, also updated annually, forecasts resource needs based on demand projections. The power system is designed to accommodate the maximum peak load of the City, which far exceeds the needs of any one project. In addition, the Electrical Infrastructure Systems Element of the General Plan indicates where major transmission facilities are anticipated.

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⁴ LADWP, The Power System and Los Angeles, December 1990.

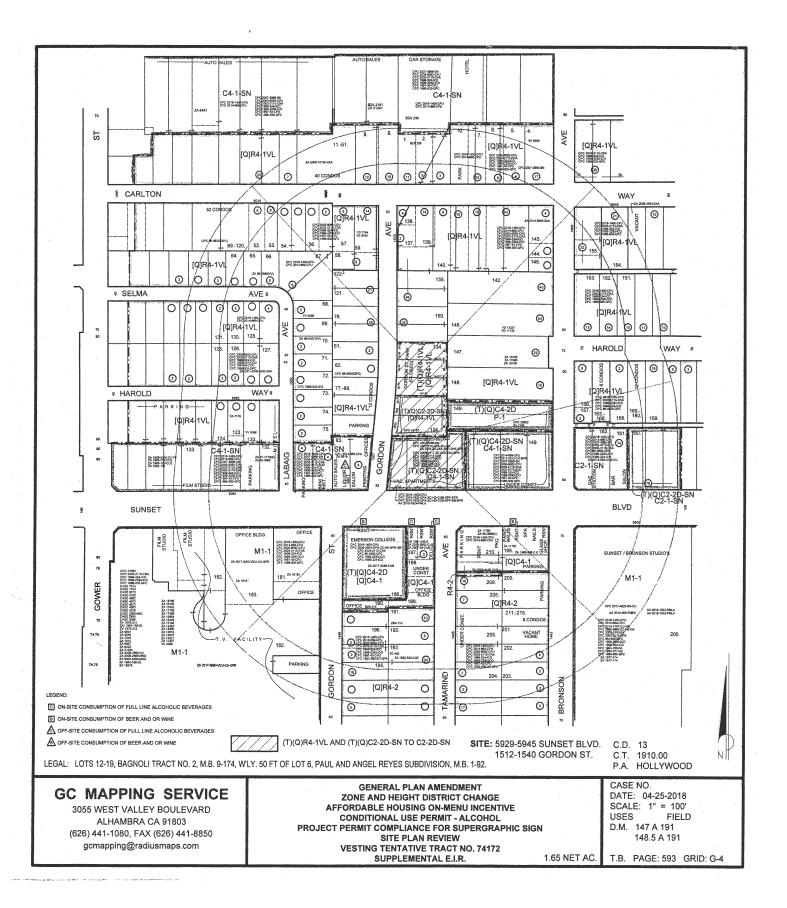


VICINITY MAP

8ITE: 5929-5945 SUNSET BLVD. / 1512-1540 N. GORDON STREET

GC MAPPING SERVICE, INC.

3055 WEST VALLEY BOULEVARD ALHAMBRA CA 91803 (626) 441-1080, FAX (626) 441-8850 GCMAPPING@RADIUSMAPS.COM



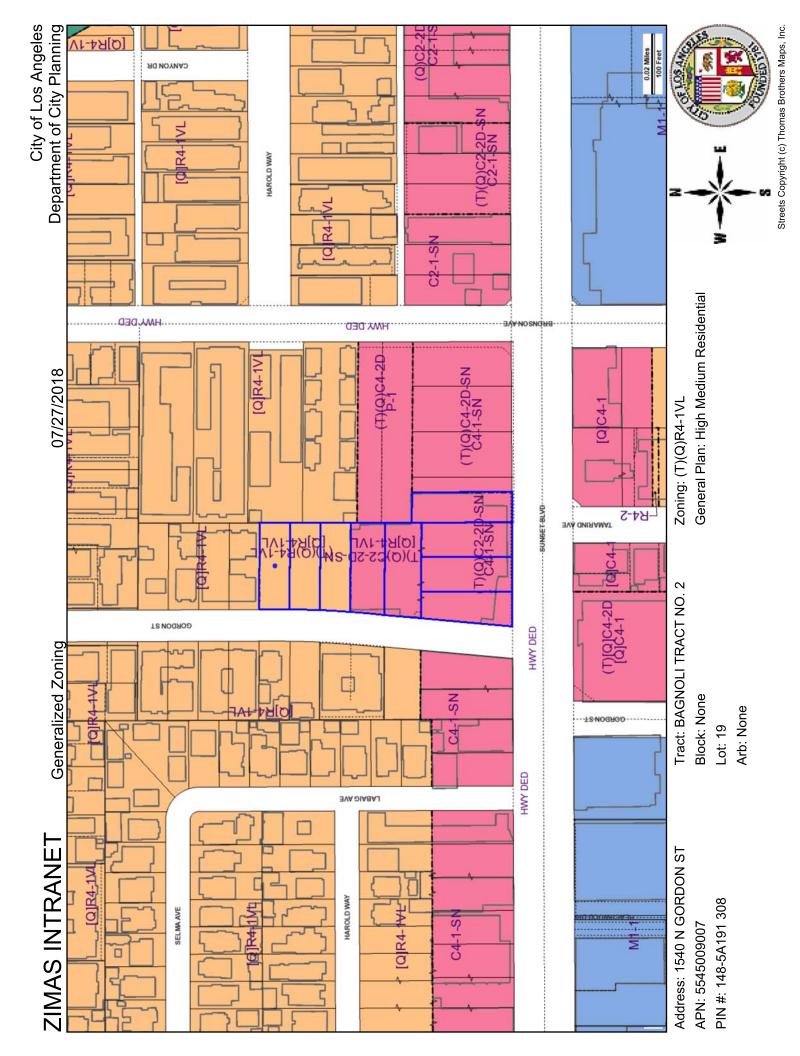


EXHIBIT C

Advisory Agency's Determination Letter

DEPARTMENT OF CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON VICE-PRESIDENT

CAROLINE CHOE
VAHID KHORSAND
KAREN MACK
SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES COMMISSION OFFICE MANAGER (213) 978-1300

CITY OF LOS ANGELES

CALIFORNIA



EXECUTIVE OFFICES 200 N. SPRING STREET, ROOM 525 LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP DIRECTOR (213) 978-1271

KEVIN J. KELLER, AICP EXECUTIVE OFFICER (213) 978-1272

LISA M. WEBBER, AICP DEPUTY DIRECTOR (213) 978-1274

http://planning.lacity.org

Decision Date: June 29, 2018

Last Day to Appeal: July 9, 2018

Shaul Kuba (A/O) 5929 Sunset (Hollywood), LLC 4700 Wilshire Boulevard Los Angeles, CA 90010

Katherine Casey (R)
Craig Lawson & Co., LLC
3221 Hutchison Avenue, Suite #D
Los Angeles, CA 90034

RE: Vesting Tentative Tract No. 74172

Related Case: CPC-2015-1922-GPA-VZC-

HD-CUB-DB-SPR

5929-5945 West Sunset Boulevard and

1512-1540 North Gordon Street Hollywood Community Plan Area

Zone: (T)(Q)C2-2D-SN and (T)(Q)R4-1VL

District Map: 147A191

Council District: 13 – Mitch O'Farrell

CEQA: ENV-2015-1923-EIR

Legal Description: Lots 12-19, Bagnoli Tract No. 2; and Lot FR6 (Arb1), Paul and Angel Reyes Subdivision of the East 5 Acres of the South East ¼ of the North West ½ of Section 11 Township 1 South

Range 14 West SBM

The Advisory Agency has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft Supplemental EIR, No. ENV-2015-1923-EIR (State Clearinghouse No. 2006111135), dated August 24, 2017, and the Final Supplemental EIR, May 25, 2018 (Sunset and Gordon Mixed-Use Project Supplemental EIR), as well as the whole of the administrative record.

CERTIFY the following:

- 1. The Sunset and Gordon Mixed-Use Project Supplemental EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- 2. The Sunset and Gordon Mixed-Use Project Supplemental EIR was presented to the Advisory Agency as a decision-making body of the lead agency; and

3. The Sunset and Gordon Mixed-Use Project Supplemental EIR reflects the independent judgment and analysis of the lead agency.

ADOPT all of the following:

- 1. The related and prepared Sunset and Gordon Mixed-Use Project Supplemental EIR Environmental Findings;
- 2. The Statement of Overriding Considerations; and
- 3. The Mitigation Monitoring Program prepared for the Sunset and Gordon Mixed-Use Project Supplemental EIR.

In accordance with provisions of Section 17.03 of the Los Angeles Municipal Code (LAMC), the Advisory Agency conditionally approved Vesting Tentative Tract Map No. 74172 composed of one (1) master lot and one (1) airspace lot (above and below grade), and for the limited dedication and merger of Gordon Street below-grade at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk. located at 5929-5945 West Sunset Boulevard and 1512-1540 North Gordon Street for a 22-story residential development consisting of an 18-floor residential tower above a four-level above-grade podium structure including three levels of subterranean parking and three levels of above-grade parking, and containing a maximum of 299 apartment units, 46,110 square feet of commercial space, and an 18,962-square-foot public park, as shown on revised map stamp-dated June 20, 2018, in the Hollywood Community Plan. (The subdivider is hereby advised that the LAMC may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety which will legally interpret the Zoning Code as it applies to this particular property.) The Advisory Agency's approval is subject to the following conditions:

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

- 1. That the existing parking structure area below the public sidewalk along <u>Gordon</u> <u>Street</u> 4-foot wide measured from the existing property line and approximately 0.3-foot below finished sidewalk grade and as shown on the revised Vesting Tentative Map stamp dated June 20, 2018 be permitted to be merged with the remainder of the tract map pursuant to Section 66499.20.2 of the State Government Code, and in addition, the following conditions be executed by the applicant and administered by the City Engineer:
 - a. That consents to the area being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged.

- b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.
- 2. That a Covenant and Agreement be recorded satisfactory to the City Engineer binding the subdivider and all successors to the following:
 - a. That the owners shall be required to maintain all elements of the structure below the rights-of-way (Gordon Street) in a safe and usable condition to the satisfaction of the City Engineer. The City shall be given reasonable access to the structure within and adjacent to the below street rights-of-way area for any necessary inspection, upon request during normal business hours. The City may request the owners to repair or replace damaged, defective or unsafe structural elements or to correct unacceptable conditions at the owner's expense if owner elects not to do so. Owner shall grant reasonable access to City's contractor to make said repairs.
 - b. The owner shall be required to limit use and occupancy of the structures below the rights-of-way for **parking use** only. **No combustible material** shall be stored in the merger area.
 - c. The owners shall obtain a B-permit from the City Engineer for any substantial structural modification below the street right-of-way area and for any structural modification areas and for any structural element outside said areas which provides lateral or vertical support to structures within the areas.
- 3. That the subdivider execute and record an agreement satisfactory to the City Engineer to waive any right to make or prosecute any claims or demands against the City for any damage that may occur to the proposed structure underneath the of public right-of-way (Gordon Street) in connection with the use and maintenance operations within said right-of-way.
- 4. That any surcharge fee in conjunction with the street merger request be paid.
- 5. That a Certified Survey Plan showing detail below grade information for the structure being merged be submitted for the Final Map check purposes.
- 6. That a set of drawings for airspace lots be submitted to the City Engineer showing the followings:
 - a. Plan view at different elevations.
 - b. Isometric views.
 - c. Elevation views.
 - d. Section cuts at all locations where air space lot boundaries change.

- 7. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.
- 8. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of the existing sewers in this area.

Any questions should be directed to Mr. Georgic Avanesian of the Land Development Section, located at 201 North Figueroa Street, Suite 200, or by calling (213) 202-3484.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

- 9. Per Section 17.56 of the LAMC, each approved Tract Map recorded with the County Recorder shall contain the following statement: "The approval of this Tract Map shall not be construed as having been based upon geological investigation such as will authorize the issuance of building permits on the subject property. Such permits will be issued only at such time as the Department of Building and Safety has received such topographic maps and geological reports as it deems necessary to justify the issuance of such building permits."
- The applicant shall comply with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

- 11. <u>That prior to recordation of the final map</u>, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:
 - a. Provide a copy of CPC case CPC-2015-1922-GPA-ZC-HD-CUB-SPP-SPR. Show compliance with all the conditions/requirements of the CPC case as applicable.
 - b. Provide a copy of affidavit AFF-6193, AFF-12591, AFF-45853, and AFF-45997. Show compliance with all the conditions/requirements of the above affidavits as applicable. Termination of above affidavits may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.
 - c. Zone Change must be recorded prior to obtaining Zoning clearance.
 - d. Comply with applicable (T) and (Q) conditions.

- e. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be rechecked as per net lot area after street dedication.
- f. Obtain Bureau of Engineering approval for the proposed street mergers.
- g. Record a Covenant and Agreement to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

Notes: Each Air Space lot shall have access to a street by one or more easements or other entitlements to use in a form satisfactory to the Advisory Agency and the City Engineer.

The Proposed project site is within the Regional Center Commercial Area.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Laura Duong at (213) 482-0434 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

- 12. <u>That prior to recordation of the final map</u>, satisfactory arrangements shall be made with the Department of Transportation to assure:
 - a. A minimum of 60-foot reservoir space be provided between any security gate(s) and the property line or to the satisfaction of the Department of Transportation.
 - b. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.
 - A parking area and driveway plan be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to issuance of building permits by the Department of Building and Safety.

- Transportation approvals are conducted at 201 N. Figueroa St., Room 550. For an appointment, call (213) 482-7024.
- d. That a fee in the amount of \$205 be paid for the Department of Transportation as required per Ordinance No. 180,542 and LAMC Section 19.15 prior to recordation of the final map. Note: the applicant may be required to comply with any other applicable fees per this new ordinance.

FIRE DEPARTMENT

- 13. <u>That prior to the recordation of the final map</u>, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:
 - a. During demolition, the Fire Department access will remain clear and unobstructed.
 - b. Access for Fire Department apparatus and personnel to and into all structures shall be required.
 - One or more Knox Boxes will be required to be installed for LAFD access to project - location and number to be determined by LAFD Field inspector. (Refer to FPB Req # 75).
 - d. 505.1 Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.
 - e. The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.
 - f. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
 - g. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - h. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - i. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)

- i. When this exception is applied to a fully fire sprinkled residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
- ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.
- iii. This policy does not apply to single-family dwellings or to non-residential buildings.
- j. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
- k. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend onto the roof.
- I. Entrance to the main lobby shall be located off the address side of the building.
- m. Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
- Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
- p. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
- q. All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a

- Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
- r. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- s. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
- t. Fire lanes, where required and dead ending streets shall terminate in a culde-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- u. Submit plot plans indicating access road and turning area for Fire Department approval.
- v. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
- w. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- x. Site plans shall include all overhead utility lines adjacent to the site.
- y. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.
- z. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

- aa. City of Los Angeles Fire Department Hydrants and Access design requirements for the Outdoor and indoor use of dependent access (attended parking) Mechanical Car Stackers 2, 3, & 4 by levels high. The provisions of this document shall regulate the use of Mechanical Car Stackers by addressing the arrangement, location and size of areas, height, separations, housekeeping, and fire protection.
- bb. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities.
- cc. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

Note: The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting please call **(213) 482-6509**. You should advise any consultant representing you of this requirement as well.

DEPARTMENT OF WATER AND POWER

14. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

BUREAU OF STREET LIGHTING - SPECIFIC CONDITIONS

15. Street Lighting clearance for this Street Light Maintenance Assessment District condition is conducted at 1149 S. Broadway Suite 200. Street Lighting improvement condition clearance will be conducted at the Bureau of Engineering District office, see condition S-3. (c).

Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

BUREAU OF SANITATION

16. Wastewater Collection Systems Division of the Bureau of Sanitation has inspected the sewer/storm drain lines serving the subject tract and found no/or potential problems to their structure or potential maintenance problem, as stated in the memo dated June 4, 2018. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

DEPARTMENT OF RECREATION AND PARKS

17. That the Quimby fee be based on the C2 Zone.

INFORMATION TECHNOLOGY AGENCY

18. To assure that cable television facilities will be installed in the same manner as other required improvements, please email cabletv.ita@lacity.org that provides an automated response with the instructions on how to obtain the Cable TV clearance. The automated response also provides the email address of three people in case the applicant/owner has any additional questions.

DEPARTMENT OF CITY PLANNING - SITE SPECIFIC CONDITIONS

- 19. <u>Prior to the recordation of the final map</u>, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - a. Limit the proposed development to a maximum of 299 residential units and 46,110 square feet of commercial floor area.
 - b. Parking shall be provided pursuant to LAMC Sections 12.21 A.4 and 12.22 A.25 and/or as modified by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The final tract map shall show the required number of parking spaces pursuant to LAMC Sections 12.21 A.4 and 12.22 A.25 and/or modified by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR.
 - c. The applicant shall install an air filtration system(s) to reduce the effects of diminished air quality on occupants of the project.
 - d. That the subdivider consider the use of natural gas and/or solar energy and consult with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

- e. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.
- f. INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, of if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation. For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Action includes actions, as defined herein, alleging failure to comply with <u>any</u> federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

- 20. That prior to the issuance of the building permit or the recordation of the final map, a copy of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider shall submit a tract modification.
- 21. Prior to the recordation of the final map, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make the number of affordable housing units approved by Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR available for rental solely to Very Low Income households at a rental price determined to be affordable to Very Low Income households by HCIDLA, for a period of 55 years. Said units shall be comparable in size, number of bedrooms, distribution, and amenities to the non-income-restricted units in the development.

DEPARTMENT OF CITY PLANNING - ENVIRONMENTAL MITIGATION MEASURES

22. Prior to recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770 and Exhibit CP-6770.M), in a manner satisfactory to the Planning Department requiring the subdivider to identify (a) mitigation monitor(s) who shall provide periodic status reports on the implementation of mitigation items required by Mitigation Condition No. 23 and 26 of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitor(s) shall be identified as to their areas of responsibility, and

phase of intervention (pre-construction, construction, post construction/ maintenance) to ensure continued implementation of the above mentioned mitigation items.

23. <u>Prior to the recordation of the final map</u>, the subdivider will prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

The Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The City of Los Angeles is the Lead Agency for the project and therefore is responsible for administering and implementing the MMP. Where appropriate, the project's Draft and Final EIRs identified mitigation measures and project design features to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur, or impacts would be reduced to the extent feasible. The MMP is designed to monitor implementation of the project's mitigation measures as well as its project design features. Each required mitigation measure and proposed project design feature for the project is listed and categorized by impact area, with an accompanying identification of the following:

- Enforcement Agency: The agency with the power to enforce the Mitigation Measure/Project Design Feature.
- Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation and development are made.
- Monitoring Phase: The phase of the project during which the Mitigation Measure/Project Design Feature shall be monitored.
- Monitoring Frequency: The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.

 Action Indicating Compliance: The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

The project's MMP will be in place throughout all phases of the project. The project applicant will be responsible for implementing all mitigation measures unless otherwise noted. The applicant shall also be obligated to provide a certification report to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure or project design feature has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

The certification report shall be submitted to the Central Project Planning Section at the Los Angeles Department of City Planning. Each report will be submitted to the Central Project Planning Section annually following completion/implementation of the applicable mitigation measures and project design features and shall include sufficient information and documentation (such as building or demolition permits) to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the applicant, shall assure that project construction and operation occurs in accordance with the MMP.

After review and approval of the final MMP by the City, minor changes and modifications to the MMP are permitted, but can only be made by the applicant subject to the approval by the City. The City, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed changes or modification. The flexibility is necessary due to the nature of the MMP, the need to protect the environment in the most efficient manner, and the need to reflect changes in regulatory conditions, such as but not limited to changes to building code requirements. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the City.

24. **Mitigation Monitor (Construction).** During the construction phase and prior to the issuance of building permits, the applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the applicant's compliance with the Project Design Features and Mitigation Measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the applicant and Construction Monitor and be included as part of the applicant's Compliance Report. The

Construction Monitor shall be obligated to immediately report to the Enforcement Agency any noncompliance with the mitigation measures and project design features within two business days if the applicant does not correct the noncompliance within a reasonable time of notification to the applicant by the monitor or if the noncompliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

25. **Mitigation Measures and Project Design Features**. The development of the project site is hereby bound to the following Mitigation Measures (MM) and Project Design Features (PDF), which are conditions of approval for the project.

Aesthetics Views/Light and Glare

Mitigation Measures

MM A.1-1: If any street tree removals are required for the Modified Project's additional construction activities, the street trees to be removed shall be replaced on a 2:1 replacement ratio in compliance with the City of Los Angeles Department of Public Works' Bureau of Street Services, Urban Forestry Division's policies.

Enforcement Agency: City of Los Angeles Department of Public Works

and Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Public Works and

Los Angeles Department of Building and Safety

Monitoring Phase: Construction Monitoring Frequency: Ongoing

Action Indicating Compliance: None – ongoing construction compliance

required

MM A.1-2: Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction **Monitoring Frequency:** Ongoing

Action Indicating Compliance: None – ongoing construction compliance

required

Certified EIR MM IV.A-3.1: The proposed park shall be actively operated and maintained for the life of the Modified Project by the Applicant or designated non-profit organization with the experience and ability to maintain the park in

accordance with the public health and safety standards employed by the Department of Parks and Recreation.

Enforcement Agency: City of Los Angeles Department of City Planning

and City of Los Angeles Department of Recreation and Parks

Monitoring Agency: City of Los Angeles Department of City Planning and

City of Los Angeles Department of Recreation and Parks

Monitoring Phase: Operation

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.A-4.1: The Modified Project shall include low-level directional lighting at ground, podium, and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties, nor is visible from above.

Enforcement Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning and

Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.A-4.2: The Modified Project's façades and windows shall be constructed with non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

Enforcement Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning and Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Site Plan Review, Operation

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Air Quality

Mitigation Measures

Certified EIR MM IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Geology and Soils

Mitigation Measures

Certified EIR MM IV.C-2.1: The Modified Project shall be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative or as they may be amended by request of the City.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.C-2.2: The Modified Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable or as they may be amended by request of the City.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.C-5: Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Greenhouse Gases

Project Design Features

PDF D-1: To encourage carpooling and the use of electric vehicles by Modified Project residents and visitors, at least 20% of the Code required parking spaces shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicle (electric vehicle supply equipment (EVSE)) with five (5) percent of these stalls being equipped with the electrical vehicle charging stations. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated electric vehicle charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, the required number of spaces would be rounded up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once during plan check

Action Indicating Compliance: Issuance of building permit

Noise

Mitigation Measures

MM F-1.1: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.2: The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.3: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured noise levels during concurrent construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.6: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise- sensitive receptors. The intent of the Construction Noise Management Plan is to provide the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The Modified Project contractor shall use power construction equipment with state- of-the-art noise shielding and muffling devices.
- The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.
- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.
- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the
 property line of an adjacent property and construction equipment is left
 stationary and continuously operating for more than one day, a temporary
 noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at each entrance to the construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to

report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction

equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.F-5.1: The air inlets of HVAC units installed at the project site shall be oriented to the east away from the residential neighborhood to the west of the site.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.F-5.2: Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.

Enforcement Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Land Use Planning

Project Design Feature

PDF IV-H-1: The Modified Project shall install air filtration systems in compliance with the minimum MERV filtration rating requirements of ZI. No. 2427 and Clean UP Green Up Ordinance (Ord. No. 184,245), as applicable to the Modified Project's proposed land uses and regularly occupied areas.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once prior to issuance of building permit, Once

prior to issuance of Final Certificate of Occupancy

Action Indicating Compliance: Issuance of building permit, Field

inspection sign-off

Mitigation Measures

Certified EIR MM IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction

project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.1: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection
Action Indicating Compliance: Field inspection sign-off

MM F-1.2: The Modified Project contractor shall use power construction equipment with state-of- the-art noise shielding and muffling devices.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.3: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured noise levels during concurrent construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to

ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related Project 46's (located at 5901 Sunset Boulevard) construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed 0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

MM F-1.6: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise- sensitive receptors. The intent of the Construction Noise Management Plan is to provide the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- The Modified Project contractor shall use power construction equipment with state- of-the-art noise shielding and muffling devices.
- The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar

generators to power equipment rather than diesel or gasoline generators where feasible.

- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.
- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Building and Safety and

City of Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

<u>Parking</u>

Mitigation Measures

Certified EIR MM IV.K.1-2: If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

- All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.
- ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.
- iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
- iv. Trucks shall be restricted to 18-wheel trucks or smaller.
- v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).
- vi. Streets shall be cleaned of spilled materials at the termination of each work day.
- vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
- viii. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
- x. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.
- xii. All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
- xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
- xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
- xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
- xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
- xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.
- xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485- 3711 before the change takes place.
- xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.

xx. A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

Enforcement Agency: LADOT and Los Angeles Department of Building and Safety

Monitoring Agency: LADOT and Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.K.2-1: In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

Enforcement Agency: LADOT Monitoring Agency: LADOT

Monitoring Phase: Pre-Construction, Construction Monitoring

Frequency: Ongoing during field inspection

Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.H-7: The Applicant shall procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City Planning, including but not limited to the various discretionary actions as listed above in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR.

Enforcement Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and City of Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once prior to issuance of building permit, Once

prior to issuance of Final Certificate of Occupancy

Action Indicating Compliance: Issuance of building permit, Issuance of

Final Certificate of Occupancy

Solid Waste

Mitigation Measures

Certified EIR MM IV.H-4-1: The Applicant shall develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills.

Enforcement Agency: Los Angeles Department of Building and Safety and

Bureau of Sanitation

Monitoring Agency: Los Angeles Department of Building and Safety and

Bureau of Sanitation

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.H-4-2: The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

Enforcement Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation

Monitoring Agency: Los Angeles Department of Building and Safety and Bureau of Sanitation

Monitoring Phase: Operational

Monitoring Frequency: Ongoing during field inspection

Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Public Services

Police Services

Mitigation Measures

MM IV.J.1-1.1: During construction, the Modified Project shall include the following measures:

- i. A Construction Traffic Control/Management Plan shall be submitted to LADOT for review and approval.
- ii. The bulk of the work shall be conducted on site. If temporary lane closures are necessary, Street Services approval shall be obtained and closures shall be limited to non-peak commute hours from 9:00 AM to 3:00 PM.
- iii. Existing access for the site shall be maintained for construction access.
- iv. Deliveries of construction material shall be coordinated to non-peak travel periods, to the extent possible.
- v. Construction workers shall be prohibited from parking on adjacent streets and construction workers shall be directed to park on-site.

Enforcement Agency: LADOT Monitoring Agency: LADOT

Monitoring Phase: Pre-Construction, Construction

Monitoring Frequency: Once at plan check: Ongoing during field

inspection

Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-1.1: The Applicant shall erect temporary fencing suitable to prevent trespassers from entering the project site during construction activities to secure the project site and discourage trespassers.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-1.2: The Applicant shall employ security guards to monitor and secure the project site after hours during the construction process to secure the site and deter any potential criminal activity.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-2.1: In order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the

construction period, the Project shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan should include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the project if necessary.

Enforcement Agency: LADOT Monitoring Agency: LADOT

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J.1-3.1: The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Phase: Operation

Monitoring Frequency: Ongoing during field inspection

Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Certified EIR MM IV.J.1-3.2: The Applicant shall develop and implement a Security Plan in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Modified Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD West Bureau Commanding Officer. Said security plan may include some or all of the following components:

i. Provisions for on-site private security personnel for the commercial and residential areas. Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be provided. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells. All security officers shall patrol the grounds primarily by foot; however, bike patrol may be implemented in the parking garages and on the surrounding roadways.

ii. The parking garages shall be designed to cordon off residential and commercial serving parking areas to provide increased security for residents of the Modified Project. Both residential and commercial parking areas shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that will provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

Enforcement Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Agency: Los Angeles Department of Building and Safety and LAPD

Monitoring Phase: Operation

Monitoring Frequency: Ongoing during field inspection

Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Fire Protection

Project Design Features

PDF IV.J-1: Good housekeeping procedures would be implemented during the additional construction required for the Modified Project and would include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Enforcement Agency: Los Angeles Department of Building and Safety and LAFD

Monitoring Agency: Los Angeles Department of Building and Safety and LAFD

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Schools

Mitigation Measures

Certified EIR MM IV.J.3-1.1: School Bus Access

- Prior to construction, contact the LAUSD Transportation Branch at (323)
 342- 1400 regarding potential impact to school bus routes.
- Maintain unrestricted access for school buses during construction.
- Comply with Provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

Enforcement Agency: Los Angeles Department of Building and Safety and

LAFD

Monitoring Agency: LAFD

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Certified EIR MM IV.J-3.1.2: School Pedestrian/Traffic Safety Access

- Not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (LAUSD will provide School Pedestrian Route Maps upon your request).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Not haul past affected school sites, except when school is not in session. If that is infeasible, not haul during school arrival and dismissal times.
- Not staging or parking of construction-related vehicles, including workertransport vehicles, adjacent to school sites.
- Provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.
- Provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

Enforcement Agency: Los Angeles Unified School District and Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Unified School District and Los Angeles

Department of Building and Safety **Monitoring Phase:** Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Traffic/Transportation

Project Design Features

PDF K.1-2: The Modified Project shall improve the intersections of Gower Street and Sunset Boulevard (North, South, East and West Legs) and Bronson Street and Sunset Boulevard (North, South, East and West Legs) with Continental Crosswalks.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning

Monitoring Agency: LADOT and City of Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction, Construction

Monitoring Frequency: Once at plan check, Once prior to issuance of

Final Certificate of Occupancy

Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

PDF K.1-3 The Applicant shall contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. For closures that last more than six months, LACMTA's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating the Modified Project's additional construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

Enforcement Agency: Los Angeles County Metropolitan Transportation

Authority

Monitoring Agency: Los Angeles County Metropolitan Transportation

Authority

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once at plan check

Action Indicating Compliance: Issuance of building permit

Mitigation Measures

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and operational right turn lane. Because this improvement requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning

Monitoring Agency: LADOT and City of Los Angeles Department of City

Planning

Monitoring Phase: Pre-Construction, Construction

Monitoring Frequency: Once at plan check, Once prior to issuance of Final Certificate of Occupancy

Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

MM K.1-2: Bronson Avenue & Sunset Boulevard. The Modified Project shall improve the Bronson Avenue and Sunset Boulevard intersection to provide an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and an operational right turn lane. Because this improvement requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard, the Modified Project shall set aside 4 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Bronson Avenue.

Enforcement Agency: LADOT and City of Los Angeles Department of City Planning

Monitoring Agency: LADOT and City of Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction, Construction

Monitoring Frequency: Once at plan check, Once prior to issuance of Final Certificate of Occupancy

Action Indicating Compliance: Plan approval and issuance of building permits, Issuance of Final Certificate of Occupancy

MM K.1-3: The Modified Project shall implement a Transportation Demand Management (TDM) Plan, consistent with the recommendations of LADOT that would achieve a least a 10% reduction in the Modified Project's P.M. Peak Hour trips. While multiple methods of compliance may be available for certain measures, the final TDM Plan shall be reviewed and approved by LADOT prior to the certificate of occupancy for the Modified Project to ensure that the TDM Plan will provide at minimum a 10% reduction in the Modified Project's P.M. Peak Hour trips. Potential measures that could achieve a 10% reduction in the Modified Project's P.M. Peak Hour trips include the following elements:

- Establish an on-site Transportation Management Office (TMO) as part of the management office to assist residents and employees in finding alternate travel modes and strategies.
- ii. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;
- iii. Provide car sharing service for residents and employees;
- iv. Encourage alternative work arrangements for residents and employees;
- v. Improve the existing bus stop on the north side of Sunset Boulevard, east of Gordon Street;
- vi. Provide transit pass reductions of at least 25% for residents and employees;

- vii. Provide carpool and vanpool matching and preferential parking for carpools/vanpools that register with the TMO;
- viii. Provide secure bicycle facilities and bicycle sharing service for residents and employees;
- ix. Provide transit and ridesharing incentives such as points or coupons for merchandise:
- x. Provide guaranteed rides home for employees that use alternative modes of transportation or rideshare in the event of an emergency;
- xi. Provide unbundled parking for residents; and
- xii. Encourage office tenants to establish workplace parking for employees (i.e. charging employees of office tenants for some or all of their parking costs) or to establish an employee parking cash-out program.

Enforcement Agency: LADOT Monitoring Agency: LADOT

Monitoring Phase: Pre-Construction, Construction

Monitoring Frequency: Once prior to issuance of Final Certificate of

Occupancy

Action Indicating Compliance: Issuance of Final Certificate of Occupancy

Certified EIR MM IV.K.1-2 If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

- i. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.
- ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.
- iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
- iv. Trucks shall be restricted to 18-wheel trucks or smaller.
- v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).
- vi. Streets shall be cleaned of spilled materials at the termination of each work day.
- vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
- viii. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
- x. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.
- All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
- xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
- xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
- xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
- xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
- xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.
- xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485- 3711 before the change takes place.
- xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.
- xx. A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

Enforcement Agency: LADOT and Los Angeles Department of Building and Safety

Monitoring Agency: LADOT and Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off **Certified EIR MM IV.K.2-1:** In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

Enforcement Agency: LADOT **Monitoring Agency:** LADOT

Monitoring Phase: Pre-Construction, Construction Monitoring Frequency: Ongoing during field inspection Action Indicating Compliance: Field inspection sign-off

Hazardous Materials/Risk of Upset

Mitigation Measures

Certified EIR MM IV.D-1: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the release of hazardous materials resulting from the potential release of asbestos containing materials and lead-based paint during construction would be mitigated to less than significant levels. No additional mitigation measures are required.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Construction **Monitoring Frequency:** Ongoing during field inspection

Action Indicating Compliance: Issuance of demolition permit, Field

inspection sign-off

Certified EIR MM IV.D-2: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the potential release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, Construction **Monitoring Frequency:** Ongoing during field inspection

Action Indicating Compliance: Issuance of demolition permit, Field inspection sign-off

Certified EIR MM IV.D-3.1: The Modified Project shall maintain appropriate fire and police access to the project site during the construction process.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.D-3.2: To the maximum extent feasible, the Modified Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours.

Enforcement Agency: Los Angeles Department of Building and Safety **Monitoring Agency:** Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

Certified EIR MM IV.D-5: The Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

Enforcement Agency: Los Angeles Department of Building and Safety, LAFD, and City of Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety and

LAFD, City of Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction

Monitoring Frequency: Ongoing during field inspection **Action Indicating Compliance:** Field inspection sign-off

- 26. **Construction Mitigation Conditions** Prior to the issuance of a grading or building permit, or the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - CM-1 That a sign be required on site clearly stating a contact/complaint telephone number that provides contact to a live voice, not a recording or voice mail, during all hours of construction, the construction site address, and the tract map number. YOU ARE REQUIRED TO POST THE SIGN 7 DAYS BEFORE CONSTRUCTION IS TO BEGIN.
 - Locate the sign in a conspicuous place on the subject site or structure (if developed) so that it can be easily read by the public.

The sign must be sturdily attached to a wooden post if it will be freestanding.

- Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.
- If the case involves more than one street frontage, post a sign on each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

- S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the Los Angeles Municipal Code (LAMC).
 - (b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.
 - (c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.
 - (d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.
 - (e) That drainage matters be taken care of satisfactory to the City Engineer.
 - (f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.
 - (g) That any required slope easements be dedicated by the final map.
 - (h) That each lot in the tract comply with the width and area requirements of the Zoning Ordinance.

- (i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.
- (j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.
- (k) That no public street grade exceeds 15%.
- (I) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.
- S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:
 - (a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.
 - (b) Make satisfactory arrangements with the Department of Traffic with respect to street name, warning, regulatory and guide signs.
 - (c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.
 - (d) All improvements within public streets, private streets, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.
 - (e) Any required bonded sewer fees shall be paid <u>prior to recordation of the final map</u>.
- S-3. That the following improvements be either constructed <u>prior to recordation of the final map</u> or that the construction be suitably guaranteed:
 - (a) Construct on-site sewers to serve the tract as determined by the City Engineer.
 - (b) Construct any necessary drainage facilities.

- (c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.
 - No street lighting improvements if no street widening per BOE improvement conditions. Otherwise, relocate and upgrade street lights:
 - 1. two (2) on Gordon Street; and
 - 2. three (3) on Sunset Boulevard.

Note: The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

- (d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Urban Forestry Division ((213) 847-3077) upon completion of construction to expedite tree planting.
- (e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.
- (f) Construct access ramps for the handicapped as required by the City Engineer.
- (g) Close any unused driveways satisfactory to the City Engineer.
- (h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units. This vesting map does not constitute approval of any variations from the Los Angeles Municipal Code (LAMC), unless approved specifically for this project under separate conditions.

Any removal of the existing street trees shall require Board of Public Works approval.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with Section 17.05-N of the LAMC.

The final map must be recorded within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

I. Introduction

The Supplemental Environmental Impact Report ("Supplemental EIR"), consisting of the Draft Supplemental EIR and Final Supplemental EIR, was prepared in accordance with the California Environmental Quality Act ("CEQA"), and the City of Los Angeles L.A. CEQA Thresholds Guide (2006) (ENV-2015-1923-EIR, State Clearinghouse Number: 2006111135). The Supplemental EIR is an informational document for public agency decision-makers and the general public regarding the objectives and components of the project. The project site is located at the northeast corner of the intersection of Sunset Boulevard and Gordon Street in the Hollywood Community Plan area in the City of Los Angeles. The project addresses include 5929-5945 W. Sunset Boulevard / 1512 – 1540 N. Gordon Street. The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park.

On October 18, 2007, the Community Redevelopment Agency of the City of Los Angeles ("CRA"), acting as the lead agency, certified the Environmental Impact Report ("Certified EIR") and adopted findings and a statement of overriding considerations for the Sunset and Gordon Mixed-Use Project ("CRA Approved Project"). The Certified EIR analyzed the demolition of existing uses on the project site and the development of an approximately 324,432 square-foot mixed use project including: 311 multi-family residences, approximately 53,500 square feet of commercial space consisting of 40,000 square feet of creative office space and 13,500 square feet of retail floor area (including 8,500 square feet of restaurant uses), approximately 508 parking spaces, a 21,177 square-foot public

park on the north side of the project site along Gordon Street, and two supergraphic signs. The CRA Approved Project included a 23-story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure with three to four levels of subterranean parking.

5929 Sunset (Hollywood), LLC (the "Applicant") proposes to modify the CRA Approved Project to allow for the development of a 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units), approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square foot coffee shop), an approximately 18,962 square-foot public park, and one supergraphic sign (the "Modified Project"). In total, the Modified Project will contain approximately 324,693 square feet of floor area.

II. Environmental Documentation Background

Serving as Lead Agency, the Los Angeles Department of City Planning ("Planning Department") reviewed the Initial Study prepared for the Modified Project and determined that the project required a supplemental EIR. CEQA (California Public Resources Code §21000 et seq.) requires lead agencies to prepare supplemental EIRs when one or more of the following events occur: "(a) [s]ubstantial changes are proposed in the project which will require major revisions of the environmental impact report. (b) [s]ubstantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report. (c) [n]ew information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available" (CEQA § 21166.) Likewise, the CEQA Guidelines (California Code of Regulations (CCR) § 15000 et seq.) provide that a lead agency may prepare a supplemental EIR if "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation." (CEQA Guidelines, § 15163(a)(2).) Here, the Lead Agency determined that a supplemental EIR is warranted because only minor additions or changes to the CRA Approved Project are necessary to make the Certified EIR adequately apply to the Modified Project.

In compliance with CEQA Section 21080.4 and Section 15082 of the CEQA Guidelines, a Notice of Preparation ("NOP") was prepared by the Planning Department and distributed for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on October 15, 2015. The NOP was circulated for a 30-day review period starting on October 15, 2015 and ending on November 16, 2015. The purpose of the NOP was to formally inform the public that the City was preparing a Draft Supplemental EIR for the Modified Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft Supplemental EIR. The Initial Study attached to the NOP identified those environmental topics for which the proposed Modified Project could have adverse environmental effects and concluded that a supplemental EIR would need to be prepared

to document these effects. A copy of the NOP and Initial Study and the NOP comment letters are included in Appendix A and B of the Draft Supplemental EIR and Appendix B of the Final Supplemental EIR. The City held a public scoping meeting on October 29, 2015, to present the proposed Modified Project and to solicit input from interested individuals regarding environmental issues that should be addressed in the Draft Supplemental EIR.

The Draft Supplemental EIR, including analyses of environmental issues raised during the public scoping process, was submitted to the State Clearinghouse, Office of Planning and Research, and circulated for a 46-day public review from August 24, 2017 to October 9, 2017. The Draft Supplemental EIR evaluated in detail the potential environmental effects of the proposed Modified Project. It also analyzed the effects of a reasonable range of alternatives including potential effects of a "No Project" alternative. Following the close of the public review period, written responses were prepared to the comments received on the Draft Supplemental EIR. The comments on the Draft Supplemental EIR and the responses to those comments are included within the Final Supplemental EIR.

The City released a Final Supplemental EIR for the Modified Project on May 25, 2018, which is hereby incorporated by reference in full. The Final Supplemental EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the Modified Project. The Final Supplemental EIR addresses the environmental effects associated with implementation of the Modified Project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft Supplemental EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft Supplemental EIR at least 10 days prior to certification of the Final Supplemental EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals that commented on the Draft Supplemental EIR also received a copy of the Final Supplemental EIR. The Final Supplemental EIR was also made available for review on the Planning Department website. Copies of the Final Supplemental EIR were also made available at three libraries and the Planning Department. Notices regarding availability of the Final Supplemental EIR and the Notice of Public Hearing were sent to those within a 500-foot radius of the project site, as well as individuals who commented on the Draft Supplemental EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed joint public hearing for the Modified Project was held by the Deputy Advisory Agency (DAA) and Hearing Officer on behalf of the City Planning Commission on June 20, 2018.

At the duly noticed joint public hearing, the DAA approved the No Automated Steel Parking Structure Alternative, which is identified as the Environmentally Superior Alternative in the Supplemental EIR. The No Automated Steel Parking Structure Alternative requires the adoption of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Planning Department, 200 North Main Street, Room 621, Los Angeles, California 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

III. Findings required to be made by Lead Agency under CEQA

Section 21081 of CEQA and Section 15091 of the CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts. The possible findings are:

- "Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(1))
- "Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (CEQA Guidelines, § 15091, subd. (a)(2))
- "Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(3))

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant or potentially significant in the Final Supplemental EIR for the Modified Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings will nevertheless fully account for all such effects identified in the Final Supplemental EIR for the purpose of better understanding the full environmental scope of the proposed Modified Project. For each of the significant impacts associated with the Modified Project, either before or after mitigation, the following sections are provided:

<u>Description of Significant Effects</u> – A specific description of the environmental effects identified in the Supplemental EIR, including a judgment regarding the significance of the impact.

<u>Project Design Features</u> – Identified project design features or actions that are included as part of the proposed Modified Project (numbering of the Project Design Features corresponds to the Mitigation Monitoring Program, which is included as Section IV of the Final Supplemental EIR).

<u>Mitigation Measures</u> – Identified Mitigation Measures or actions that are required as part of the Modified Project (numbering of the Mitigation Measures corresponds to the

Mitigation Monitoring Program, which is included as Section IV of the Final Supplemental EIR).

<u>Finding</u> – One or more of three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091.

Rationale for Finding – A summary of the reasons for the finding(s).

<u>Reference</u> – A notation on the specific section in the Supplemental EIR, which includes the evidence and discussion of the identified impact.

IV. Description of the Proposed Modified Project

A. Project Overview

On October 18, 2007, the CRA certified the Certified EIR and adopted findings and a statement of overriding considerations for the Sunset and Gordon Mixed-Use Project. The Certified EIR analyzed the demolition of existing uses on the project site and the development of an approximately 324,432 square-foot mixed use project including: 311 multi-family residences, approximately 53,500 square feet of commercial space consisting of 40,000 square feet of creative office space and 13,500 square feet of retail floor area (including 8,500 square feet of restaurant uses), approximately 508 parking spaces, a 21,177 square-foot public park on the north side of the project site along Gordon Street, and two supergraphic signs. The project analyzed in the Certified EIR included a 23-story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure with three to four levels of subterranean parking.

The Certified EIR explained that the applicant was exploring options to retain and restore the exterior façade and various interior treatments of the Old Spaghetti Factory building at 5939 Sunset Boulevard Building ("OSF Building") to memorialize the social significance of the building as it relates to the development of the Hollywood area. The Certified EIR further explained the proposal as a partial structural treatment plan to retain and incorporate a portion of the OSF Building as a prominent design element at the corner of Sunset Boulevard and Gordon Street. The Certified EIR explained that since none of the buildings located on the project site were deemed historically or culturally significant, demolition and/or remodel of these structures would not significantly impact any historic or cultural resource.

On October 18, 2007, the CRA adopted Resolution No. 7094 that certified that the Final EIR was completed in compliance with CEQA and the CEQA Guidelines, that the information contained in the Final EIR and the Erratum to the Final EIR had been reviewed and considered by the Commissioners of the CRA prior to considering the proposed project, and that the Final EIR and the Erratum to the Final EIR reflected the independent judgment and analysis of the CRA. On December 14, 2007, the CRA subsequently adopted Resolution No. 7095 approving CEQA findings for the approval of the project, a statement of overriding considerations, and a mitigation monitoring and reporting program. The CRA's actions were subsequently approved by the Los Angeles City

Council. The project as analyzed in the Certified EIR is referred to as the "CRA Approved Project."

The Applicant proposes to modify the CRA Approved Project to allow for the development of the Modified Project which would contain 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units), approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square-foot coffee shop), an approximately 18,962 square-foot public park, and one supergraphic sign. In total, the Modified Project will contain approximately 324,693 square feet of floor area.

The Modified Project will include a 22-story structure consisting of an 18-floor residential tower above a four-level above-grade podium structure. The Modified Project's podium structure will have three levels below grade and three levels above-grade parking and a new automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. The Modified Project will provide 353 residential parking spaces and 75 commercial parking spaces (for a total of 428 parking spaces). As an alternative related to parking, the Applicant may seek approval of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls to increase the available on-site parking supply to benefit the surrounding community in this area of Hollywood. Under this alternative, the Modified Project would provide approximately 508 parking spaces within the Modified Project's parking structure, which would have three levels below grade, three levels above-grade parking, and the new automated steel parking structure.

As compared to the CRA Approved Project, instead of possibly retaining and incorporating a portion of the OSF Building, the Modified Project would demolish the OSF Building and incorporate a replica of its façade in approximately the same position and dimensions of the demolished building. The replica of the façade would recreate the design elements of the OSF Building within the original footprint of the OSF Building, which includes two symmetrical wings embracing a wide centrally located opening supported by six massive Tuscan columns, as well as the façade's overall Spanish Colonial Revival style. Externally, the replica of the OSF Building façade would have the same height, size, and color as the OSF Building. The interior of the replica of the OSF Building façade would incorporate many of the same elements (height, size, and color). The interior space would also incorporate four of the building's original wood trusses and the fireplace mantle. Additionally, the windows and doors of the replica of the OSF Building would be designed to resemble the style of the OSF Building. The Modified Project's replica of the building facade is consistent with the Certified EIR's description of the option to not retain and/or restore the building façade, but instead to memorialize the social significance of this building as it relates to the development of the Hollywood area.

B. Project Location and Surrounding Uses

The project site is located at the northeast corner of the intersection of Sunset Boulevard and Gordon Street in the Hollywood Redevelopment Project and the Hollywood Community Plan Area in the City of Los Angeles. The project site is bounded by multifamily residential land uses to the north, Gordon Street to the west, Sunset Boulevard to the south, surface parking and multi-family residential land uses to the east. On a regional level, the project site is located approximately 0.25 miles west of the Hollywood Freeway (US-101), 3.8 miles south of the 134 Freeway, 4.5 miles northwest of the Harbor Freeway (SR 110), and 4.25 miles north of the Santa Monica Freeway (I-10). Locally, the project site is accessible via Sunset Boulevard and Gordon Street

The project site encompasses approximately 1.65 acres (72,154 sf) of total surface area and includes Lots 12, 13, 14, 15, and 16 of the Bagnoli Tract No. 2 (Assessor Parcel No. (APN) 5545-009-035), the west 50 feet of Lot 6 of the Paul and Angel Reyes Subdivision (APN 5545-009-031), and Lots 17, 18, and 19 of the Bagnoli Tract No. 2 (APNs 5545-009-005, 5545-009-006, 5545-009-007).

Multiple public transportation opportunities are provided in the vicinity of the project site. Public transportation in the surrounding area is provided by Metropolitan Transit Authority (Metro) and the City of Los Angeles Department of Transportation Dash service (DASH), subway Metro Rail, and Metro Express.

C. Project Background

On October 18, 2007, the CRA, acting as the lead agency under CEQA, certified the EIR for the CRA Approved Project and adopted findings and a statement of overriding considerations. In September 2008 the City of Los Angeles approved the land use entitlements for the Sunset and Gordon Mixed-Use Project. As part of the approvals, the Los Angeles City Council, acting as the responsible agency under CEQA, considered the information contained in the Certified EIR pursuant to CEQA Guidelines section 15096 and adopted findings and a statement of overriding considerations in accordance with CEQA section 21081. Due to litigation challenging the City's entitlements, and a downturn in the national economy, the project was not immediately constructed. The original owner/developer went into bankruptcy and the property was taken over by a receiver. In August of 2011, the Applicant purchased the property from the receiver. The Applicant then undertook steps to move forward with development within the scope of the City's September 2008 approvals.

Since 2008, there have been ongoing lawsuits and appeals challenging the City's approvals. On March 20, 2009, the Los Angeles County Superior Court denied a petition for writ of mandate seeking to invalidate the City's approvals (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles*, BS 116355, Statement of Decision, pp. 2, 6). This decision was appealed and on September 22, 2010, the Court of Appeal of the State of California, Second Appellate District, upheld the Los Angeles County Superior Court's decision (*La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles*, B217060, Statement of Decision, p. 12). Since the

City's September 2008 approvals were upheld, the Applicant was able to move forward with construction.

Between January and July 2012, the Los Angeles Department of Building and Safety issued demolition and building permits for construction including permits authorizing the demolition of the OSF Building and the construction of a replica of the OSF Building façade in approximately the same position and dimensions of the demolished building. Construction commenced in July 2012 and was substantially completed in September 2014.

After the City's issuance of the demolition and building permits, the demolition and building permits were challenged through the City's administrative appeal process and in court. In October 2014, the Los Angeles County Superior Court issued a final order that any permit issued in violation of Ordinance No. 180,094, establishing the project's (Q) Conditions and "D" Development Conditions, and Los Angeles Municipal Code ("LAMC") Section 12.29 is void under LAMC Section 11.02. (La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles, BS 137262, Final Order, p. 17.) With respect to the OSF Building, the Los Angeles County Superior Court stated that "the City violated the conditions of approval by issuing a demolition permit for the entire OSF building." (Id. p. 18.) On September 9, 2015, the Court of Appeal of the State of California, Second Appellate District upheld the Los Angeles County Superior Court order. (La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles, B259672.) As a result of the Court's order, the Applicant seeks to re-entitle the completed building and public park so that all necessary permits can be considered for issuance by the City. To re-entitle this development, the Applicant is proposing certain modifications to the CRA Approved Project to allow for the development of the Modified Project, which would include the demolition of the OSF Building and construction of a replica of the OSF Building facade in approximately the same position and dimensions of the demolished building.

D. Existing Land Use and Zoning Designations

The project site is located within the Hollywood Community planning area. Prior to the City's September 2008 land use entitlements, the project site was located in two land use designations pursuant to the 1988 Hollywood Community Plan and two zoning designations. These consisted of a Highway Oriented Commercial land use designation and C4-1-SN zoning designation for all properties fronting on Sunset Boulevard, and a High Medium Density Residential land use designation and [Q]R4-1VL zoning designation for all properties fronting along Gordon Street.

The City's September 2008 land use entitlements resulted in new land use and zoning designations on the project site. The project site's current land use and zoning designations are: (1) Regional Center Commercial and (T)(Q)C2-2D-SN for all properties fronting on Sunset Boulevard and two parcels fronting Gordon Street; and (2) High Medium Density Residential and (T)(Q)R4-1VL for the remaining properties fronting along Gordon Street.

E. Current Site Conditions

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Prior to construction of the building and public park, the project site was developed with an approximately 15,252 square-foot existing restaurant use, its associated surface parking lots, and three parcels north of the parking lot were developed with multi-family residential uses containing nine residential units. All of those previously existing uses were demolished starting in 2012.

F. Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the proposed Modified Project is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles.

To further this underlying purpose the following basic project objectives of the Modified Project are:

- To contribute to the revitalization of the Hollywood Community Plan area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses which is consistent with the surrounding Sunset Boulevard corridor;
- 2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
- 3. To promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level;
- 4. To provide a publicly accessible park in a manner that will provide a safe, attractive and well maintained open space environment; and
- 5. To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues.

The following Modified Project additional objectives have also been identified:

- 1. To provide on-site parking in a manner that is consistent with City requirements;
- 2. To provide opportunities for retail and office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;
- 3. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;
- 4. To create a development with a high-quality urban design;
- 5. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;
- 6. To eliminate and prevent the spread of blight and deterioration by providing housing, retail and restaurant uses, and open space within a Citydesignated Redevelopment Area;
- 7. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");
- 8. To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;
- 9. To promote a balanced community by providing a mix of land uses including commercial, residential, office and public open space; and
- 10. To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections and providing bicycle storage facilities on site.

V. Environmental Impacts found in the Initial Study not TO BE significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. City Planning prepared and distributed an Initial Study for the Modified Project on October 15, 2015, included in Appendix A of the Draft Supplemental EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in the Draft Supplemental EIR. Therefore, these issue areas were not examined in detail in the Supplemental EIR. The rationale for the conclusion that no significant impact would occur in each of these issue areas is summarized below, and based on that rationale, and other evidence in the administrative record relating to the Modified Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts. Further, the City

finds and determines that the No Automated Steel Parking Structure Alternative would also not result in any significant impacts in these issue areas.

A. Agricultural Resources

Based upon CRA's (the Lead Agency for the CRA Approved Project) Initial Study Checklist for the CRA Approved Project, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to agricultural resources and no further environmental review was necessary.

Like the CRA Approved Project, the Modified Project is located in a developed, urban area and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The project site is currently developed with commercial and residential uses and does not contain any agricultural uses. Additionally, the project site and immediately surrounding areas are zoned for commercial and multi-family residential use, and is not delineated or designated for use as agricultural land pursuant to the maps prepared for the Farmland Mapping and Monitoring Program. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the development of the Modified Project would not convert any farmland to a non-agricultural use, and no impact would occur. Therefore, the proposed Modified Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to agricultural resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in any significant impacts to agricultural resources and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to agricultural resources.

B. Biological Resources

Based upon CRA's Initial Study Checklist for the CRA Approved Project, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to biological resources and no further environmental review was necessary.

As discussed in the Certified EIR, the project site is located within an urban area and is fully developed. The project site is not expected to contain any species identified as candidate, sensitive, or special status by local or regional plans, policies, or regulation, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS). The project site does not contain any riparian habitat, wetlands or other sensitive natural community and is not within an area designated by an adopted habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan. Furthermore, the existing vegetation on the project site is ornamental. The Certified EIR stated the CRA Approved Project must follow the Migratory Bird Treaty Act (MBTA) (16 USC 703) during development. The Certified EIR for the CRA Approved Project concluded no impact to biological resources would occur and no further analysis was required.

The Modified Project proposes some modifications to the CRA Approved Project but would be located on the same developed, urban infill project site, and therefore potential impacts associated with biological resources would be the same as the CRA Approved Project. Consistent with the CRA Approved Project, development of the Modified Project would be required to comply with the MBTA, and no impact to migratory birds would occur. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, development of the Modified Project would result in no impact to biological resources. Therefore, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to biological resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact to biological resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to biological resources.

- C. Hazards and Hazardous Materials
 - 1. Routine Transport, Use or Disposal of Hazardous Materials
 - a. Description

The Certified EIR concluded the construction of the CRA Approved Project had the potential to result in significant impacts associated with the routine transport, use or disposal of hazardous materials. However, the Certified EIR stated the CRA Approved Project would implement Certified EIR Mitigation Measures MM IV.D-1 and MM IV.D-2, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations and ensures a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead- based paint containing materials (LBPCM) within structures, which would result in a less than significant impact. Thus, the Certified EIR stated the CRA Approved Project would be required to comply with existing regulations applicable to all development projects, and that adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less-than-significant levels.

As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction for the installation and retrofitting of the new automated steel parking structure and interior building renovations. These activities would not involve the demolition of any structures containing asbestos or lead-based paint and, therefore, would not involve the routine transport, use, or disposal of hazardous materials. Nevertheless, the Modified Project would implement Certified EIR Code Required (Regulatory Compliance) Measure MM IV.D-1.1, and Certified EIR Mitigation Measure MM.IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and

regulations, and Certified EIR Code Required (Regulatory Compliance) Measure MM IV.D-1.2, (which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead-based paint containing materials (LBPCM) within structures. Additionally, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-2, which ensures, through implementation of Code-Required Measure MM IV.D-1.1 and Code-Required Measure MM IV.D-1.2, that potential impacts related to the release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less-than-significant levels. Implementation of Certified EIR Code Required Measure MM IV.D-1.1, Certified EIR Code-Required Measure MM IV.D-1.2, Certified EIR Mitigation Measure MM IV.D-1, and Certified EIR Mitigation Measure MM IV.D-2 would ensure impacts are less than significant.

Regarding operations, the Certified EIR concluded operation of the CRA Approved Project would result in a less than significant impact with respect to the release of hazardous materials resulting from the routine transport, use, or disposal of potentially hazardous materials. During operation, project-related activities would not involve the use or storage of potentially hazardous materials and would not have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The limited quantities of hazardous materials (cleaning products) that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations, and impacts would be less than significant.

The Modified Project involves the same uses as the CRA Approved Project (residential and commercial uses), and would not introduce new uses that would involve the transport, use, or disposal of potentially hazardous materials beyond those analyzed in the Certified EIR. Consistent with the CRA Approved Project, the limited quantities of hazardous materials (cleaning products) that would be used in operation of the Modified Project would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations, and impacts would be less than significant.

Therefore, the Modified Project would result in less than significant impacts related to routine transport, use, or disposal of hazardous materials both during construction and operation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to routine transport, use, or disposal of hazardous materials.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to routine transport, use, or disposal of hazardous materials both during construction and operation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to routine transport, use, or disposal of hazardous materials.

Therefore, no further analysis of this issue is required.

b. Mitigation Measures

Certified EIR Mitigation Measure MM IV.D-1: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the release of hazardous materials resulting from the potential release of asbestos containing materials and lead-based paint during construction would be mitigated to less than significant levels. No additional mitigation measures are required.

Certified EIR Mitigation Measure MM IV.D-2: Implementation of the Code-Required Measures IV.D-1.1 and IV.D-1.2, would ensure potential impacts related to the potential release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels.

2. Release of Hazardous Materials into the Environment

a. Description

The Certified EIR concluded that construction of the CRA Approved Project had the potential to result in significant impacts associated with the release of asbestos and lead based paint during demolition, but that such impacts would be reduced to less than significant levels with the implementation of mitigation measures. Furthermore, during the construction phase, the CRA Approved Project was anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. The Certified EIR stated all hazardous materials encountered or used during demolition, grading/excavation, and construction activities would be handled in accordance with all applicable local. State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste. The Certified EIR stated the CRA Approved Project would implement Certified EIR Code-Required (Regulatory Compliance) Measure MM IV.D-1.1, and Certified EIR Mitigation Measure MM IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations, and Certified EIR Code-Required (Regulatory Compliance) Measure MM IV.D-1.2, and Certified EIR Mitigation Measure MM IV.D-1, which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead-based paint containing materials (LBPCM) within structures. Thus, the Certified EIR concluded adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less than significant levels. During operation, the Certified EIR stated cleaning solvents expected to be used would be similar in type and quantity to those currently used on-site. However, due to the size of the CRA Approved Project the storage and use of such materials is anticipated to increase in volume in conjunction with the routine day-to-day operations of the CRA Approved Project. The limited quantities of hazardous materials that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, the CRA Approved Project concluded impacts

related to routine transport, use, and disposal of hazardous materials during operation would be less than significant.

As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction for the installation and retrofitting of the new automated steel parking structure and interior building renovations. These activities would not involve the demolition of any structures containing asbestos or lead-based paint. Nevertheless, the Modified Project would implement Code Required Measure MM IV.D-1.1 and Certified EIR Mitigation Measure MM IV.D-1, which ensure that all asbestos containing materials (ACMs) present in existing on-site structures shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations, and Certified EIR Code Required Measure MM IV.D-1.2 and Certified EIR Mitigation Measure MM IV.D-1, which ensure that a licensed Lead-Based Paint (LBP) Inspector shall be retained to determine the presence of LBP and lead-based paint containing materials (LBPCM) within structures. Additionally, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-2, which ensures, through implementation of Code Required Measure MM IV.D-1.1 and Code-Required Measure MM IV.D-1.2, that potential impacts related to the release of hazardous materials from the routine transport, use, or disposal of potentially hazardous materials would be mitigated to less than significant levels. Implementation of Certified EIR Code Required Measure MM IV.D-1.1, Certified EIR Code Required Measure MM IV.D-1.2, Certified EIR Mitigation Measure MM IV.D-1, and Certified EIR Mitigation Measure MM IV.D-2 would ensure impacts are less than significant.

Operation of the Modified Project would be substantially the same as the CRA Approved Project analyzed in the Certified EIR. The Modified Project contains all of the same uses as the CRA Approved Project (residential and commercial uses) would not involve the use or storage of potentially hazardous materials and would not have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The limited quantities of hazardous materials that would be used during Modified Project operations, such as cleaning products, would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, operation of the Modified Project would not change the Certified EIR's conclusions regarding the release of hazardous materials into the environment and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the release of hazardous materials into the environment.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to the release of hazardous materials into the environment and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the release of hazardous materials into the environment.

Therefore, no further analysis of this issue is required as a result of the Modified Project.

b. Mitigation Measures

See Certified EIR Mitigation Measure MM IV.D-1 and Certified EIR Mitigation Measure MM IV.D-2.

 Emission of Hazardous Emissions or Handle of Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of an Existing or Proposed School

The Certified EIR concluded the project site was not located within one-quarter mile of an existing school and, therefore, impacts associated with the emission of hazardous emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within one-quarter mile of a primary or secondary school and therefore, the Modified Project would result in no impacts involving schools related to the accidental release of potentially hazardous materials. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to emission of hazardous emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would also result in no impacts involving schools related to the accidental release of potentially hazardous materials and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to emission of hazardous emissions or handle of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

4. Site Included on a List of Hazardous Materials Sites

The Certified EIR concluded the project site is not identified on any hazardous materials site databases. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site is not located on a site included on a list of hazardous materials sites. Therefore, the Modified Project would not be located on a site included on a list of hazardous materials site databases and no impacts would occur. Additionally, as discussed in Section IV.D, Hazardous Materials/Risk of Upset of the Certified EIR, based on a Phase I Environmental Site Assessments (ESA) (Geocon Consultants Inc., 2003), and an Updated Phase I ESA, (West Coast Environmental and Engineering, 2005), several properties reportedly located within a ½ mile radius of the project site were listed on federal, State, and local environmental regulatory agency databases. However, the Certified EIR concluded, based on the database results and upon further observations of on-and off-site properties, investigators did not observe physical evidence to suggest that any surrounding properties have the potential to impact the project site for the CRA Approved Project with hazardous waste or materials. As the Modified Project is located on the same project site as the CRA Approved Project these surrounding properties would not have the potential to impact the project site for the

Modified Project. Furthermore, a review of the DTSC's EnviroStor database, was conducted in October 2017. Five properties were identified in the EnviroStor database within a ½ mile radius of the project site. None of these properties were identified in Section IV.D, Hazardous Materials/Risk of Upset of the Certified EIR. Of the five properties, four of the five properties were listed as school investigations and classified as "inactive – withdrawn". The fifth property, Central Los Angeles High School located at Sunset Boulevard and Van Ness Avenue, approximately 1,000 feet from the project site, was listed as a school cleanup and certified in 2002. As such, based on the database, the properties listed would not have the potential to impact the Modified Project with hazardous waste or materials. Thus, consistent with the analysis in the Certified EIR for the CRA Approved Project, no properties listed on federal, State, and local environmental regulatory agency databases would have the potential to impact the Modified Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located on a site included on a list of hazardous materials sites.

Like the Modified Project, no properties listed on federal, State, and local environmental regulatory agency databases would have the potential to impact the No Automated Steel Parking Structure Alternative and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to being located on a site included on a list of hazardous materials sites.

5. Within an Airport Land Use Plan, Two Miles of a Public or Public Use Airport

The Certified EIR concluded the project site was not located within two-miles of an airport and, therefore, impacts associated with being located within two-miles of an airport was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within two-miles of an airport and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located within 2-miles of an airport.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the being located within two-miles of an airport.

6. Within the Vicinity of a Private Airstrip

The Certified EIR concluded the project site was not located within two-miles of a private airstrip and, therefore, impacts associated with being located within two-miles of a private airstrip was not analyzed. The Modified Project is located on the same project site as the CRA Approved Project. Thus, the project site for the Modified Project is not located within

two-miles of a private airstrip and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project being located within two-miles of a private airstrip.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to being located within two-miles of a private airstrip.

7. Interference with an Emergency Response Plan or Emergency Evacuation Plan

a. Description

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to an adopted emergency response plan or emergency evacuation plan. The Certified EIR determined though construction activities may require temporary and/or partial street closures on adjacent roadways due to construction activities and roadway widening improvements, the CRA Approved Project would implement Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2. Certified EIR Mitigation Measure MM IV.D-3.1 ensures the CRA Approved Project shall maintain appropriate fire and police access to the project site during the construction process. Certified EIR Mitigation Measures MM IV.D-3.2 ensures, to the maximum extent feasible, the CRA Approved Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours. Thus, with implementation of mitigation measures, the CRA Approved Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan during construction. The Certified EIR also concluded operation of the CRA Approved Project would have a less than significant impact with respect to an emergency response plan or emergency evacuation plan. The Certified EIR stated the CRA Approved Project would implement Certified EIR Mitigation Measure MM IV.D-5, which ensures the CRA Approved Project applicant prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department, and therefore the CRA Approved Project would result in a less than significant impact.

Compared to the CRA Approved Project, the Modified Project would require minimal additional construction associated with the installation and retrofitting of the new automated steel parking structure and interior building renovations. Thus, the additional construction activities for the Modified Project would not substantially increase the construction activities proposed by the CRA Approved Project and the additional construction activities associated with the Modified Project would not interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan. Nevertheless, the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2. Certified EIR Mitigation Measure MM IV.D-3.1 ensures the Modified Project shall maintain

appropriate fire and police access to the project site during the construction process. Certified EIR Mitigation Measures MM IV.D-3.2 ensures, to the maximum extent feasible, the Modified Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours. Implementation of Certified EIR Mitigation Measure MM IV.D-3.1 and Certified EIR Mitigation Measures MM IV.D-3.2 would ensure impacts are less than significant. During operation, consistent with the CRA Approved Project, the Modified Project would not be expected to alter or interfere with any off-site adopted emergency response plan or emergency evacuation plan. The Modified Project would not alter or change the driveways or vehicular traffic patterns in the project vicinity. Nevertheless the Modified Project would implement Certified EIR Mitigation Measure MM IV.D-5, which ensures the CRA Approved Project applicant prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department, to ensure impacts are less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to interfere with an emergency response plan or emergency evacuation plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to an adopted emergency response plan or emergency evacuation plan and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to interfere with an emergency response plan or emergency evacuation plan.

b. Mitigation Measures

Certified EIR Mitigation Measure MM IV.D-3.1: The Modified Project shall maintain appropriate fire and police access to the project site during the construction process.

Certified EIR Mitigation Measure MM IV.D-3.2: To the maximum extent feasible, the Modified_Project shall schedule all construction-related deliveries and haul trips to occur outside peak traffic hours.

Certified EIR Mitigation Measure MM IV.D-5: The Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

8. Exposure of People or Structures to a Significant Risk, Injury or Death Involving Wildland Fires

The Certified EIR concluded the project site for the CRA Approved Project was not located within proximity to open space, brush or forested properties and was not susceptible to wildland fire hazards. Therefore, the Certified EIR stated no further analysis of the topic was required. The Modified Project is located on the same project site as the CRA

Approved Project. Thus, the project site for the Modified Project is not located proximity to open space, brush or forested properties and is not susceptible to wildland fire hazards. Therefore, the Modified Project would have no potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to expose people or structures to a significant risk, injury or death involving wildland fires.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have no potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to expose people or structures to a significant risk, injury or death involving wildland fires.

- **D.** Hydrology and Water Quality
 - 1. Violation of Any Water Quality Standards or Waste Discharge Requirements

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. However, the Certified EIR stated implementation of the Best Management Practices (BMPs) in the CRA Approved Project site specific Storm Water Pollution Prevention Plan (SWPPP) and compliance with the City's Low Impact Development (LID) Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. The Certified EIR also concluded in Section IV.H. Land Use Planning that the CRA Approved Project would be consistent with the applicable water quality policies of the Regional Water Quality Control Board (RWQCB) and impacts upon water quality would be less than significant. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting of the new automated steel parking structure and interior building renovations. Any construction activity with the potential to create surface water runoff would be subject to the City's LID Ordinance and a site specific SWPPP. Operation of the Modified Project would involve the same uses as the CRA Approved Project analyzed in the Certified EIR (residential dwelling units, office and retail/restaurant uses). As was the case for the CRA Approved Project, wastewater from these uses would be discharged into the sanitary sewer in accordance with all applicable laws and regulations. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the Modified Project's potential to violate any water quality standards or waste discharge requirements.

Like the Modified Project, the No Automated Steel Parking Structure Alternative also would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the potential to violate any water quality standards or waste discharge requirements.

2. Substantially Deplete Groundwater Supplies or Interfere with Groundwater Recharge

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.C, Geology/Soils, that groundwater within the region and beneath the project site is relatively deep below the surface, and its historic high depth is approximately 50 to 55 feet below grade surface. The Certified EIR concluded that construction of the CRA Approved Project during excavation and development of foundation footings would reach a depth of approximately 50 feet below ground surface and would not extend to the groundwater table. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Installation of footings associated with the parking structure would not extend beyond the depth of the existing footings of the vacant 22-story, approximately 250-foot high mixed use building on the project site and thus would not extend into the groundwater table. Therefore, the Modified Project would not interfere with the groundwater table and would not affect groundwater supplies or groundwater recharge. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the depletion of groundwater supplies or interference with groundwater recharge.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in no impact to biological resources and would not interfere with the groundwater table and would not affect groundwater supplies or groundwater recharge and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the depletion of groundwater supplies or interference with groundwater recharge.

3. Substantially Alter the Existing Drainage Pattern of the Site or Area Resulting in Substantial Erosion or Siltation

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR concluded in Section IV.C, Geology/Soils, the CRA Approved Project would not result in substantial soil erosion. The Certified EIR determined that although construction of the CRA Approved Project had the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. The Certified EIR also concluded the potential for soil erosion during the ongoing operation of the CRA Approved Project was relatively low due to the generally level topography of the project site. As compared to the CRA Approved Project, the Modified Project would require minimal additional on-site construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building

renovations. No grading would occur during the additional construction required for the Modified Project and, therefore, the Modified Project's additional construction would not substantially alter the existing drainage pattern of the site or area resulting in substantial erosion or siltation. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, operation of the Modified Project would not have the potential for soil erosion due to the generally level topography of the project site. The Modified Project would not substantially alter the existing drainage pattern of the site or area resulting in substantial erosion or siltation during operation. Therefore, erosion and siltation impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to erosion and siltation.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative erosion and siltation impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to erosion and siltation.

4. Substantially Alter the Existing Drainage Pattern of the Site or Area Resulting in Flooding

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning that the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards. Further, no grading would occur during the additional construction required for the Modified Project and, therefore, the Modified Project's additional construction would not substantially alter the existing drainage pattern of the site or area. Therefore, potential flooding impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to flooding.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative potential flooding impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to flooding.

Therefore, no further analysis of this issue is required.

5. Creation or Contribution of Runoff Exceeding the Existing or Planned Stormwater Drainage Systems

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project and did not directly address the CRA Approved Project's hydrology and water quality impacts during operation. The Certified EIR stated in Section IV.H. Land Use Planning, prior to construction, the CRA Approved Project applicant would be required to obtain a National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit from the RWQCB. In accordance with the RWQCB requirements, the CRA Approved Project applicant would need to file a Notice of Intent and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity. As part of the SWPPP, the CRA Approved Project would be required to implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical. In addition, the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the CRA Approved Project SWPPP and compliance with the City's LID Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Though the Certified EIR did not directly address the CRA Approved Project's hydrology and water quality impacts during operation, the Certified EIR did conclude in Section IV.H. Land Use Planning, that the CRA Approved Project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant. Similar to the CRA Approved Project, during construction of the Modified Project, the Modified Project would implement the BMPs in the SWPPP and comply with the City's LID Ordinance to ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Operation of the Modified Project would include stormwater catch basins and planters consistent with the City's LID Ordinance such that the Modified Project would not change the capacity of retention basins or increase the volume of surface water runoff which would adversely impact the quality of receiving waters. No changes to the current runoff patterns would occur under the Modified Project, and therefore impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to runoff exceeding the existing or planned stormwater drainage systems.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative impacts would remain less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to runoff exceeding the existing or planned stormwater drainage systems.

6. Substantially Degrade Water Quality

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning,

implementation of the BMPs in the CRA Approved Project SWPPP and compliance with the City's LID Ordinance would ensure that the CRA Approved Project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Similar to the CRA Approved Project, during construction of the Modified Project, the Modified Project would implement the BMPs in the SWPPP and comply with the City's LID Ordinance to ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As compared to the CRA Approved Project, the Modified Project would include the same stormwater catch basins and planters consistent with the City's LID Ordinance such that the Modified Project would not change the capacity of retention basins or increase the volume of surface water runoff which would adversely impact the quality of receiving waters. No changes to the current runoff patterns would occur under the Modified Project. Therefore, the Modified Project would not substantially degrade water quality, and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to substantially degrading water quality.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative would not substantially degrade water quality, and impacts would remain less than significant. The No Automated Steel Parking Structure Alternative would also not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to substantially degrading water quality.

7. Place Housing within a 100-year Flood Plain

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100-year or 500-year flood plain. Further, the project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards and the Modified Project would not place housing within a 100-year flood plain. Therefore, no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing housing within a 100-year flood plain.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative, no impact would occur related to place housing within a 100-year flood plain and the No Automated Steel Parking Structure Alternative would not involve new significant

environmental effects or a substantial increase in the severity of previously identified significant effects related to placing housing within a 100-year flood plain.

8. Place Structures within a 100-year Flood Plain

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100-year or 500-year flood plain. The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project is not located within an area subject to flooding hazards. Further, the project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies. Therefore, the Modified Project would not place structures within a 100-year flood plain. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing structures within a 100-year flood plain.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not place structures within a 100-year flood plain and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to placing structures within a 100-year flood plain.

9. Exposure of People or Structures to a Significant Risk of Loss, Inquiry or Death Involving Flooding, as a Result of the Failure of a Levee or Dam

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The project site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100-year or 500-year flood plain. The Modified Project would be constructed on the same project site as the CRA Approved Project analyzed in the Certified EIR. Therefore, consistent with the CRA Approved Project, the Modified Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, and no impact would occur. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, and no impact would occur. the No The No Automated Steel Parking Structure Alternative would also not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam.

10. Inundation by Seiche, Tsunami, or Mudflow

The Certified EIR did not evaluate the issue of hydrology and water quality for the CRA Approved Project. The Certified EIR stated in Section IV.H, Land Use Planning, the project site for the CRA Approved Project is not located within an area subject to flooding hazards. The Modified Project would be constructed on the same project site as the CRA Approved Project analyzed in the Certified EIR. The project site is not located in a Tsunami Hazard Area, and it is located at least 12 miles from the Pacific Ocean and is not near any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the project site. Furthermore, the project site is located within a developed area of Hollywood where little open space exists. Therefore, the Modified Project would have no impact with regard to seiches, tsunamis, or mudflows. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to inundation by seiche, tsunami, or mudflow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have no impact with regard to seiches, tsunamis, or mudflows and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to inundation by seiche, tsunami, or mudflow.

E. Mineral Resources

Based upon CRA's Initial Study Checklist, CRA determined that there was no substantial evidence the CRA Approved Project would cause significant environmental effects to mineral resources and no further environmental review was necessary. The project site is not located on any oil fields and no oil extraction activities are presently conducted on the project site. Further, the Certified EIR stated, that the City has not identified any locally significant mineral resources on the project site that would be of value to the region and the residents of the State. The Certified EIR determined implementation of the CRA Approved Project would not result in a loss of the availability of a known resource and would have no impact on mineral resources.

The Modified Project proposes some modifications to the CRA Approved Project but would be located on the same developed, urban infill project site, where no oil fields or other mineral resource extraction activities exist. Therefore, potential impacts associated

with mineral resources would be the same as for the CRA Approved Project, and no impact would occur.

As a result, consistent with the analysis in the Certified EIR for the CRA Approved Project, development of the Modified Project would not result in a loss of the availability of a known resource and would have no impact on mineral resources. Therefore, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in a loss of the availability of a known resource and would have no impact on mineral resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to mineral resources.

VI. Environmental Impacts analyzed in the Supplemental EIR and determined not to be SIGNIFICANT per Senate Bill (SB) 734

A. Aesthetics (Views/Light & Glare)

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of aesthetics for informational purposes.

The Certified EIR for the CRA Approved Project concluded that impacts to Aesthetics (Views/Light & Glare) would be: less than significant related to scenic vistas; no impact related to scenic resources; less than significant with mitigation related to visual character; less than significant with mitigation related to light and glare; and less than significant for cumulative impacts.

While the Modified Project's aesthetics impacts shall not be considered significant pursuant to SB 743, the Supplemental EIR conservatively identified mitigation measures that would be implemented as part of the Modified Project, which are provided below.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's aesthetic impacts shall also not be considered significant.

2. Mitigation Measures

MM A.1-1: If any street tree removals are required for the Modified Project's additional construction activities, the street trees to be removed shall be replaced on a 2:1 replacement ratio in compliance with the City of Los Angeles Department of Public Works' Bureau of Street Services, Urban Forestry Division's policies.

MM A.1-2: Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

Certified EIR Mitigation Measure MM IV.A-3.1: The proposed park shall be actively operated and maintained for the life of the Modified Project by the Applicant or designated non-profit organization with the experience and ability to maintain the park in accordance with the public health and safety standards employed by the Department of Parks and Recreation.

Certified EIR Mitigation Measure MM IV.A-4.1: The Modified Project shall include low-level directional lighting at ground, podium, and tower levels of the exterior of the proposed structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties, nor is visible from above.

Certified EIR Mitigation Measure MM IV.A-4.2: The Modified Project's façades and windows shall be constructed with non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

3. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Aesthetics (Views/Light & Glare) pursuant to SB 743, mitigation measures have nonetheless been conservatively incorporated.

4. Rationale for Finding

As discussed above, subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's aesthetic impacts shall also not be considered significant.

Therefore, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Aesthetics (Views/Light & Glare). However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measures.

5. Reference

For a complete discussion of Aesthetics see Sections IV.A.1 Aesthetics (Views/Light and Glare) and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Aesthetics (Shade/Shadow)

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's aesthetic impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of aesthetics for informational purposes.

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to shade and shadow upon nearby residential properties during the summer months and cumulatively. During the winter months, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties. Compared to the CRA Approved Project, the summer and winter solstice shadows created by the Modified Project would fall entirely within the previous shadow pattern projected for the CRA Approved Project analyzed in the Certified EIR. As such, the Modified Project would not increase the severity of the previously disclosed significant and unavoidable shade and shadow impact identified in the Certified EIR for the CRA Approved Project.

Pursuant to SB 743 and the provisions set forth by CEQA § 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment. Thus, the Modified Project would result in less than significant shade and shadow impacts upon nearby residential properties pursuant to SB 743. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to shade and shadow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's shade and shadow impacts shall also not be considered significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to shade and shadow.

a. Cumulative Shade/Shadow Impacts

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project in combination with the related projects identified in the Certified EIR would result in less than significant cumulative shade and shadow impacts. The related projects list was updated for the Modified Project and the nearest related project. Related Project 46. located at 5901 Sunset Boulevard immediately east of the project site, is a 15-story mixeduse building approximately 240 feet above grade and is the only related project relevant to the cumulative shade/shadow analysis. The combined shadows from the Modified Project and Related Project 46, could potentially result in cumulatively significant shade and shadow impacts during the winter months on the multi-family residential uses to the north of the Modified Project. However, as discussed above, pursuant to SB 743 and the provisions set forth by CEQA § 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's aesthetic impacts shall not be considered significant impacts on the environment. Therefore, the Modified Project would not add any incremental contribution to a cumulatively significant impact with respect to shade and shadow, and the Modified Project's impacts would not be cumulatively considerable. (See CEQA Guidelines §§ 15130, 15064(h).) Additionally, Related Project 46 is classified as an employment center project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. Thus. Related Project 46's aesthetic impacts shall also not be considered significant impacts on the environment and, therefore, would not add any incremental contribution to a cumulatively significant impact with respect to shade and shadow. Therefore, the Modified Project's cumulative shade and shadow impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative shade and shadow.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's cumulative shade and shadow impacts shall also not be considered significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative shade and shadow.

2. Reference

For a complete discussion of Aesthetics Shade/Shadow see Section IV.A.2 Aesthetics Shade/Shadow of the Draft Supplemental EIR.

C. Parking

1. Description

Subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's parking impacts shall not be considered significant. Nevertheless, the Supplemental EIR provided an analysis of parking for informational purposes.

The Certified EIR for the CRA Approved Project concluded that impacts to Parking would be less than significant with mitigation for both construction and operation and cumulatively less than significant.

Regarding public parking the Certified EIR did not analyze public parking impacts. As discussed in Section IV.K.1 Traffic / Transportation of the Draft Supplemental EIR, Mitigation Measures K.1-1 and K.1-2 would be implemented as part of the Modified Project to reduce the significant traffic impacts at the Gower Street and Sunset Boulevard intersection during the P.M. peak hour and the Bronson Avenue and Sunset Boulevard intersection during the A.M. peak hour. With implementation of the Mitigation Measures K.1-1 and K.1-2 up to 7 public parking spaces would be removed. However, the Modified Project would set aside up to 7 spaces within the parking structure for public parking onsite, which would be provided to the public for one hour free. Thus, the Modified Project would not result in a deficiency in public parking availability in the project site vicinity and impacts related to public parking would be less than significant. As such, the Modified Project's parking impacts shall not be considered significant impacts on the environment. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to parking.

While the Modified Project's parking impacts shall not be considered significant pursuant to SB 743, the Supplemental EIR conservatively identified mitigation measures that would be implemented as part of the Modified Project, which are provided below.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's parking impacts shall also not be considered significant.

a. Cumulative

The Certified EIR concluded cumulative parking impacts would be less than significant. For the Modified Project, parking impacts would not be considered significant impacts on the environment, and the Modified Project's parking impacts would not be cumulatively considerable. Accordingly, consistent with the analysis in the Certified EIR for the CRA Approved Project, cumulative parking impacts would be less than significant, and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative parking impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative parking impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative parking impacts.

2. Mitigation Measure

Certified EIR Mitigation Measure MM IV.K.2-1: In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

3. Findings

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Parking pursuant to SB 743, mitigation measures have nonetheless been conservatively incorporated.

4. Rationale for Finding

As discussed above, subsequent to the certification of the Certified EIR, SB 743 was enacted which amended CEQA Section 21099 (d)(1) to state that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. Accordingly, because the Modified Project is a mixed-use residential project on an infill site within a transit priority area, the Modified Project's parking impacts shall not be considered significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative is a mixed-use residential project on an infill site within a transit priority area and accordingly, the No Automated Steel Parking Structure Alternative's parking impacts shall also not be considered significant.

Therefore, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant

environmental effects or a substantial increase in the severity of previously identified significant effects related to Parking. However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure.

5. Reference

For a complete discussion of Parking see Sections IV.K.2 Parking and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

VII. Environmental Impacts analyzed in the Supplemental EIR and determined to have no impact or be less than significant PRIOR to Mitigation

Based on the analysis in the Supplemental EIR and other evidence in the administrative record relating to the Modified Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed.

Further, based on the analysis in the Supplemental EIR and other evidence in the administrative record, the City finds and determined that the following environmental impact categories will also not result in any significant impacts and that no mitigation measures are needed for the No Automated Steel Parking Structure Alternative.

- **A.** Air Quality (Consistency with Applicable Plans and Policies, Operations, Cumulative)
 - 1. Description
 - **a.** Consistency with Applicable Plans and Policies
 - (1) Consistency with the Final 2016 AQMP

The Certified EIR concluded that because the CRA Approved Project would be consistent with the regional population forecasts for the City of Los Angeles and the Hollywood area, it would not jeopardize attainment of State and national ambient air quality standards in the South Coast Air Basin (Basin) and the Los Angeles County portion of the Basin. In addition, the Certified EIR determined the increase in population growth associated with the CRA Approved Project would produce vehicle miles traveled/population ratio that was consistent with the forecasts in the 2003 Air Quality Management Plan (AQMP). Accordingly, the Certified EIR concluded the CRA Approved Project would be consistent with the South Coast Air Quality Management Plan District's (SCAQMD) 2003 AQMP growth assumptions and impacts would be less than significant.

The Draft Supplemental EIR evaluated the Modified Project's consistency with the adopted Final 2016 AQMP, and found that the Modified Project would not result in construction or operational air quality emissions that would exceed any of the SCAQMD thresholds of significance at the project level. Furthermore, the Modified Project would be required to comply with applicable SCAQMD rules and regulations for new or modified

sources. By meeting SCAQMD rules and regulations, Modified Project construction activities would be consistent with the goals and objectives of the Final 2016 AQMP to improve air quality in the Basin. Thus, the Modified Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

In addition, projects that are consistent with the projections of employment, population and housing forecasts identified by Southern California Association of Governments (SCAG) are considered to be consistent with the Final 2016 AQMP. For purposes of consistency with the Final 2016 AQMP, the Modified Project is consistent with the growth projections contained in the 2016-2040 RTP/SCS. The Modified Project would not exceed the population and housing projections of the 2016-2040 RTP/SCS for the Los Angeles subregion and would not jeopardize attainment of the air quality conditions projected in the Final 2016 AQMP. Accordingly, through evaluation of the Modified Project for consistency with regional plans and the regional Final 2016 AQMP, impacts with respect to regional plans and AQMP consistency would be less than significant.

Therefore, the Modified Project's impacts with respect to consistency with the applicable AQMP would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the applicable AQMP.

Like the Modified Project, the No Automated Steel Parking Structure Alternative impacts with respect to consistency with the applicable AQMP would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the applicable AQMP.

(2) Consistency with General Plan Air Quality Element

The City's Air Quality Element sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. While the Certified EIR did not analyze the CRA Approved Project's consistency with the City's General Plan Air Quality Element, a detailed analysis of the consistency of the Modified Project with relevant policies in the City's General Plan Air Quality Element is presented in Draft Supplemental EIR Section IV.B, Air Quality, Table IV.B-8, Project Consistency with Applicable Policies of the General Plan Air Quality Element. As shown therein, the Modified Project would be consistent with the goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, the Modified Project's impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with applicable plans and policies.

Like the Modified Project, the No Automated Steel Parking Structure Alternative impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with applicable plans and policies.

b. Operation

(1) Regional Operational Air Quality Impacts

The Certified EIR analyzed the daily operational emissions from the CRA Approved Project and determined that operational emissions would not exceed the established SCAQMD threshold levels for VOC, NO_x , CO, SO_x , PM_{10} , and $PM_{2.5}$ during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the CRA Approved Project were found to be less than significant.

The Draft Supplemental EIR analyzed the daily operation emissions from the Modified Project and determined that the estimated gross daily regional operational emissions associated with the Modified Project would not exceed the established SCAQMD threshold levels for ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions.

Like the Modified Project, impacts associated with regional operational emissions from the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions.

(2) Local Operational Air Quality Impacts

The Certified EIR analyzed daily operational emissions generated by the CRA Approved Project against SCAQMD's Localized Significance Thresholds and on-site emissions generated by the CRA Approved Project during operation would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5} at a receptor distance of 25 meters. Thus, the on-site operational emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 25 meters. The Certified EIR concluded that localized operational impacts of the CRA Approved Project would have been considered less than significant.

To determine whether operational emissions would result in localized air quality impacts, the operational emissions of the Modified Project have been analyzed against the SCAQMD's LSTs for a receptor location of 25 meters. On-site operational emissions generated by the Modified Project would not exceed the established SCAQMD localized

thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Thus, the localized air quality impacts resulting from operational emissions associated with the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions for NO_x, CO, PM₁₀, and PM_{2.5}.

Like the Modified Project, localized air quality impacts resulting from operational emissions associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational emissions for NO_x, CO, PM₁₀, and PM₂.

(3) Localized CO Emissions

At the time the Certified EIR was written, the Basin was a designated national non-attainment area for CO concentrations. Therefore, the Certified EIR analyzed localized CO impacts for the CRA Approved Project. The Certified EIR concluded that future CO concentrations near the study intersections would not exceed national or State ambient air quality standards. Therefore, the Certified EIR determined CO hotspots would not occur near these intersections in the future with operation of the CRA Approved Project. Therefore, the Certified EIR concluded impacts related to local CO concentrations at these intersections would have been less than significant.

For the Modified Project, the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Ambient CO levels in the Source Receptor Area (SRA) 1 are substantially below the federal and state standards. Because the Basin remains in attainment and existing congested intersections at the four heaviest congested intersections (exceeding 100,000 vehicles per day) do not exceed state thresholds, CO concentrations have been demonstrated to be less than significant under extreme conditions. As such, no further analysis for CO hotspots is warranted for the Modified Project. Therefore, the Modified Project's impacts associated with localized CO operational emissions would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized CO operational emissions.

Like the Modified Project, impacts associated with localized CO operational emissions would be less than significant for the No Automated Steel Parking Structure Alternative and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized CO operational emissions.

(4) Odors

The Certified EIR did not address potential impact associated with odors.

The Modified Project does not include any of the uses identified by the SCAQMD as being associated with odors. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, no construction activities or materials that would be used during the Modified Project's additional construction activities would create a significant level of objectionable odors.

With respect to long-term project operations, the Modified Project would not create objectionable odors affecting a substantial number of people. Odors from garbage shoots and refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures pursuant to the applicable regulations of LAMC Section 12.21.19, which provides building specifications for trash chutes and recycling rooms in multi-family dwellings. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to LAMC Section 91.6302.3, which requires mechanical exhaust ventilation systems capable of effectively removing cooking odors, smoke, steam, grease and vapors at or above cooking equipment in dwellings, and SCAQMD Rule 1138, which requires the installation of adequate ventilation systems and odor-reducing equipment for restaurants. Therefore, a less than significant impact would occur with respect to the creation of objectionable odors.

Like the Modified Project, a less than significant impact would occur with respect to the creation of objectionable odors for the No Automated Steel Parking Structure Alternative.

c. Cumulative

(1) Construction

The Certified EIR concluded that the construction emissions associated with the CRA Approved Project would not exceed the SCAQMD's thresholds of significance. Consequently, the Certified EIR concluded that the contribution of daily construction emissions by the CRA Approved Project would have not been cumulatively considerable, and that construction emission impacts would have been less than significant. Construction emissions associated with the Modified Project's construction activities, which includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building operation, would not exceed the SCAQMD's thresholds of significance. Therefore, the Modified Project's cumulative construction emissions would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to construction emissions.

Like the Modified Project, cumulative construction air quality impacts of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously

identified significant effects related to cumulative impacts relevant to construction emissions.

(2) Operation

Because the CRA Approved Project would not exceed the SCAQMD's thresholds of significance for the criteria pollutants, the Certified EIR concluded that the CRA Approved Project's operational emissions would not be cumulatively considerable. The CRA Approved Project would have been consistent with the growth forecasts for the Hollywood area of the City of Los Angeles, and would have been consistent with the 2003 AQMP. Thus, the cumulative impact of the CRA Approved Project for operational emissions would have been less than significant. Operational emissions associated with the Modified Project would not exceed the SCAQMD's thresholds of significance. In addition, the Modified Project would be consistent with the growth forecasts for the Hollywood area of the City of Los Angeles, and would be consistent with the Final 2016 AQMP consequently, the contribution of daily operational emissions by the Modified Project would not be cumulatively considerable. Therefore, cumulative impacts operational air quality impacts of the Modified Project would be considered less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to daily operational emissions.

Like the Modified Project, cumulative impacts operational air quality impacts of the No Automated Steel Parking Structure Alternative would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to daily operational emissions.

2. Reference

For a complete discussion of Air Quality (Consistency with Applicable Plans and Policies, Operation, and Cumulative) see Sections IV.B Air Quality and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Geology/Soils

1. Description

a. Seismic Hazards (Fault Rupture)

The Certified EIR for the CRA Approved Project stated that the project site is located in the seismically active region of Southern California. The Certified EIR stated no active surface fault traces identified by the State as delineated on the 1999 Alquist-Priolo Earthquake Fault Zoning Map, were known to be present beneath the project site. The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault Zone located approximately 2,500 feet north-northwest of the project site. The Certified EIR

concluded the CRA Approved Project would result in less than significant impacts related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The Modified Project would be located on the same project site as the CRA Approved Project. Therefore, similar to the CRA Approved Project, the Modified Project is located in the seismically active region of Southern California. Modern, well-constructed buildings are designed to resist the rupture of a known earthquake fault through the use of shear walls and reinforcements. The Modified Project, including the additional construction of the new automated steel parking structure, would be consistent with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Thus, the additional construction and operation of the new automated steel parking structure would not impact this analysis related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault Zone located approximately 2,500 feet north-northwest of the project site. The project site is not located within a designated Alguist-Priolo Earthquake Fault Zone or a fault rupture study zone. No known active faults trend through the project site. Furthermore, the closest active fault to the site capable of surface rupture is the Hollywood Fault, which lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to surface rupture. Since the Certified EIR for the CRA Approved Project, an Alguist-Priolo special study zone was established for the active Hollywood Fault. The closest distance of the Hollywood Fault special study zone to the project site is approximately 700 feet north of the project site's northern property line and the closest mapped active fault trace is approximately 1,200 feet north of the project site's northern property line. The Modified Project's Geotechnical Report concluded that the project site is not located within a special study zone, is not subject to fault rupture, and the issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map showing the Hollywood Fault being located 1,200 feet north of the project site does not impact the development of the Modified Project or modify any recommendations, analysis, or conclusions in the CRA Approved Project's Geotechnical Report and associated addenda.

Furthermore, the Hollywood Fault lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to surface rupture. Thus, the possibility of surface fault rupture affecting the project site would be considered remote. Therefore, consistent with the CRA Approved Project, development of the Modified Project would not expose people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site or exacerbate environmental conditions related to the potential rupture of a known earthquake fault and impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

Like the Modified Project, development of the No Automated Steel Parking Structure Alternative would not expose people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site or exacerbate environmental conditions related to the potential rupture of a known earthquake fault and impacts would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving the rupture of a known earthquake fault.

b. Seismic-Induced Settlement and Liquefaction

The Certified EIR stated, soils on the project site would not be susceptible to liquefaction. The Certified EIR also determined the project site is not within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peat oxidation or hydrocompaction. Therefore, the Certified EIR concluded the CRA Approved Project would have less than significant impacts with respect to seismic induced settlement and liquefaction.

The Modified Project is located on the same project site as the CRA Approved Project and would not expose people or structures to potential substantial adverse effects. including the risk of loss, injury, or death involving seismic-induced ground failure associated with settlement and/or liquefaction. Though the project site is located in a liquefiable area, the CRA Approved Project's Geotechnical Report concluded based on site conditions, data, and investigations, the soils on the project site would not be susceptible to liquefaction and the Modified Project's Geotechnical Report confirmed that issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map did not impact the Modified Project or modify any recommendations, analysis, or conclusions in the CRA Approved Project's Geotechnical Report and associated addenda. As stated in the CRA Approved Project's Geotechnical Report liquefaction generally occurs in saturated, loose to medium dense, granular soils and in saturated, soft to moderately firm slits as a result of strong ground shaking. The soils beneath the groundwater level at the project site are generally fine grained and are firm to stiff. Additionally, the CRA Approved Project's Geotechnical Report explained that the groundwater at the site is at a depth greater than 49 feet bgs and that the project site is not within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peat oxidation or hydrocompaction. Therefore, because the Modified Project is located on the same project site as the CRA Approved Project, and the recommendations, analysis, and conclusions in the CRA Approved Project's Geotechnical Report are still applicable to the project site, the Modified Project would also not be susceptible to liquefaction. Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, the Modified Project's impacts associated with liquefaction and seismic-induced settlement would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to seismic induced settlement and liquefaction.

Like the Modified Project, impacts associated with liquefaction and seismic-induced settlement for the No Automated Steel Parking Structure Alternative would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to seismic induced settlement and liquefaction.

c. Landslides

The Certified EIR concluded that the CRA Approved Project would result in less than significant impacts with respect to landslides. The project site is relatively level and ranges from elevation 370 to 360 feet above msl (from north to south). The project site is not located within a City-designated landslide area. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, due to the relatively flat topography of the project site and surrounding area, there is no potential for impacts associated with landslides to occur for the Modified Project. Like the Modified Project, due to the relatively flat topography of the project site and surrounding area, there is no potential for impacts associated with landslides to occur for the No Automated Steel Parking Structure Alternative.

d. Septic Tanks or Alternative Waste Water Disposal Systems

The Certified EIR did not evaluate septic tanks or alternative waste water disposal systems. The project site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary for the Modified Project, nor are they proposed. Therefore, no impact would occur. Like the Modified Project, no septic tanks or alternative disposal systems are necessary or proposed for the No Automated Steel Parking Structure Alternative and no impact would occur.

e. Cumulative Geology and Soils Impacts

The Certified EIR stated geotechnical impacts related to future development in the City of Los Angeles would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The Certified EIR explained these impacts would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Thus, while cumulative development in the project area would increase the overall population for exposure to seismic hazards, adherence to applicable State and Federal regulations, buildings codes and sound engineering practices, geologic hazards could be reduced to less than significant levels. Additionally, the Certified EIR determined the development of the related projects and the CRA Approved Project would be subject to uniform site development and construction review standards that are designed to protect public safety. Therefore, the Certified EIR concluded cumulative geotechnical impacts would be less than significant.

Similar to the CRA Approved Project, for the Modified Project, cumulative development in the area would increase the overall population for exposure to seismic hazards by

increasing the number of people potentially exposed. However, with adherence to applicable State and Federal regulations, buildings codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, similar to the CRA Approved Project and its related projects, development of each of the related projects and the Modified Project would be subject to uniform site development and construction review standards that are designed to protect public safety. Thus, consistent with the analysis in the Certified EIR, the Modified Project and the related projects' cumulative geotechnical impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant cumulative environmental effects or a substantial increase in the severity of previously identified cumulative effects related to geology and soils.

Like the Modified Project, the No Automated Steel Parking Structure and the related projects' cumulative geotechnical impacts would be less than significant and would not involve new significant cumulative environmental effects or a substantial increase in the severity of previously identified cumulative effects related to geology and soils.

2. Reference

For a complete discussion of Geology and Soils see Sections IV.C Geology and Soils and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Greenhouse Gas Emissions

1. Description

The Certified EIR preceded the adoption of the 2010 CEQA amendments requiring the consideration of a project's greenhouse gas (GHG) emissions and their effect on global climate change in CEQA documents. For purposes of providing a comparative analysis of the Modified Project's GHG emissions, the GHG analysis included an assessment of the CRA Approved Project.

The CRA Approved Project exhibits several characteristics that are inherently consistent with the green building policies and practices that contribute to a reduction in GHG emissions and thus would have been consistent with these policies had they been applicable to the CRA Approved Project. For example, the CRA Approved Project is a mixed-use, high-density residential/commercial redevelopment project located in a urbanized portion of the Hollywood area near mass transit and a broad mix of land uses. Therefore, the CRA Approved Project would be consistent with plans, programs, and regulations that reduce GHG emissions with respect to reducing mobile source emissions associated with trip generation.

The Modified Project is located on the same project site as the CRA Approved Project. Thus, similar to the CRA Approved Project, the Modified Project would be consistent with plans, programs, and regulations that reduce GHG emissions with respect to reducing mobile source emissions associated with trip generation.

In addition, both the CRA Approved Project and the Modified Project would be consistent with applicable policies and regulations that have been adopted for the purpose of meeting the State's goals to reduce statewide GHG emissions in the future. The CRA Approved Project and the Modified Project's consistency with applicable policies and regulations is summarized below.

- Regarding the AB 32 Scoping Plan policies, both the CRA Approved Project and the Modified Project are substantially consistent with the applicable GHG reduction policies for new development. Due to the enhanced building efficiency associated with updates to Title 24 building energy efficiency standards, and the adoption of the LA Green Building Code, GHG emissions under the Modified Project would be less than those generated under the CRA Approved Project.
- Regarding Executive Orders S-3-05 and B-30-15, as the CRA Approved Project and the Modified Project are consistent with the plans, policies and regulations enacted by the State, regional and local entities in furtherance of GHG reduction efforts, the CRA Approved Project and the Modified Project would not conflict with the states implementation of Executive Orders S-3-05 and B-30-15.
- Regarding SB 375 and Consistency with the 2016-2040 RTP/SCS both the CRA Approved Project and the Modified Project would be consistent with the strategies outlined in the 2016-2040 RTP/SCS which encourage infill and mixed-use developments in high quality transit areas.
- Regarding the L.A. Green Building Code the Modified Project would be consistent with the applicable provisions of the LA Green Building Code, would provide additional support for alternative fuel vehicles, would be consistent with applicable requirements related to source reduction and recycling efforts to minimize the projects solid waste disposal needs, and would provide on-site bicycle storage to facilitate and encourage alternative modes of transit. Specifically, to encourage the use of electric and hybrid-electric vehicles by the Modified Project's residents and visitors the Modified Project would implement PDF D-1 which provides that at least twenty (20)% of the Code required parking stalls will be constructed to accommodate the future placement of facilities for the recharging of electric vehicles (electric vehicle supply equipment (EVSE)) with five (5)% of these stalls being equipped with the electrical vehicle charging stations.

Therefore, both the CRA Approved Project and the Modified Project would be consistent with applicable policies and regulations that have been adopted for the purpose of meeting the State's goals to reduce statewide GHG emissions in the future. In addition, the Modified Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets. Further, the Modified Project's GHG impacts would be less than the CRA Approved Project by approximately 847 MTCO₂e/Yr. The Modified Project would be substantially consistent with the goals and policies set

forth in AB 32, SCAG's 2016-2040 SCS/RTP, SB 375, and applicable provisions of the City's Green Building Code, which are intended to reduce GHG emissions associated with new development. Thus, the Modified Project's GHG impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG impacts that would have resulted under the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's GHG impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG.

Regarding cumulative impacts, given the Modified Project's consistency with State, regional, and City GHG emissions reduction goals and objectives, it would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Similarly, related projects would also be subject to these emissions reduction goals and objectives. Therefore, per CEQA Guidelines Section 15064(h)(3), the Modified Project's cumulative impacts with respect to GHG emissions would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG emissions that would have otherwise resulted under the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts with respect to GHG emissions would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of GHG emissions.

2. Project Design Feature

The following Project Design Feature is relevant to GHG emissions:

PDF D-1: To encourage carpooling and the use of electric vehicles by Modified Project residents and visitors, at least 20 percent of the Code required parking spaces shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicle (electric vehicle supply equipment (EVSE)) with five (5) percent of these stalls being equipped with the electrical vehicle charging stations. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated electric vehicle charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, the required number of spaces would be rounded up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

3. Reference

For a complete discussion of Greenhouse Gas Emissions see Sections IV.D Greenhouse Gas Emissions and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Cultural Resources

1. Description

a. Historic Resources

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project would have no impact on historic resources as none of the buildings on the project site are classified as a historic resource pursuant to CEQA. The Certified EIR in Section IV.E Historic Resources explained that the CRA Approved Project's applicant was exploring options to retain and restore the exterior façade and various interior treatments of the OSF Building or alternatively would seek other methods that would not require retention and/or restoration but would memorialize the social significance of this building as it relates to the development of the Hollywood area.

Compared to the CRA Approved Project, instead of possibly retaining and incorporating the OSF Building into the architecture of the CRA Approved Project, the Modified Project would demolish the OSF Building and would create a replica of its façade in approximately the same position and dimensions of the demolished OSF Building. Though the Modified Project would not retain or restore the OSF Building, since the Certified EIR's analysis determined the OSF Building was not historically significant, the Modified Project would have no impact upon historic resources. The improvements proposed under the Modified Project, which include a new automated steel parking structure and interior building renovations do not impact this analysis. As such, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would not significantly impact any historic or cultural resource and no mitigation measures are required. Therefore, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not significantly impact any historic or cultural resource and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources.

b. Selma-LaBaig Historic District

As concluded in the Certified EIR, the project site is not adjacent to the Selma – LaBaig Historic District, nor is it on the same street as the Historic District. Because the immediate setting of the Historic District would not be affected by the CRA Approved Project and the general setting of the area would not dramatically change, the Certified EIR determined the CRA Approved Project would have no impact on the Selma-LaBaig Historic District.

The Modified Project is located on the same project site as the CRA Approved Project and there has been no change to the boundaries of the Selma – LaBaig Historic District. Therefore, similar to the CRA Approved Project, as the project site is not adjacent to nor across the street from the Selma - LaBaig Historic District, the immediate setting of the Historic District would not be directly affected by the Modified Project. In addition, similar to the CRA Approved Project, the general setting of the area also would not dramatically change with the Modified Project. The Modified Project would not directly affect the setting of the Selma-LaBaig Historic District due to two factors: the distance and intervening built environment between the project site and the Historic District, and the fact that the improvements proposed under the Modified Project would not be out of character for the existing setting of high-rise developments on Sunset Boulevard. Therefore, the buildings within the Historic District would continue to be considered eligible for listing in the National Register. As such, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project will have no impact on the historic resources in the vicinity of the project site. Therefore, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources in the vicinity of the project site.

Like the Modified Project, the No Automated Steel Parking Structure Alternative will have no impact on the historic resources in the vicinity of the project site and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to historic resources in the vicinity of the project site.

c. Archeological Resources, Paleontological Resources, Human Remains, and Tribal Resources

The Certified EIR did not analyze the CRA Approved Project's potential impacts upon archeological, paleontological, human remains, or tribal resources. In Section V. General Impact Categories of the Certified EIR for the CRA Approved Project, the Certified EIR stated discovery of any archaeological resources would be found during earthwork activities. Though no archaeological sites were known to exist beneath the project site, the Certified EIR concluded potential impacts associated with the accidental discovery of unknown archaeological or paleontological resources would be mitigated to a less than significant level by implementing standard City mitigation measure during the earthwork and excavation phase. The Certified EIR did not provide conclusions specific to human remains or tribal resources.

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square foot public park. Compared to the CRA Approved Project, the Modified Project includes minimal additional construction associated with the automated steel parking structure and interior building renovations. As discussed in Section IV. C, Geology and Soils of the Draft Supplemental EIR, installation of the automated steel parking structure would not extend below the areas of prior excavations and thus the Modified Project's additional construction activities will present no potential to impact archaeological resources, paleontological resources, human remains, or tribal resources. In addition, in compliance with AB 52, the City of Los Angeles (lead agency)

distributed AB 52 tribal consultation notices related to the Modified Project to tribes within the greater Los Angeles and Southern California region. No tribes on the NAHC tribal consultation list responded to the AB 52 tribal consultation notices. Therefore, because the Modified Project's minimal additional construction would not extend below the areas of prior excavations, the project site is not known to be associated with archaeological sites, and no tribes on the NAHC tribal consultation list have requested consultation, the probability for the discovery of an unknown site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. As such, the Modified Project's additional construction activities would have no impact upon archaeological resources, paleontological resources, human remains, or tribal resources.

Furthermore, similar to the CRA Approved Project, the Modified Project would implement the standard City mitigation measure as Regulatory Compliance Measure CM E-1, which ensures that Modified Project development will be halted if any archaeological or paleontological materials are encountered, a professional archaeologist or paleontologist will be secured to assess the resources and evaluate the impact, and any required archaeological or paleontological surveys, studies or reports shall be submitted to the UCLA Archaeological Information Center. Regulatory Compliance Measure CM E-1 would ensure that the Modified Project's impacts to archaeological resources, paleontological resources, and tribal resources would be less than significant. Additionally, the Modified Project would comply with Section 15064.5(d) of the CEQA Guidelines, Health and Safety Code Section 7050.5, and California Public Resources Code Section 5097.9, which address treatment of human remains in the event of accidental discovery, to ensure impacts to human remains would be less than significant. Therefore, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to archaeological resources, paleontological resources, human remains or tribal resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have a less than significant impact upon archaeological resources, paleontological resources, human remains, or tribal resources and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to archaeological resources, paleontological resources, human remains or tribal resources.

d. Cumulative

The Certified EIR for the CRA Approved Project concluded the CRA Approved Project would result in less than significant cumulative impacts to cultural resources. Impacts related to historic resources would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. No historical resources were found on the project site and the project site would continue to be physically and visually separated from the Selma – LaBaig Historic District. In addition, there are no related projects between the project site and the Selma – LaBaig Historic District. Therefore, the Modified Project would have no impact upon historical resources, and the Modified

Project in combination with the related projects would not have the potential to impact the Selma – LaBaig Historic District.

Furthermore, impacts to archeological resources, paleontological resources, human remains, or tribal resources tend to be site specific and are assessed on a site-by-site basis. Similar to the Modified Project, each of the related projects would be subject to the CEQA review process to identify and assess the potential for discovery of archaeological resources, paleontological resources, human remains, and tribal resources within the respective area of impact. Related projects would also be required to initiate the AB 52 tribal consultation process with local tribal representatives to assess the potential likelihood of tribal resources in a given area as part of the CEQA review. Similar to the Modified Project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. As such, impacts related to archaeological resources. paleontological resources, human remains, and tribal resources would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Thus, cumulative impacts associated with the accidental discovery of archaeological resources, paleontological resources, human remains, or tribal resources would be reduced to less than significant levels with the incorporation of standard city measures. Therefore, the Modified Project and the related projects' cumulative archaeological resources, paleontological resources, human remains, and tribal resources impacts would be less than significant. Accordingly, consistent with the analysis in the Certified EIR for the CRA Approved Project, cumulative cultural resources impacts would be less than significant, and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative cultural resources impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative cultural resources impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative cultural resources impacts.

2. Reference

For a complete discussion of Cultural Resources see Sections IV.E Cultural Resources and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

E. Noise

1. Description

a. Operational Traffic Noise

The Certified EIR concluded the CRA Approved Project would result in a less-thansignificant noise impact related to increased traffic volumes. The Modified Project would result in a slight reduction to the CRA Approved Project's residential units and commercial floor area for retail and office spaces which, in turn, would alter the number of generated vehicle trips and traffic volumes that were analyzed in the Certified EIR. Thus, locations in the vicinity of the project site could experience slight changes in noise levels between the CRA Approved Project's operational traffic noise levels and the Modified Project's operational traffic noise levels. The Modified Project would increase local noise levels by a maximum of 0.1 dBA CNEL at all roadway segments with the exception of Gordon Street north of Sunset Boulevard, which would have an increase of 1.3 dBA. This increase would be below the 3 dBA significance threshold. Therefore, these increased noise levels from the Modified Project, consistent with the analysis in the Certified EIR for the CRA Approved Project, would not expose persons to or generation of noise levels in excess of established standards or result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity. As such, the Modified Project would result in a less than significant impact related to operational traffic noise. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to operational traffic noise.

- **b.** Cumulative Operational Noise Impacts
 - (1) HVAC Equipment Noise

The Certified EIR did not evaluate cumulative operational noise impacts from HVAC Equipment.

The Modified Project's operational noise impacts associated with the HVAC equipment would be less than significant due to noise attenuation and required compliance with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. The related projects would also be required to comply with the regulations under Section 112.02 of the LAMC. Further, like the Modified Project the related projects would also be required to comply with the existing Noise Ordinance (Ordinance No. 144,331), which prohibits unnecessary, excessive, and annoying noise. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis for HVAC Equipment Noise focused on the nearest related project. The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative operational noise impacts from HVAC equipment to 1527 - 1533 3/4 Bronson Street (Sensitive Receptor No. 9). The Modified Project's HVAC equipment would not increase existing ambient noise levels at the nearest sensitive receptors by 3 dBA or more. For Related Project 46, the HVAC mechanical equipment would be located at the roof level, approximately 15 stories above grade level. At this distance to 1527 - 1533 3/4 Bronson Street (Sensitive Receptor No. 9), the HVAC equipment noise would be imperceptible. Thus, the cumulative HVAC equipment noise from the Modified Project and Related Project 46, located at 5901 Sunset Boulevard, would not increase existing ambient noise levels by 3 dBA or more. Additionally, for the other related projects, there are intervening structures between the Modified Project and the related projects. Thus, the resulting stationary noise levels from the Modified Project and the related projects at

nearby land uses would not increase existing ambient noise levels. Therefore, cumulative impacts from HVAC equipment noise would be less than significant.

Like the Modified Project, cumulative impacts from HVAC equipment noise would be less than significant for the No Automated Steel Parking Structure Alternative.

(2) Parking Structure Noise

The Certified EIR did not evaluate cumulative operational noise impacts from the parking structure. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis for parking structure noise focused on the nearest related project.

The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative operational noise impacts from operations occurring in the above-ground components of the parking structures to nearby sensitive receptors. The Modified Project's parking structure, including the addition of the automated steel parking structure would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Because of the distance between the Modified Project and Related Project 46's parking structure access points, and the orientation of the openings facing opposite directions, the cumulative noise from the Modified Project and Related Project 46's parking structures would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, cumulative impacts from parking structure noise would be less than significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and Related Project 46's parking structures would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, cumulative impacts from parking structure noise would be less than significant.

(3) Noise from People

The Certified EIR did not evaluate cumulative noise from people utilizing outdoor areas. Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative operational noise impact analysis from people utilizing outdoor areas focused on the nearest related project.

The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative operational noise impacts related to people utilizing the projects' outdoor areas. The Modified Project would result in less-than-significant impacts related to people utilizing the Modified Project's outdoor areas. Due to the orientation and shielding of Related Project 46's outdoor courtyards, the cumulative noise from people utilizing the Modified Project and Related Project 46's outdoor areas would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more.

Therefore, the cumulative impacts from noise from people utilizing outdoor areas would be less than significant.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and Related Project 46's outdoor areas would not generate noise that would increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Therefore, the cumulative impacts from noise from people utilizing outdoor areas would be less than significant.

(4) Cumulative Operational Traffic Noise

The Certified EIR concluded the CRA Approved Project would result in significant and unavoidable impacts related to cumulative roadway noise. For the Modified Project, cumulative traffic-generated noise impacts have been assessed based on the difference between current roadway noise levels and future noise levels with the Modified Project and cumulative development. Cumulative development along with the Modified Project would increase local noise levels by a maximum of 1.4 dBA CNEL, which would not exceed the 3.0 dBA CNEL threshold. Because the resulting noise levels would be under 3 dBA, the resulting roadway noise level increase would not be considered significant. Therefore, compared to the analysis in the Certified EIR for the CRA Approved Project, the Modified Project and the related projects would not constitute a significant cumulative impact related to roadway noise.

Like the Modified Project, the No Automated Steel Parking Structure Alternative and the related projects would not constitute a significant cumulative impact related to roadway noise.

2. Reference

For a complete discussion of Noise (Operational Traffic and Cumulative) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

F. Population and Housing

1. Description

a. Population and Employment Growth Forecasts of the RTP/SCS Due to Construction Jobs

The Certified EIR for the CRA Approved Project did not provide construction job forecasts. While the Certified EIR did not discuss construction employment growth forecasts specifically, the Certified EIR concluded construction related population growth impacts as a result of the CRA Approved Project would be less than significant. As described in the Certified EIR for the CRA Approved Project, construction of the CRA Approved Project would result in increased employment opportunities during the CRA Approved Project's construction period. However, the Certified EIR determined the employment opportunities provided by the construction of the CRA Approved Project would not likely result in household relocation by construction workers to the vicinity of the project site. Thus, the

Certified EIR concluded the generation of temporary construction jobs would not cause a permanent increase in local population.

To allow for the development of the Modified Project, minimal additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations, including any renovations necessary to comply with the building code. It is anticipated that, due to different trades working at the project site at different times, the additional construction associated with the Modified Project would generate up to approximately 83 construction-related jobs on a daily basis during the Modified Project's additional three to four month construction period. With the Modified Project's minimal additional construction activities, it is expected that less than 100 additional short-term construction jobs would be generated by the Modified Project. The CRA Approved Project was expected to generate up to 200 – 250 daily construction workers during the construction period. Therefore, the Modified Project's additional construction jobs are not a substantial increase to the total number of construction jobs previously anticipated for the CRA Approved Project.

The employment opportunities provided by the additional construction associated with the Modified Project are not likely to result in any household relocation by construction workers to the vicinity of the project site. Based on the temporary nature and relatively short duration of the construction work involved, it is anticipated that the construction work force would be filled by the local resident population and skilled labor positions that already exist within the greater Los Angeles region.

Additionally, the approximately 83 daily construction workers for the Modified Project's additional construction would represent approximately 0.06 percent of the total workers employed in the construction industry in Los Angeles County in December 2015. Therefore, the Modified Project's projected construction workers could be accommodated by the existing regional supply of construction workers. Further, it is highly unlikely that any construction workers would relocate their place of residence as a consequence of working on the additional construction for the Modified Project given the temporary nature and short duration of the construction work involved. Therefore, indirect population growth and employment growth impacts associated with construction of the Modified Project would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the proposed Modified Project would result in less than significant impacts to population growth and employment growth during construction and as compared to the CRA Approved Project, would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to population growth and employment growth during construction and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during construction.

b. Population and Employment Growth Forecasts of the RTP/SCS Due to Permanent Jobs

The Certified EIR for the CRA Approved Project did not provide permanent job forecasts. While the Certified EIR did not discuss permanent employment growth forecasts specifically, the Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to population growth due to permanent jobs. The Certified EIR estimated the previous uses on the project site generated approximately 35 commercial retail jobs. The Certified EIR calculated the CRA Approved Project would be expected to generate approximately 181 employees at the project site, which resulted in a net increase of 146 jobs. As described in the Certified EIR for the CRA Approved Project, the jobs in the retail and restaurant industries do not generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Certified EIR concluded the CRA Approved Project's proposed uses would not generate substantial indirect population growth or demand for new housing.

The Modified Project would not induce substantial population growth as a result of providing permanent jobs on the project site. As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the amount of commercial floor area for retail and office spaces. The Modified Project would be expected to generate approximately 128 net new employees and approximately 163 gross new employees at the project site. For comparative purposes, the Modified Project's net and gross increase in employment would be 18 fewer employees than estimated in the Certified EIR.

On a Citywide basis, the Modified Project's anticipated employment generation would be well within the anticipated employment growth of 472,700 new jobs expected between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. Furthermore, on a regional scale, the Modified Project's employment generation would be well within the anticipated employment growth of 2,432,000 new jobs expected between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. Therefore, the Modified Project's employees would be within the planned employment growth forecasts. Additionally, jobs in the retail and restaurant industries do not typically generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Modified Project would not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the Modified Project would result in less than significant impacts to population growth and employment growth during operation and as compared to the CRA Approved Project, would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in less than significant impacts to population growth and employment growth during operation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to indirect population growth and employment growth impacts during operation.

c. Population Growth Due to Housing

The Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to population growth due to housing. As described in the Certified EIR for the CRA Approved Project, the CRA Approved Project would generate approximately 744 gross new residents to the project site or 722 net new residents to the project site. The Certified EIR stated, based on the forecast by the Los Angeles Citywide General Plan Framework EIR which the Hollywood Community Plan also utilized, the 722 net new residents would represent approximately 2.1 percent of the overall remaining population growth that was expected to occur in the Hollywood CPA between 2004 and 2010 and 0.4 percent of the overall population growth that was expected to occur in the City of Los Angeles between 2004 and 2010 based on the Regional Comprehensive Plan and Guide (RCPG). Thus, the Certified EIR determined the CRA Approved Project would be consistent with the population growth forecasts of the City's General Plan including the Hollywood Community Plan, and SCAG's RCPG.

Like the CRA Approved Project, the Modified Project would also directly increase population growth within the region as a result of the development of 299 new residential apartment units, including 284 market rate units and 15 affordable housing units at the "Very Low" income level (5 percent of total units). As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the CRA Approved Project's residential units (from 311 to 299), but would also provide affordable housing units. The provision of affordable housing is consistent with the goals and policies set forth in the City's RHNA and Housing Element.

The Modified Project is estimated to introduce approximately 693 net new or approximately 715 gross new permanent residents to the project site. For comparative purposes, the Modified Project's net and gross increase in residents would be 29 fewer residents than estimated in the Certified EIR for the CRA Approved Project. On a regional scale, the Modified Project would represent less than 0.018 percent of the total population growth anticipated to occur within SCAG's regional population growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS. Accordingly, the population growth associated with the Modified Project is within the planned population growth for the citywide and regional population projections and consistent with the population growth forecasts of the City's General Plan and SCAG's 2016-2040 RTP/SCS.

Therefore, operation of the Modified Project would result in less than significant impacts related to population growth. As compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population growth impacts.

Like the Modified Project, operation of the No Automated Steel Parking Structure Alternative would result in less than significant impacts related to population growth and

would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to population growth impacts.

d. Housing Growth Forecasts of the RTP/SCS

The Certified EIR concluded that the CRA Approved Project would result in a less than significant impact with respect to housing growth. The CRA Approved Project would generate a net increase of 302 housing units. The Certified EIR stated the 311 gross increase of dwelling units generated by the CRA Approved Project would represent approximately 4.4 percent of the overall residences expected to be constructed in the Hollywood CPA between 2004 and 2010. The Certified EIR determined the increase of housing units generated by the CRA Approved Project would be consistent with the housing growth forecasts of the General Plan, the City's Framework Element, the City's Housing Element, the Community Plan, the Redevelopment Plan, and the Regional Comprehensive Plan and Guide (RCPG).

Similar to the CRA Approved Project, the Modified Project would serve to implement the residential goals and objectives of the Community Plan by providing a high-density mixed-use development along the Sunset Boulevard corridor, thus minimizing impacts on lower-density residential neighborhoods elsewhere in the project area. The Modified Project would be expected to generate approximately 290 net new dwelling units or 299 gross new dwelling units at the project site. For comparative purposes, the Modified Project's net and gross increase in dwelling units would be 12 fewer dwelling units than estimated in the Certified EIR.

The residential apartment units generated by the Modified Project would represent approximately 0.082 percent of the total housing growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. On a regional scale, the Modified Project would represent approximately 0.02 percent of the total population growth anticipated to occur within SCAG's regional housing growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. As such, similar to the CRA Approved Project, the housing growth associated with the Modified Project is consistent with and has already been anticipated and planned for in the regional housing projections and would be consistent with the housing growth forecasts of the 2016-2040 RTP/SCS for the year 2040 and beyond. Consistent with the CRA Approved analyzed in the Certified EIR, the Modified Project would be consistent with applicable housing growth forecasts. Thus, the Modified Project's housing growth impacts would be less than significant. Therefore, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts.

Like the Modified Project, the Modified Project's housing growth impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts.

(1) Consistency with Regional Housing Policies

The CRA Approved Project would be generally consistent with and would implement the growth and/or housing policies identified in SCAG's RCPG, the City's Framework Element, the City's Housing Element, the Community Plan, and the Redevelopment Plan.

Similar to the CRA Approved Project, the Modified Project would be generally consistent with and would implement the growth and/or housing policies identified in SCAG's 2016-2040 RTP/SCS, the City's General Plan Framework Element, the 2013 to 2021 Housing Element, the Community Plan, and the Redevelopment Plan. The 299 residential apartment units generated by the Modified Project would represent approximately 0.082 percent of the total housing growth anticipated to occur within the City of Los Angeles and approximately 0.02 percent of the total population growth anticipated to occur within SCAG's regional housing growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS housing growth forecast. Furthermore, the Modified Project would be consistent with the growth projections identified by SCAG, as well as the housing goals and policies for the Redevelopment Area pursuant the Redevelopment Plan. The Modified Project would be consistent with all applicable adopted City and regional housing plans, and the Modified Project's impacts related to the consistency with regional housing policies would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Therefore, the Modified Project's housing growth impacts related to the consistency with regional housing policies would not substantially increase the housing growth impacts identified in the Certified EIR for the CRA Approved Project and the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts and consistency with regional housing policies.

Like the Modified Project, the No Automated Steel Parking Structure's housing growth impacts related to the consistency with regional housing policies would not substantially increase the housing growth impacts identified in the Certified EIR for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to housing growth impacts and consistency with regional housing policies.

e. Cumulative Impacts

(1) Population and Employment Growth Due to Construction Jobs

The Certified EIR for the CRA Approved Project did not provide construction job forecasts and did not compare the CRA Approved Project combined with the related projects' employment generation during construction to job forecasts. The Certified EIR did state that while construction of the CRA Approved Project combined with the related projects would generate an increase in construction jobs, it was expected that most construction workers would already reside in the surrounding community or would commute from their existing place of residence. Therefore, the Certified EIR concluded a substantial number

of permanent residents would not be generated as a result of the construction of the CRA Approved Project combined with the related projects, and therefore cumulative impacts would be less than significant.

Similar to the CRA Approved Project, construction of the Modified Project combined with the related projects would generate an increase in construction jobs in the project area. The Modified Project's 100 additional short-term construction jobs would be within the planned construction employment growth projections for the region. Furthermore, the Modified Project's construction jobs would be very limited as compared to the number of construction jobs that would be generated during the construction periods for the related projects. In addition, because of the limited additional construction period for the Modified Project, the overlap of construction activities between the Modified Project and related projects would be expected to be minimal. Similar to the Modified Project, each of the related projects would be subject to the CEQA review process to identify and assess the potential for impacts related to population and employment growth due to construction jobs. Further through the environmental review the related projects would be reviewed to ensure that construction jobs would be within the planned construction employment growth projections for the region. As such, it is expected that the construction jobs generated by the Modified Project and the related projects would be within the total construction jobs projected for the region. Accordingly, the Modified Project and its related projects are not anticipated to exceed the construction employment growth projections stated within the 2016-2040 RTP/SCS from 2015 through 2040 at the regional level.

With regard to the number of cumulative construction workers for the Modified Project and the related projects, while the construction of the Modified Project combined with the related projects would generate an increase in construction jobs in the project area, skilled construction jobs are typically filled by the existing regional supply of construction workers. The Modified Project's additional 83 construction workers that would be on-site on a daily basis would represent approximately 0.06 percent of the existing regional supply of construction workers. Similar to the CRA Approved Project, it is anticipated that most construction workers would come from the existing construction industry workforce within Los Angeles County, and with contractors that already reside in the surrounding community or would commute from their existing place of residence within the region. The Modified Project's additional 83 construction workers that would be on-site on a daily basis for the additional three to four month construction period would be very limited as compared to the number of construction workers for the construction periods for the related projects. In addition, because of the limited additional construction period for the Modified Project, the overlap of construction activities between the Modified Project and related projects would be expected to be minimal. As a result, construction activities for the Modified Project are not anticipated to deplete the supply of available construction workers for a sufficient duration such that construction of the Modified Project and the related projects would require additional construction workers beyond the workforce supply available in Los Angeles County. As such, consistent with the CRA Approved Project, a substantial number of new permanent residents would not be generated as a result of the construction of the Modified Project combined with the related projects and

impacts associated with cumulative population growth due to temporary jobs would be less than significant.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in less than significant cumulative impacts upon population and employment growth due to construction jobs. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to construction jobs.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in less than significant cumulative impacts upon population and employment growth due to construction jobs and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to construction jobs.

(2) Population and Employment Growth Due to Permanent Jobs

The Certified EIR for the CRA Approved Project did not provide permanent job forecasts and did not compare the CRA Approved Project combined with the related projects employment generation during operation to job forecasts. The Certified EIR did state that, similar to the construction jobs created, it was expected that the permanent jobs would be filled by employees already residing in the surrounding community or would commute from their existing place of residence. Therefore, the Certified EIR concluded a substantial number of permanent residents would not be generated as a result of the permanent jobs created by the CRA Approved Project combined with the related projects and cumulative impacts would be less than significant.

Similar to the CRA Approved Project, the Modified Project combined with the related projects would introduce new permanent jobs to the project area. The Modified Project plus the related projects would cumulatively contribute approximately 22,340 new employees to the project area. Of the 22,340 new cumulative employees, the Modified Project's 163 new employees would comprise approximately 0.7 percent. Additionally, the anticipated permanent employees in the Modified Project plus its related projects would represent approximately 4.73 percent of the total employment growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast. On a regional scale, the Modified Project plus its related projects would represent approximately 0.92 percent of the total employment growth anticipated to occur within SCAG's regional employment growth projection between 2012 and 2040, based on the 2016-2040 RTP/SCS employment growth forecast, Accordingly, the Modified Project and its related projects would not exceed the growth projections stated within the 2016-2040 RTP/SCS at a City or regional level. Therefore, the Modified Project and its related projects would be within the employment growth projections of the 2016-2040 RTP/SCS. As such, the cumulative employment growth associated with the Modified Project and the related projects is consistent with the employment growth forecasts and has already been anticipated and planned for.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in a less than significant cumulative impact related to population and employment growth due to permanent jobs. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to permanent jobs.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in a less than significant cumulative impact related to population and employment growth due to permanent jobs and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population and employment growth due to permanent jobs.

(3) Cumulative Population Growth

The Certified EIR concluded the new residents generated from the CRA Approved Project and the related projects would be consistent with the population growth forecast for the Hollywood CPA and impacts associated with cumulative population growth would be less than significant.

For comparative purposes, the Modified Project and its related projects would generate 22,162 new residents as compared to the CRA Approved Project and its related projects' 14,137 new residents, though the residents resulting from the Modified Project and its related projects would be spread over a larger area that goes beyond the Hollywood CPA. The 722 new residents anticipated to be generated by the CRA Approved Project's 311 new residents' would represent an approximately 5.2 percent contribution of the 14,137 new cumulative residents in the Hollywood CPA. Compared to the CRA Approved Project, the 661 new residents anticipated to be generated by the Modified Project would represent approximately 3 percent of the 22,162 new cumulative residents both within and outside of the Hollywood CPA. Thus, the Modified Project would contribute a smaller percentage of cumulative residents than the CRA Approved Project.

With respect to residents, the Modified Project plus its related projects would represent approximately 2.9 percent of the total population growth anticipated to occur within the City of Los Angeles between 2012 and 2040, based on the 2016-2040 RTP/SCS population growth forecast. On a regional scale, the Modified Project plus its related projects would represent approximately 0.58 percent of the total population growth anticipated to occur within SCAG's regional population growth projection between 2012

The Certified EIR only analyzed the cumulative new residents located in the Hollywood CPA, while the Modified Project's analysis analyzes the cumulative new residents located in a two mile radius, including related projects located outside the Hollywood CPA.

and 2040, based on the 2016-2040 RTP/SCS population growth forecast. Accordingly, the Modified Project and related projects would not exceed the growth projection stated within the 2016-2040 RTP/SCS at a City or regional level. As such, similar to the CRA Approved Project, the cumulative population growth associated with the Modified Project and the related projects is consistent with the population growth forecasts and has already been anticipated and planned for.

Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would result in a less than significant cumulative impact related to population growth. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would result in a less than significant cumulative impact related to population growth and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative population growth.

(4) Cumulative Housing Growth

The Certified EIR concluded the new residential units generated from the CRA Approved Project and related projects would be consistent with the housing growth forecast for the Hollywood CPA and impacts associated with cumulative housing growth would be less than significant.

The Modified Project plus its related projects involving residential developments would cumulatively contribute approximately 10,028 new residential units to the area. For comparative purposes, the Modified Project and the related projects increase in dwelling units would be 10,028 new dwelling units as compared to the CRA Approved Project and its related projects' 6,283 new dwelling units, though the residential units resulting from the Modified Project and its related projects would be spread over a larger area that goes beyond the Hollywood CPA.² As compared to the CRA Approved Project, the Modified Project would result in a reduction in the number of residential dwelling units (from 311 to 299). Furthermore, the CRA Approved Project's 311 new residential units would represent approximately 5 percent of the 6,283 new cumulative residential units in the Hollywood CPA. Compared to the CRA Approved Project, the Modified Project's 299 new residential units would represent approximately 3 percent of the 10,028 new cumulative residential units both within and outside of the Hollywood CPA. Thus, the Modified Project would contribute a smaller percentage of cumulative residential units than the CRA Approved Project.

The Certified EIR only analyzed the cumulative new residents located in the Hollywood CPA, while the Modified Project's analysis analyzes the cumulative new residents located in a two mile radius, including related projects located outside the Hollywood CPA.

Based on the 2016-2040 RTP/SCS housing growth projection for City of Los Angeles subregion, the remaining projected housing growth for the City would be 364,800 housing units between 2012 and 2040. The Modified Project and related projects would not exceed the growth projection stated within the 2016-2040 RTP/SCS at a City or regional level. As such, similar to the CRA Approved Project, the cumulative housing growth associated with the Modified Project and the related projects is consistent with the housing growth forecasts and has already been anticipated and planned for. Thus, consistent with the Certified EIR's analysis of the CRA Approved Project, the Modified Project in combination with the identified related projects would have a less than significant impact on cumulative housing growth. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative housing growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative in combination with the identified related projects would have a less than significant impact on cumulative housing growth and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative housing growth.

2. Reference

For a complete discussion of Population, Housing, and Employment see Sections IV.E Population, Housing & Employment and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

- **G.** Land Use Planning (Operation and Cumulative)
 - **1.** Description
 - a. Land Use Compatibility

The Certified EIR concluded the CRA Approved Project would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant. As described in the Certified EIR, the design, height and massing of the CRA Approved Project would be consistent with existing development in the area and would improve upon the project site's current aesthetics. The Certified EIR concluded that the CRA Approved Project's 23-story structure (including ground floor and parking uses) are compatible with the surrounding 2- to 22-story commercial and multi-family residential buildings in this area of Hollywood.

The Modified Project would enhance a key public transportation center by providing high-density housing in a designated transit priority area. Consistent with SB 375, the Modified Project would also help revitalize the area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses. Furthermore, the Modified Project would include an approximate 18,962 square foot park, which would add much-needed green space and passive

recreational open space opportunities for the neighborhood. The design, height and massing of the Modified Project would be consistent with those of the CRA Approved Project and the project site. The Modified Project is shorter than the CRA Approved Project (from 23 stories at 260 feet with a 65-foot parking podium to 22 stories at 250 feet with a 50-foot parking podium). In addition, consistent with the analysis in the Certified EIR, the project site is located on one of the largest mixed-use thoroughfares in the Hollywood Area; Sunset Boulevard, and the Modified Project would continue to be compatible with the scale and massing of the other structures along Sunset Boulevard and the project site's immediate vicinity. Further, the project site's location in close proximity to Metro Red Line Stations located at Hollywood Boulevard and Vine Street and Hollywood Boulevard and Western Avenue would make it an appropriate place for a mixed-use, multiple-family residential project. Through its proposed uses and architectural form, the Modified Project would become fully integrated into the existing streetscape and community. Thus, the Modified Project would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant, which is consistent with the analysis in the Certified EIR. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to compatibility with the surrounding land uses and land use compatibility impacts.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially compatible with the surrounding land uses and land use compatibility impacts would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to compatibility with the surrounding land uses and land use compatibility impacts.

- **b.** Consistency with Regional Land Use Policies and Regulations
 - (1) Regional Comprehensive Plan

The Certified EIR concluded that the CRA Approved Project would be consistent with the Regional Comprehensive Plan and Guide (RCPG) and result in a less than significant impact. The Modified Project would be substantially consistent with the applicable 2008 Regional Comprehensive Plan (2008 RCP) policies including providing housing in close proximity to jobs and services, offering a variety of housing options, and creating more livable and safer neighborhoods. The Modified Project would offer residential units located adjacent to major bus routes and Metro Red Line stations. The Modified Project's close proximity to commercial uses would also provide opportunities for pedestrian travel to nearby jobs. For these reason, land use impacts associated with the Modified Project's consistency with the 2008 RCP policies are considered less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, land use impacts associated with the No Automated Steel Parking Structure Alternative's consistency with the 2008 RCP policies are considered

less than significant, consistent with the analysis in the Certified EIR for the CRA Approved Project.

(2) 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS)

The Certified EIR concluded that a less than significant impacts would occur with respect to population growth as the CRA Approved Project would be consistent with the population growth forecasts of the General Plan and the Regional Comprehensive Plan and Guide (RCPG). The Modified Project's net and gross increase in residents would be 29 fewer residents than estimated in the Certified EIR for the CRA Approved Project. Thus, the Modified Project reduces the number of new residents to the project site compared to the CRA Approved Project and the Modified Project would represent approximately 0.09 percent of the total population growth anticipated to occur within the City of Los Angeles and 0.018 percent of the total population growth anticipated to occur within region between 2012 and 2040, based on the 2016-2040 RTP/SCS. As compared to the CRA Approved Project, the Modified Project would result in a slight reduction to the CRA Approved Project's residential units (from 311 to 299). The 299 residential apartment units generated by the Modified Project would represent approximately 0.08 percent of the total housing growth anticipated to occur within the City of Los Angeles between 2012 and 2040. On a regional scale, the Modified Project would represent approximately 0.02 percent of the total population growth anticipated to occur within SCAG's regional housing growth projection. As such, it is reasonable to conclude that the housing growth associated with the Modified Project has already been anticipated and planned for in the citywide and regional housing projections and would be consistent with the housing growth forecasts of the General Plan and 2016-2040 RTP/SCS. Therefore, the Modified Project's residents would be well within SCAG's population projection for the subregion and land use consistency impacts would be less than significant, which is consistent with the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's residents would be well within SCAG's population projection for the subregion and land use consistency impacts would be less than significant, which is consistent with the analysis in the Certified EIR.

(3) South Coast Air Quality Management District

The Certified EIR concluded a less than significant impact would occur related to consistency with the AQMP. Consistent with the CRA Approved Project, the Modified Project would result in a less than significant impact with respect to Air Quality as it would not conflict with or obstruct implementation of the AQMP.

Consistent with the CRA Approved Project and the Modified Project, the No Automated Steel Parking Structure would result in a less than significant impact with respect to Air Quality as it would not conflict with or obstruct implementation of the AQMP.

(4) Regional Water Quality Control Board

The Certified EIR concluded that impacts related to consistency with the Regional Water Quality Control Board (RWQCB) regulatory requirements would be less than significant. As described in the Certified EIR, the CRA Approved Project would prepare a Storm Water Pollution Prevention Plan (SWPPP), implement the best management practices (BMPs) in the SWPPP, and comply with the City's surface water discharge requirements. Consistent with the CRA Approved Project, the Modified Project would obtain a National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit from the RWQCB, prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity, implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical, and the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the project SWPPP and compliance with the City's surface water discharge requirements would ensure that the Modified Project's construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As such the Modified Project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

(5) Congestion Management Plan

The Certified EIR concluded a less than significant impact related to consistency with the Congestion Management Plan (CMP) would occur. The Modified Project's Traffic Study, which is presented in greater detail in Section IV.K.1 (Traffic/Transportation) of the Draft Supplemental EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (LADOT) Guidelines. As discussed in Section IV.K.1 of the Draft Supplemental EIR, the Modified Project would not significantly impact any CMP roadway segments or freeway on-/off-ramps. Therefore the Modified Project would be consistent with the CMP and the prior conclusion of the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the CMP and the prior conclusion of the Certified EIR for the CRA Approved Project.

c. Consistency with Local Land Use Policies and Regulations

(1) Framework Element

As described in the Certified EIR, the CRA Approved Project would promote the general goals and policies of the Community Plan as it would encourage and contribute to the economic and social and physical health, safety, welfare, and convenience of the Community. Thus, the Certified EIR concluded a less than significant impact would occur with respect to consistency with the Hollywood Community Plan.

The Modified Project would be generally consistent with the General Plan Framework Land Use Chapter because it is located within a transit priority area, which would encourage visitors of the commercial uses and residents of the apartment units to use public transportation services and add green space and passive recreational open space opportunities for the neighborhood. The Modified Project's consistency with specific Goals and Objectives of the General Plan Framework Land Use Chapter are discussed in detail in Section IV.H, Land Use Planning, of the Draft Supplemental EIR. As detailed therein, the Modified Project would be consistent with the applicable objectives in the General Plan Framework Land Use Chapter. Therefore, no significant impacts related to consistency with the General Plan Framework Element would occur, which is consistent with the conclusion in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the applicable objectives in the General Plan Framework Land Use Chapter and no significant impacts related to consistency with the General Plan Framework Element would occur, consistent with the conclusion in the Certified EIR for the CRA Approved Project.

(2) Hollywood Community Plan

The Certified EIR concluded a less than significant impact would occur with respect to consistency with the Hollywood Community Plan. As described in the Certified EIR, the CRA Approved Project would promote the general goals and policies of the Community Plan as it would encourage and contribute to the economic and social and physical health, safety, welfare, and convenience of the Community.

The Modified Project is proposing a General Plan Amendment which would unify the Land Use Designations across the project site to Regional Center Commercial, allowing for floor area averaging and the provision of a public park; and bring the Land Use Designations into conformance with the requested Zone Change and Height District Change. The mixed-use nature of the Modified Project would serve to balance growth and stability by providing a mix of both jobs and housing in an underutilized area of Hollywood. The proposed mixed-use project would promote the general goals and policies of the Community Plan. A detailed analysis of the consistency of the Modified Project with the applicable objectives and policies of the Hollywood Community Plan is presented in Section IV.H, Land Use Planning, Table IV.H-3, of the Draft Supplemental EIR. As with the CRA Approved Project, the Modified Project would be consistent with

the City's goals of encouraging development around transit systems and would promote the renewal and rehabilitation of an underutilized area. The addition of community-serving retail uses and housing to the area would enhance the positive characteristics of the neighborhood. Therefore, no significant impacts related to consistency with the Community Plan would occur, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative no significant impacts related to consistency with the Community Plan would occur, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

(3) Air Quality Element

The Certified EIR concluded the CRA Approved Project would not conflict with the Air Quality Element of the General Plan. The Modified Project would support the goals of the Air Quality Element of the General Plan by developing a mixed-use residential apartment and commercial complex in proximity to transit. Additionally, the Modified Project would: implement an employer and site based Transportation Demand Management (TDM) program; incentivize carpooling; provide electric vehicle ready parking spaces and electric vehicle-charging stations; include bicycle parking spaces; and implement sustainable strategies. Thus, the Modified Project would not conflict with the Air Quality Element of the General Plan and is consistent with the analysis of the CRA Approved Project in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Air Quality Element of the General Plan and is consistent with the analysis of the CRA Approved Project in the Certified EIR.

(4) Conservation Element

The Certified EIR concluded that the CRA Approved Project would be consistent with the Conservation Element of the General Plan. The project site and vicinity contain no significant biological resources and the Modified Project would not have a significant impact on biological, cultural, or historical resources. The Modified Project would include measures (required by the LAMC) to prevent the destruction of any cultural or historical resources should they be found during construction of the Modified Project. Therefore, as with the CRA Approved Project, the Modified Project would be substantially consistent with the Conservation Element of the City of Los Angeles General Plan and the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Conservation Element of the City of Los Angeles General Plan and the analysis in the Certified EIR.

(5) Housing Element

The Certified EIR concluded that the CRA Approved Project would be substantially consistent with the Housing Element of the General Plan and would not conflict with any of the policies contained therein. The Modified Project would be consistent with many objectives of the Housing Element including providing housing in close proximity to jobs and services, offering a variety of housing options, and creating more livable and safer neighborhoods. The Modified Project would offer residential units located adjacent to major bus routes and Metro Red Line stations. The Project's close proximity to commercial uses would also provide opportunities for pedestrian travel to nearby jobs. In addition, the Modified Project would be a safe project for residents and the community. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would be substantially consistent with the Housing Element and would not conflict with any of the policies contained therein.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Housing Element and would not conflict with any of the policies contained therein.

(6) Safety Element

The Certified EIR concluded, as the Safety Element is concerned with reducing risks to the maximum extent feasible and does not require risks to be absolutely eliminated, the CRA Approved Project would be substantially consistent with the Safety Element of the General Plan. The Modified Project would not be associated with risks including earthquakes, floods, fires, lead, asbestos, and underground storage tanks. Furthermore, the Modified Project would implement both LAMC-required mitigation and project mitigation measures to reduce any risks to less-than-significant levels. As the Safety Element is concerned with reducing risks to the maximum extent feasible, the Modified Project would be substantially consistent with the Safety Element and the analysis in the Certified EIR.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be substantially consistent with the Safety Element and the analysis in the Certified EIR.

(7) Mobility Plan 2035

The Certified EIR concluded that the CRA Approved Project would not conflict with the Transportation Element of the City of Los Angeles General Plan. The Modified Project would be consistent with the goals of the Mobility Plan 2035, specifically: ensuring that 90 percent of households have access within one mile to the Transit Enhanced Network by 2035; ensuring that 90 percent of all households have access within one-half mile to high quality bicycling facilities by 2035; and increasing the combined mode split of persons who travel by walking, bicycling or transit to 50 percent by 2035. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would not conflict with the Mobility Plan of the City of Los Angeles General Plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Mobility Plan of the City of Los Angeles General Plan.

d. Hollywood Redevelopment Plan Consistency

The Certified EIR concluded the CRA Approved Project would not conflict with the Redevelopment Plan and would result in less than significant land use impacts. As detailed in Section IV.H, Land Use Planning, Table IV.H-4, of the Draft Supplemental EIR, the Modified Project would serve to implement several Redevelopment Plan goals and objectives. The mixed-use nature of the project would promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors. The Modified Project's mixed-use nature would also enable residents to live and work in Hollywood and would also serve to reduce regional traffic congestion. The Modified Project would provide 299 residential apartment units with 5 percent of the total units (15 units) reserved for the "Very Low" income level. The Modified Project's housing component would provide housing opportunities and increase the supply of market rate and affordable housing within the Redevelopment Plan Area.

The project site's location in proximity to public transportation systems would further promote sound development practices. As with the CRA Approved Project, the Modified Project proposes a public park. The Modified Project's public park would directly promote and encourage development of recreational facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers. Therefore, consistent with the analysis in the Certified EIR, the Modified Project would not conflict with the Redevelopment Plan, and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Redevelopment Plan.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not conflict with the Redevelopment Plan, and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Redevelopment Plan.

e. Open Space Requirements

As with the CRA Approved Project, the Modified Project is subject to the open space requirement for six or more residential units. The Certified EIR determined the CRA Approved Project would fall short of providing the required open space area. However, the Certified EIR stated that with the approval of the variance, the CRA Approved Project would conform to the requirements of the LAMC. As with the CRA Approved Project, the Modified Project would fall short of providing the required open space area. In order to permit the open space proposed, the Applicant is requesting an Affordable Housing On-Menu Incentive, per LAMC Section 12.22 A.25(f)(6), to allow a 20 percent decrease in the total amount of open space required by Code. Therefore, in conjunction with the On-

Menu Incentive and consistent with the analysis in the Certified EIR, the Modified Project would conform to the open space requirements of the LAMC, and land use impacts associated with the provision of open space would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the open space requirements of the LAMC.

Like the Modified Project, land use impacts associated with the provision of open space for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the open space requirements of the LAMC.

f. Parking

The Certified EIR concluded the CRA Approved Project would conform to LAMC parking requirements with the approval of requested actions and, thus, impacts would be less than significant with mitigation incorporated. The Modified Project is requesting confirmation of compliance with Affordable Housing Reduced Parking Option 1 for all residential units under LAMC Section 12.22 A.25(d)(1). In addition, pursuant to LAMC Section 12.21.A.4, a 10 percent reduction in residential parking spaces and a 20 percent reduction to the commercial parking spaces is allowed under the Municipal Code's bicycle parking reduction provision where automobile parking spaces required by the Code are replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces. As detailed in Section IV.H, Land Use Planning, of the Draft Supplemental EIR, the Modified Project would provide sufficient vehicle and bicycle parking to conform to LAMC requirements, and impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the parking requirements of the LAMC.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would provide sufficient vehicle and bicycle parking with the adoption of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls, which would conform to LAMC requirements, and impacts would be less than significant. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the parking requirements of the LAMC.

g. Hollywood Signage Supplemental Use District Consistency

The Certified EIR did not analyze the CRA Approved Project's consistency with the Hollywood Signage Supplemental Use District (SUD). However, the Certified EIR

concluded that with implementation of mitigation measures, the CRA Approved Project's land use impacts would be less than significant.

Compared to the CRA Approved Project, the Modified Project proposes a reduction to the signage program by eliminating one sign and providing only one approximately 1,205 square-foot supergraphic sign located on the southwest corner of the podium structure at Sunset Boulevard and Gordon Street facing south. The Modified Project's one supergraphic sign would comply with all the requirements of the prior Hollywood Signage SUD Ordinance No. 176,172, pursuant to the grandfathering rights set forth in Section K.2 of the Amended Hollywood Signage SUD Ordinance No. 181,340. In addition to offsite advertising, consistent with the CRA Approved Project, the Modified Project would include informational signage to identify the proposed on-site uses and retail establishments, and directional signage to inform people of the appropriate parking areas, vehicular and pedestrian ingress/egress patterns, and emergency evacuation routes, as appropriate. Moreover, the Modified Project is consistent with the Amended Design for Development for Signs in Hollywood (Amended Sign DFD), which was adopted by the CRA Board on January 20, 2005. Similar to the CRA Approved Project, the Modified Project's proposed signage plan would comply with the LAMC Sign Regulations (Article 4.4, Section 14.4.) and the specific provisions identified by the Amended Hollywood Signage SUD and the Amended Sign DFD.

Therefore, the Modified Project would be consistent with the Hollywood Signage Supplemental Use District and the Amended Sign DFD, and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Hollywood Signage Supplemental Use District and Amended Sign Supplemental Use District.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would be consistent with the Hollywood Signage Supplemental Use District and the Amended Sign DFD, and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Hollywood Signage Supplemental Use District and Amended Sign Supplemental Use District.

h. ZI No. 2427 and Clean Up Green Up Ordinance

Both ZI No. 2427 (Freeway Adjacent Advisory Notice for Sensitive Uses) and the Clean Up Green Up Ordinance 184,246 became effective after the Certified EIR was prepared. As such, the Certified EIR did not address the CRA Approved Project's consistency with ZI No. 2427 or the Clean Up Green Up Ordinance.

Consistent with ZI No. 2427's recommendation to reduce exposure through project design, the Modified Project would reduce exposure to air pollution from the proximity to freeway through the design and orientation of the residential uses such that they are

located on the portions of the project site furthest from the freeway. Furthermore, as provided for in PDF IV-H-1, the Modified Project is consistent with ZI-No. 2427's recommendation to improve indoor air quality with MERV-rated or HEPA Air Filtration Equipment. The Modified Project will at minimum install and maintain air filters meeting the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11. Additionally, as may be required, the Modified Project will be consistent with the Clean Up Green Up Ordinance requirement to provide MERV 13 filters in regularly occupied areas of mechanically ventilated buildings within 1,000 feet of a freeway. Therefore, with the Modified Project's location of the residential uses and the installation and maintenance of MERV11 filters at minimum, the Modified Project would be consistent with ZI No. 2427 and would result in less than significant land use impacts. In addition, the Modified Project will be consistent with the Clean Up Green Up Ordinance as may be required. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with ZI No. 2427 and the Clean Up Green Up Ordinance.

Like the Modified Project, the No Automated Steel Parking Structure Alternative will be consistent with ZI No. 2427 and the Clean Up Green Up Ordinance as may be required and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with ZI No. 2427 and the Clean Up Green Up Ordinance.

i. Cumulative Impacts

The Certified EIR determined no significant cumulative land use impacts were anticipated. Cumulative land use impacts could occur if other related projects in the vicinity of the project site would result in land use incompatibility effects in conjunction with the impacts of the Modified Project. As with the CRA Approved Project, the Modified Project would implement important local and regional goals and policies for the Hollywood area, which would assist the City of Los Angeles in achieving short- and long-term planning goals and objectives. Future development associated with the related projects would support the redevelopment of the Hollywood area, which is consistent with SCAG and City policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the diversity of uses. Furthermore, all related projects would be subject to the same applicable planning documents as the Modified Project, specifically with respect to the Hollywood Community Plan, the Planning and Zoning Code, the Hollywood Redevelopment Plan, and the other regional land use plans. All of the related projects would need to demonstrate consistency with the development standards in those applicable planning documents in order to be approved. Therefore, no significant cumulative land use and planning impacts are anticipated, and cumulative impacts would be considered less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to land use.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to land use.

2. Project Design Features

The following Project Design Feature is relevant to Land Use Planning:

PDF IV-H-1: The Modified Project shall install air filtration systems in compliance with the minimum MERV filtration rating requirements of ZI. No. 2427 and Clean Up Green Up Ordinance (Ord. No. 184,245), as applicable to the Modified Project's proposed land uses and regularly occupied areas.

3. Reference

For a complete discussion of Land Use Planning (Operation and Cumulative) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

- **H.** Public Utilities (Water, Wastewater, Energy, Cumulative)
 - 1. Description
 - **a.** Water
 - (1) Construction

The Certified EIR concluded the project area for the CRA Approved Project was supported by adequate potable water infrastructure and that related impacts resulting from the CRA Approved Project would be less than significant during project construction. The Certified EIR stated that although the development of new service connections for the CRA Approved Project may occasionally result in service interruptions in water services for existing customers, temporary and short-term disruptions in local water service during the construction period would be limited, and any associated impacts would be less than significant.

Compared to the CRA Approved Project, construction of the Modified Project would include minimal additional construction for the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Similar to the CRA Approved Project, the Modified Project is also served by sufficient water conveyance infrastructure as the infrastructure in the vicinity of the project site has not substantially changed since the Certified EIR. Because the Modified Project's additional construction period would involve minimal water demand, the Modified Project's water demand during the additional construction period would be accommodated by the water conveyance infrastructure. Thus, the water demand during the additional construction

period for the Modified Project would not result in a substantial increase to the water demand for construction of the CRA Approved Project.

Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's construction would not require the construction of new water treatment facilities or storm water drainage facilities and sufficient water supplies are available to serve the Modified Project from existing entitlements and resources during construction. Accordingly, the Modified Project would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure for construction. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water resources/water conveyance infrastructure for construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure for construction and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water resources/water conveyance infrastructure for construction.

(2) Operation

(a) Water Conveyance Infrastructure for Operation

The Certified EIR stated the CRA Approved Project's water consumption (quantity, size, and type of infrastructure) would be determined by the CRA Approved Project applicant's Engineering consultants based on the Los Angeles Department of Building and Safety and applicable building code requirements. The Certified EIR also explained that the onsite (sprinkler system and private fire hydrants) and off-site (public fire hydrants) fire flow demands would be determined based on the Los Angeles City Fire Department (LAFD) and applicable building code requirements. Finally, the Certified EIR stated once a determination of the project's domestic and fire demands has been made, LADWP would assess the need for additional facilities. During construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site, a new fire hydrant was installed on Sunset Boulevard as required by the LAFD.

Similar to the CRA Approved Project, final fire flow requirements for the Modified Project would be verified during the review and approval process for the Modified Project before a certificate of occupancy is issued. Overall, the Modified Project would be expected to follow the same process of water demand and need as the CRA Approved Project. However, it is not expected that any further improvements or additional facilities to the water system serving the project site or surrounding area would be needed for the Modified Project because it is expected that all required improvements to the water system were previously conducted during construction of the vacant building and closed public park on the project site. The modifications required for the Modified Project are not

expected to require any additional water conveyance infrastructure, including water facilities and storm water drainage facilities, during operation from that which was necessary for the CRA Approved Project. Therefore, impacts to water conveyance infrastructure during the operation of the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water conveyance infrastructure during operation.

Like the Modified Project, impacts to water conveyance infrastructure during the operation of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water conveyance infrastructure during operation.

(b) Water Demand

Under the provisions defined in Section 10910-10915 of the State Water Code, the CRA Approved Project was not subject to a Water Supply Assessment (WSA). The Certified EIR concluded the CRA Approved Project's impacts would be less than significant related to increasing water demands within the LADWP service area during operation of the CRA Approved Project.

The Modified Project involves overall reductions to the water demand generating land uses analyzed for the CRA Approved Project, and consistent with the CRA Approved Project, a WSA is not required for the Modified Project. The Modified Project is estimated to generate a net demand of 48,999 gallons per day (gpd) or 55 acre-feet of water per year (AFY) and a gross demand of 60,138 gpd or 68 AFY and the Modified Project's net and gross increase in water demand would be less than the CRA Approved Project's net and gross increase in water demand. In addition, since the Modified Project's population, housing, and employment growth projections are within the forecasts of the 2015 UWMP, it is anticipated that the Modified Project's water demands are within the LADWP's 25-year water demand growth projected in the 2015 UWMP. Therefore, the Modified Project's water demand would be consistent with the conclusion for the CRA Approved Project and would not substantially increase the water demand impacts identified in the Certified EIR for the CRA Approved Project.

Although water supplies are currently available and adequate to serve the needs of the Modified Project, several factors affect the long-term availability of projected water supplies for the City of Los Angeles as a whole. As such, the Modified Project would implement City of Los Angeles water conservation measures including Regulatory Compliance Measures CM I.1-1, CM I.1-2; and Certified EIR Code-Required Measure I.1-1 and Certified EIR Code-Required Measure I.1-2 (Regulatory Compliance Measures), which ensure that the Modified Project would: comply with the City's Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits as applicable; provide a reduction of overall use of potable water by 20 percent from that allowed under the

California Building Code (CBC), pursuant to City Ordinance No. 181,480; comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance; state that if conditions dictate LADWP may postpone new water connections for the Modified Project until water supply capacity is adequate. With implementation of the regulatory compliance measures, the Modified Project's impact upon water demands within the LADWP service area would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Moreover, the estimated water demands associated with the Modified Project during operation are less than the estimated water demands associated with operation of the CRA Approved Project. Therefore, sufficient water supplies are available to serve the Modified Project from existing entitlements and resources. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water demands during operation.

Like the Modified Project, the No Automated Steel Parking Structure's impact upon water demands would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water demands during operation.

(3) Cumulative

The Certified EIR did not calculate the water demand of the CRA Approved Project and related projects totals, but stated the projected water supplies included in the 20-year projection contained in the 2005 UWMP would be expected to meet water demands associated with the CRA Approved Project and the demands of the related projects. Therefore, the Certified EIR concluded impacts to water service and regional supplies would be less than significant.

Implementation of the Modified Project in conjunction with cumulative development within the City of Los Angeles would further increase cumulative demands for water supplies in the LADWP service area. The gross water demand of Modified Project and related projects totals approximately 4,178,261.2 gpd or 4.2 mgd. In terms of the City's overall water supply condition, the water demands for projects that are consistent with the City's General Plan have been taken into account in the planned growth of the Water System. For projects that are not consistent with the General Plan or that meet the requirements established in Sections 10910-10915 of the State Water Code, a Water Supply Assessment report demonstrating sufficient water availability would be required on a project-by-project basis.

As discussed in Section IV.G Population and Housing, of the Draft Supplemental EIR the Modified Project and the related projects would not exceed the growth projections stated within the 2016-2040 RTP/SCS. Because demographic data, including growth forecasts, from SCAG are used in the LADWP's forecasting future water demand growth in the 2015 UWMP, the LADWP's water supplies would meet the projected water demand associated with the Modified Project and the related projects. As such, the Modified Project and the

related projects would result in a less than significant cumulative impact related to water resources, which is consistent with the CRA Approved Project and would not substantially increase the cumulative water demand impacts identified in the Certified EIR for the CRA Approved Project.

In addition, the analysis of the Modified Project's impacts to water resources impacts concluded that the Modified Project would result in less than significant impacts, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative water resources impacts will be less than the CRA Approved Project's contribution to cumulative water resources impacts because, the water demand associated with the Modified Project's operations is less than the CRA Approved Project's water demand from operations. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to water resources, and the Modified Project would serve to further reduce those impacts. Therefore, the Modified Project's cumulative impact to water resources also would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to water resources.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impact to water resources would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to water resources.

b. Wastewater

The Certified EIR concluded the CRA Approved Project would result in a less than significant impact related to wastewater treatment and/or conveyance infrastructure. Nevertheless, the Certified EIR stated, should insufficient capacity exist, the applicant would be required to build a secondary line to connect to the flow to the nearest lines with capacity to serve the project. However, no additional lines were necessary for the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site.

The Modified Project is anticipated to generate approximately 40,040 gallons per day (gpd) of net wastewater, or 14.6 million gallons annually and approximately 49,439 gpd of gross wastewater, or 18 million gallons annually. The Modified Project's gross increase in wastewater generation would be 49,439 gpd of wastewater, or 18 million gallons annually as compared to the CRA Approved Project's gross increase of 58,362 gpd of wastewater, or 21.3 million gallons annually. For comparative purposes, the Modified Project's net and gross increase in wastewater generation would be less than the CRA Approved Project's net and gross increase in wastewater generation.

No further improvements to the wastewater system, including installation of a secondary line, serving the project site or surrounding area are anticipated to be required as a result of the Modified Project, as the modifications under the Modified Project would decrease

wastewater flows as compared to the CRA Approved Project and the vacant 22-story, approximately 250 foot high mixed use building and closed approximately 18,962 square foot public park on the project site did not require improvements to the wastewater system. The Modified Project's projected gross increase of 49,439 gpd is within the gross increase estimated for the CRA Approved Project, and would represent a fraction of one percent of the excess treatment capacity presently available at the Hyperion Treatment Plant (450 mgd). Similar to the CRA Approved Project, sewage generated by the Modified Project would continue to be conveyed and treated at the Hyperion Treatment Plant, which has adequate capacity to accommodate the increased wastewater flows. Thus, the Regional Water Quality Control Board (RWQCB) treatment standards area would be maintained and impacts would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Similar to the CRA Approved Project, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Modified Project and would help reduce the amount of wastewater generated by the Modified Project. As such, these measures would further reduce Modified Project impacts with respect to the wastewater treatment capacity. Furthermore, implementation of Regulatory Compliance Measure CM I.2-1, which ensures compliances with the 2010 L.A. Green Code, would further reduce the Modified Project's less than significant impacts related to wastewater services. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would be consistent with the wastewater treatment requirements of the RWQCB, there is adequate capacity to serve the Modified Project, and the Modified Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities. Accordingly, impacts with respect to the existing wastewater infrastructure would be less than significant. Moreover, the wastewater generation of the Modified Project is less than the wastewater generation of the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to wastewater services.

Like the Modified Project, impacts with respect to the existing wastewater infrastructure for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to wastewater services.

(1) Cumulative

The Certified EIR determined the cumulative sewage generation with the related projects would be within the excess treatment capacity currently available and projected at HTP. Therefore, the Certified EIR concluded cumulative impacts on wastewater services would be less than significant.

The total gross sewage generation by the related projects and the Modified Project would be approximately 3,398,543.8 gpd, or about 3.4 mgd. The cumulative sewage generation for the Modified Project and the related projects would represent approximately 0.6 percent of HTP's daily effluent capacity (550 mgd), or approximately 1.7 percent of HTP's current excess capacity (190 mgd). Similar to the CRA Approved Project and its related projects' cumulative sewage generation, these increases would be well within the excess treatment capacity currently available and projected to be available at HTP. While the total sewage generation by the related projects and the Modified Project would be more than the total sewage generation analyzed in the Certified EIR for the previous list of related projects and the CRA Approved Project (from 1,260,662 gpd, or about 1.2 mgd to 3,398,543.8 gpd, or about 3.4 mgd), sewage generated by the Modified Project would contribute approximately 1.5 percent of the total cumulative sewage generation created by the related projects. The Modified Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities.

Furthermore, the analysis of the Modified Project's impacts to wastewater services concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative wastewater services impacts will be less than the CRA Approved Project's contribution to cumulative wastewater services impacts because the wastewater services impacts associated with the Modified Project are less than the CRA Approved Project's wastewater services impacts. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to wastewater services, and the Modified Project would serve to further reduce those impacts. Further, similar to the Modified Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on wastewater services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to wastewater services.

Like the Modified Project, cumulative impacts on wastewater services for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to wastewater services.

c. Energy

(1) Construction

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to energy resources during construction. The Certified EIR determined that, due to the relatively short duration of the construction process, and the

fact that the extent of fuel consumption is inherent to construction projects of the size and nature of the CRA Approved Project, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies.

Construction of the Modified Project would consume approximately 186,492 gallons of fuel including approximately 62,645 gallons of diesel fuel and 123,847 gallons of gasoline. In comparison to the CRA Approved Project, the fuel consumed during the Modified Project's construction would be 15,520 gallons less than the fuel consumed during the CRA Approved Project's construction. Thus, it is anticipated the energy consumed during the construction period of the Modified Project would not substantially increase the energy from fuel consumed during the CRA Approved Project's construction period.

Furthermore, no analysis for electricity or natural gas during construction was done in the Certified EIR for the CRA Approved Project because the equipment during construction would consume a minimal amount of electricity and natural gas and, therefore, would not be substantial. Similarly, the equipment during the Modified Project's construction would consume a minimal amount of electricity and natural gas and, therefore, the need for electricity and natural gas during the Modified Project's construction would not be substantial. Therefore, the energy resources impacts as a result of construction of the Modified Project would not substantially increase the energy resources impacts identified in the Certified EIR for the CRA Approved Project, and impacts would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during construction.

Like the Modified Project, energy resources impacts as a result of construction of the No Automated Streel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during construction.

(2) Operation

(a) Electricity

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon electricity. The Certified EIR stated that with modern energy-efficient construction materials and operating equipment, the CRA Approved Project would promote conservation in accordance with the policies identified in Title 24 and in the City of Los Angeles General Plan Framework. The Certified EIR determined that, should LADWP need to add facilities on-site to meet the needs of the CRA Approved Project, the LADWP is usually able to connect new customers without any disruptions in service to existing customers. Therefore, the Certified EIR determined the CRA Approved Project would not have an adverse impact on the electrical system and no significant impacts related to electricity would occur. No disruptions were caused by the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square foot public park on the project site. During construction, a

new on-site customer service station was placed on the project site in the closed approximately 18,962 square-foot public park.

Development of the Modified Project would increase the existing demand for electricity service in the project area. The Modified Project would continue to be served from the existing power grid. The Modified Project's net increase in electricity consumption would be approximately 2,933,723 kilowatts per year as compared to the CRA Approved Project's net increase of approximately 3,420,493 kilowatts per year. The Modified Project's gross increase in electricity consumption would be approximately 3,708,069 kilowatts per year as compared to the CRA Approved Project's gross increase of approximately 4,194,839 kilowatts per year. Therefore, Modified Project's net and gross increase in electricity consumption is less than the CRA Approved Project's net and gross increase in electricity consumption.

For purposes of assessing the Modified Project's consistency with the LADWP's future projections, the Modified Project's increase in electricity consumption was compared to the LADWP's future projections contained in the 2015 Power IRP. The electricity consumption as a result of operation of the Modified Project would represent approximately 0.015 percent of the LADWP's existing supply of electricity per year to the City and, therefore, would be within the LADWP's existing supply of 25 million megawatthours (MWh) of electricity per year to the City as of 2015. Additionally, while the Modified Project would consume approximately 2,933,723 net kilowatts per year of electricity, the Modified Project would consume 486,770 kilowatts per year of electricity less than the CRA Approved Project. Thus, the Modified Project's increase in electricity consumption is less than the CRA Approved Project's increase in electricity consumption.

In addition, no further improvements to the electrical system serving the project site or surrounding area are anticipated to be required as a result of the Modified Project, as no disruptions were caused by the construction of the vacant 22-story, approximately 250-foot high mixed-use building and closed approximately 18,962 square-foot public park on the project site and a new on-site customer service station was already placed on the project site in the closed approximately 18,962 square-foot public park. Therefore, it is estimated that the increase in electrical demand due to the Modified Project would not have an adverse impact on its electrical system, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the energy resources impacts identified in the Certified EIR for the CRA Approved Project.

The Modified Project would also implement Regulatory Compliance Measure CM I.3-1, which ensures compliance with the 2010 L.A. Green Code for all existing construction to remain on the project site, and compliance with the 2013 version of the L.A. Green Code for any additional construction activities necessary for the Modified Project. Therefore, the energy resources impacts as a result of operation of the Modified Project would be less than significant. While impacts upon regional energy resources are expected to be less than significant, the Planning Department imposes standard measures for all new projects to further reduce project impacts and promote conservation efforts. Therefore, with implementation of regulatory compliance measure CM I.3-1, the Modified Project would exceed Title 24 energy efficiency requirements and further reduce demand for

electricity. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, no significant impacts related to electricity would occur due to the Modified Project. In addition, the Modified Project's increase in electricity consumption is less than the CRA Approved Project's increase in electricity consumption. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during operation.

Like the Modified Project, no significant impacts related to electricity would occur due to the No Automated Steel Parking Structure Alternative and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy resources during operation.

(b) Natural Gas

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon natural gas during operation. The Certified EIR determined since the CRA Approved Project is located in an area already served by existing natural gas infrastructure, the CRA Approved Project would not require extensive infrastructure improvement to serve the project site. Thus, the Certified EIR concluded impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment.

The Modified Project would not substantially increase the demands for natural gas service in the project area identified in the Certified EIR for the CRA Approved Project. The Modified Project's net natural gas demands are estimated to be approximately 1,217,614 cubic feet (cf) per month and the Modified Project's gross natural gas demands are estimated to be approximately 1,299,478 cubic feet (cf) per month. The CRA Approved Project's was estimated to have a net increase of approximately 1,286,368 cubic feet (cf) per month and gross increase of approximately 1,368,232 cubic feet (cf) per month. Therefore, the Modified Project's net and gross increase in natural gas consumption is less than the CRA Approved Project's net and gross increase in natural gas consumption.

Natural gas for the project site is provided by SoCal Gas (SCG) and the natural gas consumption as a result of operation of the Modified Project is within the planned projections for natural gas in the area served by SCG. Furthermore, while the Modified Project would consume approximately 1,299,478 cubic feet (cf) per month, the Modified Project would consume 68,754 cubic feet (cf) per month less than the CRA Approved Project. Thus, the Modified Project's increase in natural gas consumption also would be less than the CRA Approved Project's increase in natural gas consumption.

Additionally, the Certified EIR stated the CRA Approved Project's impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. No improvements to the natural gas infrastructure serving the project site or surrounding area were required during construction of the vacant 22-story, approximately 250-foot high mixed-use building and

closed approximately 18,962 square-foot public park on the project site. As such, no improvements to the existing natural gas infrastructure serving the project site or surrounding area are anticipated to be required as a result of the Modified Project. Therefore, the Modified Project's impacts associated with natural gas resources would therefore be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the natural gas resources impacts identified in the Certified EIR for the CRA Approved Project.

Further, the Modified Project would implement Regulatory Compliance Measure CM I.3-1, which ensures compliance with the 2010 L.A. Green Code for all existing construction to remain on the project site, and compliance with the 2013 version of the L.A. Green Code for any additional construction activities necessary for the Modified Project. Therefore, the natural gas consumption impacts as a result of operation of the Modified Project would not substantially increase the natural gas consumption impacts identified in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's increase in natural gas consumption is less than the CRA Approved Project's increase in natural gas consumption. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to natural gas during operation.

Like the Modified Project, the No Automated Steel Parking Structure's impacts associated with natural gas resources would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to natural gas during operation.

(3) Cumulative

(a) Electricity

The Certified EIR determined that, while the CRA Approved Project and the related projects may require construction of additional distribution facilities, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code, which would further reduce cumulative energy needs. The Certified EIR concluded cumulative impacts on electricity service would be less than significant.

The total electricity consumption by the Modified Project and related projects would be approximately 179,584,542.3 kilowatts per year, which would be less than the total electricity consumption by the CRA Approved Project and related projects (from 4,024,012,576 kilowatts per year to 179,584,542.3 kilowatts per year). Thus, the cumulative total electricity consumption by the Modified Project and the related project would not substantially increase the cumulative electricity resources impacts identified in the Certified EIR for the CRA Approved Project. While the Modified Project and the related projects would increase electricity consumption approximately 179,584,542.3 kilowatts per year, the electricity consumption as a result of operation of the Modified Project and

the related projects would be within the LADWP's existing supply of 25 million megawatthours (MWh) of electricity per year to the City as of 2015.

Furthermore, the analysis of the Modified Project's impacts to electricity concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative electricity demands will be less than the CRA Approved Project's contribution to cumulative electricity demands because, the electricity demands associated with the Modified Project are less than the CRA Approved Project's electricity demands. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to electricity service, and the Modified Project would serve to further reduce those impacts.

The cumulative effect of the Modified Project and related projects may require near term and/or future additions to the distribution system capacity. Any required near term and/or future additions to the distribution system will be carried out by LADWP and each addition will be completed subject to LADWP review and approval.

In addition, consistent with the analysis in the Certified EIR for the CRA Approved Project, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy conservation standards and other energy conservation programs on the local level will further reduce cumulative energy demands.

Therefore, cumulative impacts to electricity service would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to electricity service.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts to electricity service would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to electricity service.

(b) Natural Gas

The total natural gas consumption by the CRA Approved Project and related projects would be 31,680,654 cf per month. The Certified EIR stated that the SCG continuous increases in demand and compliance with Title 24 of the California Administrative Code would result in less-than-significant cumulative impacts on natural gas services.

The total natural gas consumption by the Modified Project and related projects would be 64,634,455.5 cf per month. While the total natural gas consumption by the Modified

Project and related projects would be more than the total natural gas consumption analyzed in the Certified EIR for the CRA Approved Project and related projects, as a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Further, the natural gas consumption as a result of operation of the Modified Project and the related projects is within the planned projections for natural gas in the area served by SCG.

Furthermore, the analysis of the Modified Project's impacts to natural gas concluded that the Modified Project would result in a less than significant impacts, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. In addition, the Modified Project's contribution to cumulative natural gas demands will be less than the CRA Approved Project's contribution to cumulative natural gas demands because, the natural gas demands associated with the Modified Project are less than the CRA Approved Project's natural gas demands. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to natural gas service, and the Modified Project would serve to further reduce those impacts.

In addition, each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. As such, it is anticipated the Modified Project and the related projects in the vicinity would likely also be accommodated by SCG, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the cumulative natural gas resources impacts identified in the Certified EIR for the CRA Approved Project. Additionally, consistent with the analysis in the Certified EIR for the CRA Approved Project, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Therefore, cumulative impacts upon natural gas resources and infrastructure would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to natural gas service.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts upon natural gas resources and infrastructure would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to natural gas service.

d. Solid Waste Cumulative

The Certified EIR determined the total solid waste generation by the CRA Approved Project and the related projects would be approximately 16.5 tons per year. This equated to approximately 0.045 tons per day, which was significantly less than 0.01 percent of the Sunshine Canyon and Chiquita Canyon landfills' daily excess permitted intake capacity.

Therefore, the Certified EIR concluded the CRA Approved Project and the related projects would result in less than significant cumulative impacts on solid waste.

Implementation of the Modified Project in conjunction with the related projects, would increase regional demands on landfill capacity. The total solid waste generation by the Modified Project and the related projects would be approximately 39,719 tons per year. This equates to approximately 109 tons per day, which would be more than the cumulative solid waste tons per day generated by the CRA Approved Project and its related projects (from 0.045 tons to 109 tons). However, the generation rates used for the CRA Approved Project were different and less conservative than the generation rates used for the Modified Project. Nevertheless, the Modified Project and the related project's 109 tons per day is less than 0.01 percent of the Sunshine Canyon and Chiquita Canyon landfills' daily excess permitted intake capacity.

As with the CRA Approved Project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. In addition, the Modified Project's contribution to cumulative solid waste impacts during operation is less than the CRA Approved Project's contribution to cumulative solid waste impacts during operation because the solid waste impacts associated with the Modified Project's operation are less than the CRA Approved Project's solid waste impacts during operation based on the more conservative generation rates used for the Modified Project. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to solid waste, and the Modified Project's reduction in the solid waste impacts during construction would serve to further reduce those impacts. Since there is currently adequate capacity to accommodate the cumulative disposal needs of the Modified Project and related projects, and the Modified Project would result in less operational waste than the CRA Approved Project, cumulative impacts with respect to solid waste would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to solid waste.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative cumulative impacts with respect to solid waste would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts relevant to solid waste.

2. Reference

For a complete discussion of Public Utilities (Water, Wastewater, Energy, Cumulative) see Sections IV.I Public Utilities and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

I. Public Services

1. Description

a. Fire Protection (Construction)

The Certified EIR concluded the CRA Approved Project would result in less-thansignificant impacts related to increase demands upon Fire Department services during the construction period. The Certified EIR noted that the CRA Approved Project would implement good housekeeping procedures by the construction contractors and the work crews to minimize the potential for accidental onsite fire hazards.

The limited additional construction required for the Modified Project would not be expected to tax firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. In addition, the Modified Project would implement Certified EIR Code-Required Measures J.1.2-1, J.1.2-2, and J.1.2-6 through J.1.2-11, which are now Regulatory Compliance Measures, and ensure fire protection measures are achieved during the construction period, and would further reduce impacts related to fire protection services during construction. In addition, consistent with the CRA Approved Project, good housekeeping procedures would be implemented during the additional construction required for the Modified Project, as provided for in Project Design Feature IV.J-1, and would include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Therefore, construction-related impacts to fire protection services as a result of the Modified Project would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection services during construction of the Modified Project.

Like the Modified Project, construction-related impacts to fire protection services as a result of the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection services.

b. Recreation and Parks

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts upon parks and recreational facilities. The Certified EIR stated because the proposed on-site recreational and open space amenities would be open to the residents of the CRA Approved Project, this feature would help alleviate the City's existing substandard provision of parkland and recreational facilities. The Certified EIR concluded if and to the extent the proposed onsite recreational and outdoor facilities do not fully satisfy the requirements of the Quimby Act, the CRA Approved Project applicant

would be required to pay Quimby fees to the City, to satisfy the balance of its obligations under the Quimby Act.

Based on the City General Plan ratio, the net increase of the Modified Project would generate a need for 2.8 acres of public parkland in the Redevelopment Area and the gross increase of the Modified Project would generate a need for 2.9 acres of public parkland in the Redevelopment Area. For comparative purposes, the Modified Project reduces the amount of acres of public parkland needed in the Redevelopment Area as compared to the CRA Approved Project's public parkland need (from 3.0 acres to 2.9 acres).

The Modified Project would also slightly decrease the size of the on-site public park (from 21,177 square feet to 18,962 square feet) as compared to the CRA Approved Project. The Modified Project's park would be approximately 0.4 acres. Additionally, the Modified Project's need for public parkland would be less than the need for the CRA Approved Project (from 3.0 acres to 2.9 acres), and the Modified Project's recreation and park facilities serving the Redevelopment Area are greater and larger (from 7 facilities and 3.27 acres to 8 facilities and 7.37 acres) than the CRA Approved Project. Of the 2.9 acres of public parkland needed in the Redevelopment Area for the Modified Project, the Modified Project itself provides 0.4 acres, approximately 14 percent of the total public parkland needed, and open space amenities.

Compared to the CRA Approved Project, the proposed Modified Project would provide approximately 35,234 square feet of open space, (including the 18,962 square-foot public park), which is an increase from the 30,900 square feet of open space provided as part of the CRA Approved Project. Because the proposed on-site recreational and open space amenities would be open to the residents of the Modified Project, this feature would help alleviate the City's existing substandard provision of parkland and recreational facilities. The on-site recreational amenities would help reduce Modified Project-related impacts by providing on-site facilities that future residents may use in lieu of public parks.

Like the CRA Approved Project, if and to the extent that the proposed onsite recreational and outdoor facilities for the Modified Project do not fully satisfy the requirements of the Quimby Act and Zone Change Park Fee, the Applicant would pay fees to the City to satisfy the balance of its obligations under the Quimby Act and the Zone Change Park Fee. Therefore, the provision of the onsite recreational and outdoor facilities, together with the payment of Quimby fees or other applicable fees (see Certified EIR Code-Required Measure MM IV.J.4-1, which is now a Regulatory Compliance Measure), would ensure that the Modified Project's impact upon parks and recreational facilities is less than significant because the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for the parks department or 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. Moreover, because the Modified Project generates fewer residents than the CRA Approved Project, the Modified Project's public parkland need is less than the CRA Approved Project's public parkland need. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new

significant environmental effects or a substantial increase in the severity of previously identified significant effects related to recreation and parks.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact upon parks and recreational facilities is less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to recreation and parks.

c. Schools (Operation)

The Certified EIR concluded that the CRA Approved Project's operational impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement Certified EIR Mitigation Measure MM IV.J-3.2, which ensures the CRA Approved Project applicant shall pay all applicable school fees to the LAUSD to offset the impact of additional student enrollment at schools serving the project area. As compared to the CRA Approved Project, because the Modified Project would result in a decrease in dwelling units and commercial space, the potential number of students generated by the Modified Project would be the same or reduced from the CRA Approved. In addition, similar to the CRA Approved Project, the Modified Project would also implement Certified EIR Mitigation Measure MM IV.J-3.2 (now Regulatory Compliance Measure CM IV.J-3.2) to ensure the Modified Project Applicant shall pay all applicable school fees. Thus, the potential for the Modified Project to impact school facilities and services will be the same or reduced under the Modified Project as compared to the Certified EIR, and would remain less than significant with the implementation of Regulatory Compliance Measure CM IV.J-3.2. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact to school facilities and services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools.

d. Other Public Facilities (Libraries)

The Certified EIR concluded that the CRA Approved Project's impacts to library services would be less than significant. As compared to the CRA Approved Project, the Modified Project would result in a decrease in dwelling units, commercial space, and public park space and accordingly the demand for library services generated by the Modified Project would be the same or reduced from the CRA Approved Project. Therefore, the Modified Project's impacts to library services would remain less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to library services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts to library services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to library services.

e. Cumulative

(1) Police Impacts

The Certified EIR determined that demand for increased police services due to the related projects would be funded via existing mechanisms (e.g., sales taxes, government funding). The Certified EIR also stated the CRA Approved Project and the related projects would be subject to Los Angeles Police Department (LAPD) review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to address police protection service demands adequately. Therefore, the Certified EIR concluded cumulative impacts on police protection services would be less than significant.

Similar to the CRA Approved Project, tor the Modified Project, it is anticipated that the realized demand for increased policing services would be funded via existing mechanisms (e.g., sales taxes, government funding) to which the Modified Project and related projects would contribute. In addition, consistent with the analysis in the Certified EIR for the CRA Approved Project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to address police protection service demands adequately, similar to the Modified Project. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. In addition, the Modified Project and most of the related projects are infill development, which would replace older and less secure buildings and facilities with newer development containing modern security and monitoring features, as well as new uses and residents that would revitalize the Hollywood Redevelopment Area. Ongoing revitalization efforts would help reduce the cumulative crime impacts in the Hollywood Area, as the revitalization efforts would provide an opportunity for people engaged in normal everyday activity to observe the space around them. In addition, the Modified Project and the related projects would improve the natural surveillance system consistent with the Crime Prevention Through Environmental Design City of Los Angeles "Design Out Crime" Guidelines (Design Out Crime Guidelines). Further, the LAPD monitors the need for police services and proposes appropriate service enhancements through the yearly budgetary process.

Furthermore, the analysis of the Modified Project's impacts to police services concluded that the Modified Project would result in less than significant impacts with mitigation incorporated, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative impacts on police services will be the same or less than the CRA Approved Project's contribution to cumulative impacts on police services because, the impacts on police services associated with the Modified Project are the same or less than those of the CRA

Approved Project. In addition, and as with the Modified Project, the related projects would be expected to consult and submit a diagram of the respective properties to the Los Angeles Police Department's Crime Prevention Section prior to any Certificate of Occupancy in order to ensure impacts to police services would be mitigated. As such, when combined with the related projects, the Modified Project and the related projects would not significantly impact police services. Therefore, cumulative impacts on police protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on police services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on police protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on police services.

(2) Fire Protection Impacts

The Certified EIR stated the CRA Approved Project and each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City in order to mitigate fire protection impacts adequately. Therefore, the Certified EIR for the CRA Approved Project concluded cumulative impacts on fire protection services would be less than significant.

Consistent with the CRA Approved Project, each of the Modified Project's related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to mitigate fire protection impacts adequately. Furthermore, the analysis of the Modified Project's impacts to fire protection services concluded that the Modified Project would result in less than significant impacts, which is consistent with the conclusion for the CRA Approved Project provided in the Certified EIR. Further, the Modified Project's contribution to cumulative impacts on fire protection services will be less than or the same as the CRA Approved Project's contribution to cumulative impacts on fire protection because the impacts on fire protection associated with the Modified Project are less than or the same as those of the CRA Approved Project. In addition, and as with the Modified Project, each of the related projects would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to mitigate fire protection impacts adequately. As such, when combined with the related projects, the Modified Project and the related projects would not significantly impact fire protection services. Therefore, cumulative impacts on fire protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on fire protection services.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on fire protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on fire protection services.

(3) Recreation and Parks Impacts

The Certified EIR for the CRA Approved Project concluded, with the mandatory payment of the Quimby or other applicable fees, cumulative recreation and park impacts would be less than significant. The Modified Project's new residents would constitute approximately 3.5 percent of the cumulative demand for recreation and parks and the Modified Project would provide approximately 35,234 square feet of open space and additional recreational opportunities. Furthermore, similar to the Modified Project, the related projects that include residential units would be required to pay the applicable Quimby fees or other applicable parks and recreation fees, and/or would incorporate park and recreational facilities on-site. With the mandatory payment of the Quimby or other applicable fees by the residential related projects, cumulative parks and recreation impacts would be reduced to a less than significant level, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Further, the Modified Project's contribution to cumulative impacts on recreation and parks will be less than the CRA Approved Project's contribution to cumulative impacts on recreation and parks because, the impacts on recreation and parks associated with the Modified Project are less than those of the CRA Approved Project. The Certified EIR concluded that the CRA Approved Project would result in less than significant cumulative impacts to recreation and parks, and the Modified Project would serve to further reduce those impacts. Therefore, through compliance with regulatory requirements, the Modified Project and the related projects' associated cumulative impact on parks and recreational facilities would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on recreation and parks.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's cumulative impacts on parks and recreational facilities would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to cumulative impacts on recreation and parks.

2. Project Design Features

The following Project Design Feature is relevant to Public Services (Fire Protection):

Project Design Feature IV.J-1: Good housekeeping procedures would be implemented during the additional construction required for the Modified Project and would include: the maintenance of mechanical equipment in good operating condition; careful storage of

flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

3. Reference

For a complete discussion of Public Services see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

VIII. Environmental Impacts found to be less than significant and further reduced with Mitigation

- **A.** Air Quality (Construction)
 - 1. Description
 - a. Regional Emissions

The construction emissions estimated in the Certified EIR for the CRA Approved Project would not exceed the regional emissions thresholds recommended by the SCAQMD. As such, construction impacts of the CRA Approved Project would have been less than significant. Nevertheless, Certified EIR Mitigation Measure IV.B-1 was included in the Certified EIR to further reduce PM10 and PM2.5 emissions.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The two sets of construction activities would not overlap. For the Modified Project's additional construction activities, it is anticipated that the emissions from the installation and retrofitting for the new automated steel parking structure and interior building renovations would occur during an approximate 4-month construction timeline. The Modified Project's construction emissions from the additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations would be below the SCAQMD's thresholds of significance for all six criteria pollutants. Furthermore, implementation of Regulatory Compliance Measures CM.B-1 through CM.B-4, which ensure compliance with SCAQMD District Rules and Sections 2485 in Title 13 and Section 93115 in Title 17 of the California Code of Regulations would further reduce the Modified Project's construction emissions from the additional construction activities. SCAQMD Rule 403 mandates the implementation of BMPs to control and limit fugitive dust emissions. SCAQMD Rule 1113 established minimum VOC content standards for architectural coatings and required contractors to close VOC containers when not in use. CCR Section 2485 in Title 13 prohibits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction when equipment is not in use for more than five minutes. CCR Section 93115 in Title 17 specifies fuel and fuel additive requirements and emission standards for the operation of any stationary, diesel-fueled, compressionignition engines. Compliance with these regulatory measures are mandated by existing laws and will be adhered to by all contractors.

The portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's additional construction activities. Therefore, to determine the Modified Project's peak regional construction emissions, the estimated peak daily construction emissions of the Modified Project's additional construction activities were compared to the estimated peak daily construction emissions of the CRA Approved Project. This comparison evaluates whether the peak daily construction emissions of the Modified Project's additional construction activities would exceed the peak daily construction emissions of the CRA Approved Project. The Modified Project's additional construction activities' peak daily construction emissions would be fewer than the CRA Approved Project's peak daily construction emissions for all criteria pollutants. As a result, the portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project is the peak day of emissions to compare to applicable thresholds. As discussed above, the CRA Approved Project's peak daily construction emissions were determined to be less than significant in the Certified EIR for the CRA Approved Project.

Therefore, based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project's additional construction activities, and the fact that the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction emissions on a given day, the construction emissions impacts as a result of construction of the Modified Project would not substantially increase the construction emissions impacts for construction of the CRA Approved Project. Furthermore, implementation of Regulatory Compliance Measures CM.B-1 through CM.B-4, which ensure compliance with SCAQMD District Rules and Sections 2485 in Title 13 and Section 93115 in Title 17 of the California Code of Regulations would further reduce the Modified Project's construction emissions from the additional construction activities. Certified EIR Mitigation Measure IV.B-1 would be implemented as Regulatory Compliance Measure CM.B-1, during the additional construction activities of the Modified Project. Accordingly, the Modified Project's construction emissions would be less than significant and within the scope of the impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction emissions.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction emissions would be less than significant and within the scope of the impacts analyzed for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction emissions.

b. Localized Air Quality Impacts

The Certified EIR determined that on-site emissions generated by the CRA Approved Project during the different phases of construction were below the established SCAQMD localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5} at a receptor distance of 25 meters.

Therefore, the localized construction impacts of the CRA Approved Project were determined to be less than significant. Nevertheless, Certified EIR Mitigation Measure IV.B-1 was included in the Certified EIR to further reduce PM10 and PM2.5 emissions.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Because the portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's additional construction activities, evaluation of both sets of construction activities enables the determination of the Modified Project's on-site peak daily construction emissions.

On-site emissions generated by the Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations would not exceed the established SCAQMD localized thresholds for NOx, CO, PM₁₀, and PM_{2.5} at a receptor distance of 25 meters. The portion of the Modified Project's construction that includes the same construction activities as the CRA Approved Project would not overlap with the Modified Project's additional construction activities. Therefore, to determine the Modified Project's on-site peak localized construction emissions, the estimated localized on-site peak daily construction activities were compared to the estimated localized on-site peak daily construction emissions of the CRA Approved Project. This comparison evaluates whether the peak daily construction emissions of the Modified Project's additional construction activities would exceed the peak daily construction emissions of the CRA Approved Project.

The Modified Project's additional construction activities' peak daily construction emissions for all criteria pollutants analyzed with the exception of CO would be fewer than the CRA Approved Project's peak daily construction emissions. CO emissions from the Modified Project's additional construction activities would be slightly higher (by approximately 0.53 lbs/day) than the CRA Approved Project's localized emissions because equipment associated with the construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations are conservatively assumed to operate concurrently. Nevertheless, the slightly higher CO emission of the Modified Project's additional construction activities are well below the SCAQMD's localized thresholds of significance for CO emissions (900.8 lbs/day) with the marginally higher emissions of 0.53 lbs/day representing approximately 0.06 percent of the pertinent threshold. Therefore, the Modified Project's additional construction activities would not involve a substantial increase in the severity of previously identified significant effects related to air quality.

Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project, and the fact that the Modified Project's construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction emissions on a given day, the construction emissions impacts as a result of construction of the Modified

Project would not substantially increase the localized air quality impacts for construction emissions of the CRA Approved Project. Thus, the Modified Project's on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 25 meters. Accordingly, the localized air quality impacts resulting from construction emissions associated with the Modified Project would be less than significant and within the scope of impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized air quality impacts resulting from construction emissions.

Like the Modified Project, the localized air quality impacts resulting from construction emissions associated with the No Automated Steel Parking Structure would be less than significant and within the scope of impacts analyzed for the CRA Approved Project and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to localized air quality impacts resulting from construction emissions.

2. Project Design Features

No Project Design Features are proposed for Air Quality (Construction).

3. Mitigation Measure

Certified EIR Mitigation Measure IV.B-1: All construction-related work orders shall specify that any clearing, grading, earth moving, or excavation activities shall be performed pursuant to the requirements under SCAQMD Rule 403.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impact to Air Quality (Construction), mitigation measures have nonetheless been incorporated which further reduce these less-than-significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the construction emissions estimated in the Certified EIR for the CRA Approved Project would not exceed the regional or localized emissions thresholds recommended by the SCAQMD. As such, construction impacts of the CRA Approved Project are less than significant. Similarly, the construction emissions estimated in the Modified Project and the No Automated Steel Parking Structure Alternative would not exceed the regional or localized emissions thresholds recommended by the SCAQMD. As such, construction impacts of the Modified Project and the No Automated Steel Parking Structure Alternative are less than significant. As compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the

severity of previously identified significant effects related to construction emissions. However, the Modified Project and the No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's less than significant impacts.

6. Reference

For a complete discussion of Air Quality (Construction) see Sections IV.B Air Quality and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Noise

- 1. Description
 - **a.** Operational Impacts (Noise Compatibility Standards for Multi-Family Residential)

Based on the inclusion of double-pane windows in the CRA Approved Project to reduce exterior-to-interior noise, the Certified EIR concluded operational noise impacts associated with interior spaces would be less than significant. As set forth in the Certified EIR, future noise levels on the project site would continue to be dominated by vehicular traffic on Sunset Boulevard and Gordon Street. The ambient noise levels that were recorded in the Certified EIR were between 60 and 68 dBA Leq. Lmax noise levels of 73-83 dBA were also recorded at these locations. Based on the City's Land Use Noise Compatibility Guidelines, the Certified EIR concluded that the CRA Approved Project's impacts related to exterior ambient noise would be significant and unavoidable for future residents of the CRA Approved Project.

Since certification of the Certified EIR for the CRA Approved Project, the Supreme Court of California unanimously determined that CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents. (*California Building Industry Association v Bay Area Air Quality Management District*, S213478, Opinion, p. 14). However, the Supreme Court of California did find that impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. Accordingly, to provide a comparison to the analysis in the Certified EIR the discussion below provides an analysis of the impact of the existing noise conditions on future residents of the Modified Project for informational purposes only and also provides a discussion of whether the Modified Project would exacerbate existing environmental noise conditions.

The Modified Project would contain exterior windows with double-pane glass and be designed and constructed to reduce interior noise levels for future Modified Project residents to acceptable noise levels in accordance with the Noise Element and CEQA regulations. In addition, the Modified Project would implement Regulatory Compliance

Measure CM F-3, which ensures an acceptable interior noise environment under Noise Insulation Standards of Title 24 of the California Code Regulations and requires submittal of an acoustical report that demonstrates interior noise levels are no greater than 45 dBA CNEL prior to the issuance of building permits. Double pained windows and implementation of regulatory compliance measure CM F-3 is consistent with Certified EIR Mitigation Measure Impact IV.F-3, which requires that all exterior windows within the Modified Project be constructed with double-pane glass and uses exterior wall construction or allows the Applicant to retain an acoustical engineer to provide evidence that alternative sound insulation would mitigate interior noise levels below 45 dBA CNEL. With regulatory compliance measure CM F-3 and Certified EIR Mitigation Measure Impact IV.F-3, the Modified Project's operational noise impacts on future residents associated with locations for interior spaces would be less than significant.

Similar to the CRA Approved Project, future noise levels at the project site would continue to be dominated by vehicular traffic on Sunset Boulevard and Gordon Street for the Modified Project. The future noise levels from vehicular traffic on Sunset Boulevard and Gordon Street in the vicinity of the project site would range from 56.7 dBA to 72.0 dBA. Additionally, the current ambient noise levels generated in the vicinity of the Modified Project range from 60.9 dBA to 75.7 dBA Leq. Thus, similar to the CRA Approved Project, the Modified Project would expose future residents to "normally unacceptable" noise levels for multi-family uses. Therefore, the Modified Project would conflict with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment.

The increase in exterior noise levels resulting from future roadway noise levels with the Modified Project would be between 0.5 dBA and 1.4 dBA. Accordingly, the increase in future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold. In addition, the Noise/Land Use compatibility classifications from the Noise Element of the General Plan associated with the 2015 roadway noise levels would not change with the development of the Modified Project. Therefore, the Modified Project would not exacerbate existing noise levels in such a way as to modify the Noise/Land Use compatibility classifications of the Noise Element of the General Plan. Accordingly, the Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project.

Therefore the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project would not substantially increase impacts identified

in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with the operation of the Modified Project.

Like the Modified Project, the impact regarding the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact for the No Automated Steel Parking Structure Alternative and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with operation.

b. Operational Impacts (Stationary Noise)

The Certified EIR concluded the CRA Approved Project's stationary and mobile source operational impacts would be less than significant.

(1) Noise from the HVAC Equipment

The Certified EIR stated rooftop mechanical HVAC equipment would be installed for the CRA Approved Project. As such, the HVAC noise levels were calculated based on the distances from the rooftop mechanical HVAC equipment to the nearest sensitive receptors. The Modified Project would use similar mechanical HVAC equipment as the CRA Approved Project, which would be located on the rooftop of the residential tower and on the ground floor in the public park. Therefore, the distances utilized for the Modified Project's HVAC noise levels were calculated based on the distances from the mechanical HVAC equipment on the rooftop and in the public park to the nearest sensitive receptors. This equipment would be shielded and appropriate noise muffling devices would be installed to reduce noise levels that affect nearby noise-sensitive uses. The design of the on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. The Modified Project's resulting HVAC noise levels at the nearest sensitive receptors would not exceed the existing ambient noise levels, by more than 3 dBA, which is in compliance with the regulations under Section 112.02 of the LAMC and the L.A. CEQA Thresholds Guide, Additionally, similar to the CRA Approved Project, the Modified Project would incorporate Certified EIR Mitigation Measure MM IV.F-5.1, which would ensure HVAC units are oriented to the east away from the residential neighborhood. This mitigation measure would further reduce the Modified Project's operational noise impacts associated with locations off-site. Thus, the operational noise impacts associated with the HVAC equipment would be less than significant. Thus, the Modified Project would not substantially increase the CRA Approved Project's operational noise impacts associated with the HVAC equipment.

Like the Modified Project, the operational noise impacts associated with the HVAC equipment from the No Automated Steel Parking Structure Alternative would be less than significant and would not substantially increase the operational noise impacts associated with the HVAC equipment.

(2) Noise from the Parking Structure

The Certified EIR determined that noise from the CRA Approved Project's parking structure would be similar to the existing conditions with vehicles parking in the lots north and east of the project site. The Certified EIR stated the parking structure's noise would not increase ambient noise levels at the nearby homes by 3 dBA CNEL or more. The Certified EIR concluded, based on this information, implementation of the CRA Approved Project would not result in a substantial permanent increase in ambient noise levels above future existing ambient noise levels without the CRA Approved Project. As such, operational noise impacts associated with locations off-site would be less than significant.

Similar to the Certified EIR, the Modified Project's parking podium would also generate noise from tires squealing, engines accelerating, doors slamming, car alarms, and people talking during the day and evening when the largest number of retail customers would enter and exit the parking podium. However, these conditions would be slightly different than the conditions in the Certified EIR for the CRA Approved Project because the Modified Project's parking podium is smaller than the CRA Approved Project's parking podium. The CRA Approved Project proposed to develop a five-story, approximately 65-foot podium structure. Compared to the CRA Approved Project, the Modified Project's parking podium would be a four level above-grade, approximately 50-foot podium structure. Thus, similar to the CRA Approved Project, the activities within the parking podium for the Modified Project would not increase ambient noise levels as they would be similar to the current ambient noise levels generated in the vicinity of the Modified Project, which range from 60.9 dBA to 75.7 dBA Leg.

The Modified Project would also include the addition of a new automated steel parking structure located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. Unlike the three levels of subterranean parking and three levels of above-grade parking in the Modified Project's parking podium, the new automated steel parking structure mechanically and precisely stores vehicles. Thus, the automated steel parking structure operates without the need for human management. Therefore, the automated steel parking structure would not generate noise associated with tires squealing, engines accelerating, doors slamming, car alarms, and people talking like traditional garages as cars would be shut off at the garage entry and conveyed via electric mechanisms. The noise anticipated in the new automated steel parking structure would be generated by the pulleys, motors, and mechanical systems. These motors would be entirely enclosed within the new automated parking structure and a transparent wire fence decorated with live green landscaping such as clinging vines or ivy will screen the exterior. A representative noise measurement was taken of an automated steel parking structure that generated a noise level of 58.5 dBA Leg, which is 2.4 dBA below the ambient noise level recorded at street level on Gordon Street (i.e., 60.9 dBA Leg). Thus, the operation

of the Modified Project's automated parking system would not generate a significant noise impact upon adjacent land uses.

Concurrent operations of the Modified Project's parking podium and the new automated steel parking structure would result in a combined noise level between 62.3 and 70.3 dBA Leg. Thus, similar to the CRA Approved Project, the activities within the parking podium and automated steel parking structure for the Modified Project would not increase ambient noise levels by 3 dBA or more as they would be similar to the current ambient noise levels generated in the vicinity of the Modified Project, which range from 60.9 dBA to 75.7 dBA Leg. Additionally, similar to the CRA Approved Project, the Modified Project would also incorporate Certified EIR Mitigation Measure MM IV.F-5.2, which would ensure the parking ramps would be constructed with concrete not metal to prevent tire squealing at turning areas to further reduce impacts. These mitigation measures would further reduce the Modified Project's operational noise impacts associated with locations off-site. Therefore, consistent with the CRA Approved Project, the parking podium and new automated steel parking structure noise would not increase ambient noise levels at the nearby sensitive receptors by 3 dBA or more. Thus, the operational noise impacts associated with the parking podium and new automated steel parking structure would be less than significant and within the impacts concluded in the Certified EIR for the CRA Approved Project. Thus, the Modified Project would not substantially increase the CRA Approved Project's operational noise impacts associated with the parking podium and new automated steel parking structure.

Like the Modified Project, the operational noise impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not substantially increase the CRA Approved Project's operational noise impacts associated with the parking podium and new automated steel parking structure.

(3) Noise from People Utilizing the Modified Project

The Certified EIR for the CRA Approved Project did not analyze noise generated from people utilizing the CRA Approved Project's mixed-use commercial and residential land uses. Due to the mixed-use nature of the Modified Project, noise generated from people utilizing the Modified Project's uses, including the operation of the proposed ground floor commercial uses, the outdoor open spaces on the podium, and the public park have the potential to impact off-site sensitive receptors.

Noise levels from outdoor activities on the podium would be 69 dBA, which is lower than the ambient noise levels along Sunset Boulevard, therefore the noise generated from activities on the podium deck would not increase the ambient noise levels at the street level by 3 dBA or more. Noise impacts from individuals and small gatherings of people on the podium would therefore be less than significant.

In addition, the Modified Project would generate low levels of noise from public utilization of the proposed Gordon Street Park. Gordon Street Park is designed for passive recreational uses and would not accommodate playground equipment, or large contiguous open space areas that would allow for organized field games such as soccer

or baseball. Based on the design and landscaping plan within the park area, activities within the park would be limited to walking dogs, walking, sitting on park benches, and enjoying picnics/barbeques. Conservatively, the maximum utilization of the park is estimated to include up to 60 individuals congregating and utilizing the park area in an informal manner at the same time. Noise generated by the public utilizing the Gordon Street Park would be below the 3 dBA threshold and would not be considered significant.

Based on this information, implementation of the Modified Project would not result in a substantial permanent increase in ambient noise levels above future existing ambient noise levels without the Modified Project. As such, the Modified Project's operational noise impacts associated with locations off-site would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

Like the Modified Project, the No Automated Steel Parking Structure's operational noise impacts associated with locations off-site would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

2. Project Design Features

No Project Design Features are proposed for Noise.

3. Mitigation Measures

Certified EIR Mitigation Measure Impact IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

Certified EIR Mitigation Measure MM IV.F-5.1: The air inlets of HVAC units installed at the project site shall be oriented to the east away from the residential neighborhood to the west of the site.

Certified EIR Mitigation Measure MM IV.F-5.2: Concrete, not metal, shall be used for construction of parking ramps. The interior ramps shall be textured to prevent tire squeal at turning areas.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impacts to Noise (Noise Compatibility Standards and Stationary Noise), mitigation measures have nonetheless been incorporated which

further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project and No Automated Steel Parking Structure Alternative would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise levels for exterior spaces associated with the operation of the Modified Project or and No Automated Steel Parking Structure Alternative.

In addition, regarding stationary noise, the Certified EIR concluded the CRA Approved Project's stationary operational impacts would be less than significant. Similarly, the Modified Project's and No Automated Steel Parking Structure Alternative's stationary operational noise impacts would be less than significant related to noise from HVAC equipment, the parking structure, and from people utilizing the Modified Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to stationary noise.

However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Noise see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Land Use Planning (Consistency with Noise Element of the General Plan)

1. Description

The Certified EIR concluded the CRA Approved Project's operational noise would have a significant and unavoidable impact from a land use compatibility standpoint related to consistency with the Noise Element.

The Modified Project would contain exterior windows with double-pane glass and be designed and constructed to reduce interior noise levels for future Modified Project residents to acceptable noise levels in accordance with the Noise Element and CEQA regulations. In addition, the Modified Project would implement Regulatory Compliance

Measure CM F-3, in Section IV.F Noise of the Draft Supplemental EIR, which ensures an acceptable interior noise environment under Noise Insulation Standards of Title 24 of the California Code Regulations and requires submittal of an acoustical report that demonstrates interior noise levels are no greater than 45 dBA CNEL prior to the issuance of building permits. Therefore, with Regulatory Compliance Measure CM F-3 and Certified EIR Mitigation Measure Impact IV.F-3, the Modified Project's operational noise impacts associated with locations for interior spaces would be less than significant and the Modified Project would be consistent with the City of Los Angeles' land use noise compatibility standards for interior ambient noise during operation of the Modified Project. Therefore, operational interior noise levels for locations on the project site associated with the Modified Project would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project.

For exterior ambient noise, the Certified EIR conclude that the CRA Approved Project would result in significant and unavoidable impacts to future residents of the CRA Approved Project, as the exterior ambient noise levels were in the normally unacceptable and clearly unacceptable CNEL exposure range. Similar to the CRA Approved Project, the Modified Project would expose future residents to "normally unacceptable" noise levels for multi-family uses. Therefore, the Modified Project would conflict with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, consistent with recent CEQA case law (California Building Industry Association v Bay Area Air Quality Management District, S213478, Opinion, p. 14), impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the 3.0 dBA CNEL significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project.

Therefore the anticipated land use conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. Therefore, operational noise levels for locations on the project site associated with the Modified Project would be less than significant and would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the Noise Element of the General Plan.

Like the Modified Project, operational noise levels for locations on the project site associated with the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial

increase in the severity of previously identified significant effects related to consistency with the Noise Element of the General Plan.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning (Consistency with Noise Element of the General Plan)

3. Mitigation Measure

Certified EIR Mitigation Measure Impact IV.F-3: All exterior windows within the Modified Project shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in a significant impact to Land Use Planning (Consistency with Noise Element of the General Plan), mitigation measures have nonetheless been incorporated which further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the potential conflict arising from the Modified Project's inconsistency with the Noise/Land Use compatibility guidelines of the Noise Element of the General Plan would be considered a less than significant impact. As a result, operational noise levels associated with the Modified Project and No Automated Steel Parking Structure Alternative would not substantially increase impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to land use noise compatibility standards.

However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Land Use Planning (Consistency with Noise Element of the General Plan) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Public Services (Fire Protection, Operation)

1. Description

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts during operation of the CRA Approved Project in relation to increased demands upon Fire Department services.

(1) Response Distance and Emergency Access

The nearest fire station to the Modified Project, Fire Station 82, is approximately 0.5 mile from the project site. Due to the location of the Modified Project in an area adequately served by existing fire stations within a 1-mile radius of the project site, response distance would be within Fire Department standards of the maximum 1.0 to 1.5 mile response distance for fire stations with an engine company and truck company. As compared to the CRA Approved Project, the Modified Project would result in a decrease in the on-site residential population, and, therefore, the Modified Project's increase in land use activity and associated fire protection service needs would be the same or less than the CRA Approved Project. Furthermore, the Modified Project's high-rise residential tower would also include automatic fire suppression sprinklers as required by the Fire Code. The presence of automatic fire sprinklers will reduce or slow the spread of fire in a high rise structure, further assisting fire fighters in the event of a fire.

Emergency vehicle access to the Modified project site would continue to be provided from local public roadways. Major roadways adjacent to the project site would continue to provide public and emergency access. The LAFD considers intersections with an LOS of E or F to inhibit emergency response. As discussed in Section IV.K.1, Traffic/Transportation, of the Draft Supplemental EIR, with implementation of Mitigation Measure MM K.1-1, the Gower Street and Sunset Boulevard intersection would operate at LOS D during the P.M. peak hour. Therefore, as with the CRA Approved Project, the Modified Project would not cause the major roadways that provide public and emergency access to operate at LOS E or F during the A.M. or P.M. peak hour and the Modified Project would not inhibit emergency vehicle access with incorporation of traffic mitigation measures. Furthermore, as provided by Regulatory Compliance Measures CM J.2-1 through CM J.2-3, the Modified Project Applicant would be required to ensure firefighting personnel and apparatus access, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department, and submit a Fire Life Safety Resources Management Plan to the City Fire Department. Therefore, the Modified Project would not inhibit emergency vehicle access, and impacts related to emergency access would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to response distance and emergency access during operation of the Modified Project.

Like the Modified Project, impacts related to emergency access for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to response distance and emergency access during operation.

(2) Fire Flow

The Certified EIR concluded based upon fire flow and response criteria, existing fire protection service was considered adequate for the CRA Approved Project. Additionally, for the vacant 22-story, approximately 250 foot high mixed use building and closed approximately 18,962 square foot public park on the project site, a new fire hydrant was installed on Sunset Boulevard as required by the LAFD in order to meet the City's minimum distance from fire hydrants to residential units. Similar to the CRA Approved Project, final fire flow requirements for the Modified Project would be verified during the review and approval process for the Modified Project before a certificate of occupancy is issued. However, it is expected that the fire flow requirements would be adequate for the Modified Project because it is expected that all required improvements to ensure adequate fire flow, including the installation of a new fire hydrant on Sunset Boulevard, were previously conducted. Furthermore, the uses included in the Modified Project are similar to the uses for the CRA Approved Project and reduce the number of dwelling units, reduce the square footage of commercial uses and reduce the size of the park. Thus, the Modified Project is smaller than the CRA Approved Project and, as a result, would require less fire protection services based upon fire flow. Therefore, because the fire protection service was considered adequate based upon the fire flow requirement for the larger CRA Approved Project from four fire hydrants and a new fire hydrant on Sunset Boulevard was subsequently installed, the existing fire protection service, based upon fire flow, would also be considered adequate for the Modified Project.

The Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Additional hydrants, water lines, and the water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the Modified Project. Furthermore, through Regulatory Compliance Measures CM J.2-1 through CM J.2-3, the Modified Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the LAFD Fire Code, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department and submit a Fire Life Safety Resources Management Plan to the City Fire Department. Therefore, with respect to fire flows, fire protection would be adequate and the Modified Project's impact upon fire protection services would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection during operation of the Modified Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact upon fire protection services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to fire protection during operation.

2. Project Design Features

No Project Design Features are proposed for Public Services (Fire Protection, Operation).

3. Mitigation Measure

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and operational right turn lane. Because this improvement requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

4. Finding

Although the Modified Project and No Automated Steel Parking Structure Alternative would not result in significant impact to Public Services (Fire Protection, Operation), mitigation measures have nonetheless been incorporated which further reduce these less than significant environmental effects, as identified in the Draft Supplemental EIR.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts during operation of the CRA Approved Project in relation to increased demands upon Fire Department services. Similarly, the Modified Project and No Automated Steel Parking Structure Alternative would result in less than significant impacts during operation in relation to increased demands upon Fire Department services. As compared to the CRA Approved Project, the proposed Modified Project and No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to Fire Department services. However, the Modified Project and No Automated Steel Parking Structure Alternative would implement the above-described mitigation measure to further reduce the less than significant impacts.

6. Reference

For a complete discussion of Public Services (Fire Protection, Operation) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

IX. Environmental Impacts analyzed in the Supplemental EIR and determined to be less than significant after Mitigation

- A. Geology/Soils
 - 1. Description
 - a. Seismic-Induced Ground Shaking

The Certified EIR stated the project site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. The Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

Because the Modified Project is located on the same project site as the CRA Approved Project, similar to the CRA Approved Project analyzed in the Certified EIR, the project site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. Therefore, development of the Modified Project would expose new residents, employees and visitors of the proposed dwelling units and commercial establishments to potentially significant adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. However, such hazards are inherent to the region and the effects of ground shaking can be mitigated to a less-than-significant level by incorporating proper design and construction methods in conformance with current building codes and engineering practices. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear walls and reinforcements.

The Modified Project, including the additional construction of the new automated steel parking structure, would implement Certified EIR Code Required (Regulatory Compliance) Measure IV.C-2, which ensures consistency with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. In addition to Certified EIR Code-Required Measure IV.C-2, the Modified Project would also implement Certified EIR Mitigation Measure MM IV.C-2.1 and Certified EIR Mitigation Measure MM IV.C-2.2. Certified EIR Mitigation Measure MM IV.C-2.1 ensures the Modified Project would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable.

The CRA Approved Project's Geotechnical Report found splays of the Hollywood Fault zone located approximately 2,500 feet north-northwest of the project site. The project site

is not located within a designated Alguist-Priolo Earthquake Fault Zone or a fault rupture study zone. No known active faults trend through the project site. Since the Certified EIR for the CRA Approved Project, an Alguist-Priolo special study zone was established for the active Hollywood Fault. The closest distance of the Hollywood Fault special study zone to the project site is approximately 700 feet north of the project site's northern property line and the closest mapped active fault trace is approximately 1,200 feet north of the project site's northern property line. The Modified Project's Geotechnical Report concluded that the project site is not located within a special study zone, is not subject to fault rupture, and the issuance of the Seismic Hazard Zone Hollywood Quadrangle Official Map showing the Hollywood Fault being located 1,200 feet north of the project site does not impact the development of the Modified Project. Furthermore, the Hollywood Fault lacks surface fault features and therefore, while capable of producing an earthquake, poses a low hazard risk with respect to seismic-induced ground shaking. Additionally, although the project site is located within 0.24 mile (approximately 1,200 feet) of the active Hollywood Fault, and is close to many other faults on a larger regional level, the potential for seismic hazards is not higher than in other areas of the City of Los Angeles or elsewhere in the region. Such risks have been addressed in the project-specific seismic design and engineering plans for the CRA Approved Project, which the Modified Project would not change.

Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, Modified Project impacts would be less than significant with mitigation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

Like the Modified Project, the No Automated Steel Parking Structure impacts related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking would be less than significant with mitigation and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking.

b. Erosion and Loss of Topsoil

The Certified EIR determined that the CRA Approved Project would result in less-thansignificant impacts with mitigation with respect to erosion and topsoil.

The Modified Project does not have the potential to result in erosion of soils during site preparation and construction activities, as the Modified Project's additional construction would only require minimal on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Nevertheless, similar to the CRA Approved Project, the Modified Project would implement Certified EIR Mitigation Measure MM IV.C-5, which ensures appropriate erosion control

and drainage devices shall be incorporated, such as interceptor terraces, berms, veechannels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, construction impacts related to soil erosion would be less than significant.

Like the Modified Project, construction impacts related to soil erosion for the No Automated Steel Parking Structure would be less than significant.

c. Expansive Soils

The Certified EIR stated with adherence to the geotechnical engineering recommendations provided in the CRA Approved Project's Geotechnical Report and the mitigation measures identified in Section IV.C Geology and Soils of the Certified EIR for the CRA Approved Project, impacts with respect to expansive soils would be less than significant. Therefore, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts associated with expansive soils with incorporation of mitigation measures.

The Modified Project would include a new automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. With the geotechnical modification proposed for the Modified Project described in detail in Section IV.C, Geology and Soils, of the Draft Supplemental EIR, the applied pressure increases at all footings as a result of the automated steel parking structure would comply with the recommendations stated in the Modified Project's Geotechnical Report and will remain consistent with the recommended bearing pressure maximum of provided in the CRA Approved Project's Geotechnical Report and associated addenda.

In addition, the Modified Project would implement Certified EIR Code-Required (Regulatory Compliance) Measure IV.C-2, Certified EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2. Regulatory Compliance Measure Certified EIR Code-Required Measure IV.C-2 ensures the Modified Project would be designed and constructed in accordance with the requirements outlined in the 2011 City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations and fills. Certified EIR Mitigation Measure MM IV.C-2.1 ensures the Modified Project would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. With adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report, Certified EIR Code-Required Measure IV.C-2, Certified

EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2, the Modified Project's impacts with respect to expansive soils would be less than significant, consistent with the Certified EIR's conclusions for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

Like the Modified Project, with adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report, Certified EIR Code-Required Measure IV.C-2, Certified EIR Mitigation Measure MM IV.C-2.1, and Certified EIR Mitigation Measure MM IV.C-2.2, the No Automated Steel Parking Structure Alternative's impacts with respect to expansive soils would be less than significant and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

d. Groundwater

The Certified EIR stated, based on borings taken by GeoDesign, Inc. in November 2006, the highest groundwater level reported was at an elevation of 312.5 feet, approximately 49 feet bgs, which is below the lowest basement level of the CRA Approved Project. The Certified EIR concluded, with adherence to the geotechnical engineering recommendations provided in the CRA Approved Project's Geotechnical Report and mitigation measures identified in Section IV.C Geology and Soils of the Certified EIR, the CRA Approved Project would result in less than significant impacts with mitigation related to the groundwater table.

The Modified Project is located on the same project site as the CRA Approved Project. The Modified Project would result in the addition of an automated steel parking structure that is proposed to be located above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. As impacts to geology and soils are site-specific and the Modified Project and CRA Approved Project are located on the same project site, the Modified Project utilizes the same borings taken for the CRA Approved Project. As such, based on borings taken by GeoDesign, Inc. in November 2006, the highest groundwater level reported was at an elevation of 312.5 feet, approximately 49 feet bgs. Based on the data from these borings, the groundwater level at the project site is approximately nine to ten feet below the lowest basement level of the vacant 22-story, approximately 250-foot high mixed use building and closed approximately 18,962 square-foot public park on the project site and is not anticipated to rise significantly during the lifetime of the Modified Project. The structural modifications to the existing reinforced concrete structure associated with the automated steel parking structure, would not extend beyond the depth of existing footings. Thus, the structural modifications associated with the automated steel parking structure would not extend the footings into the groundwater table. In addition, the Modified Project would implement Certified EIR Mitigation Measure MM IV.C-2.2. Certified EIR Mitigation Measure MM IV.C-2.2 requires the applicant to ensure

geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. With adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report and Certified EIR Mitigation Measure MM IV.C-2.2, the Modified Project's impacts with respect to groundwater would be less than significant, consistent with the Certified EIR's conclusions for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to the groundwater table.

Like the Modified Project, with adherence to the geotechnical engineering recommendations provided in the Modified Project's Geotechnical Report and Certified EIR Mitigation Measure MM IV.C-2.2, the No Automated Steel Parking Structure Alternative's impacts with respect to groundwater would be less than significant and would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to the groundwater table.

2. Project Design Features

No Project Design Features are proposed for Geology and Soils.

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.C-2.1: The Modified Project shall be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative or as they-may be amended by request of the City.

Certified EIR Mitigation Measure MM IV.C-2.2: The Modified Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable or as they may be amended by request of the City.

Certified EIR Mitigation Measure MM IV.C-5: Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Geology and Soils, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to exposing people or structures to the risk of loss, injury, or death involving seismic induced ground shaking, expansive soils, and ground water. The Modified Project and the No Automated Steel Parking Structure Alternative would implement Certified EIR Mitigation Measure MM IV.C-2.1, which ensures the Modified Project and the No Automated Steel Parking Structure Alternative would be designed and constructed in accordance with the recommendations provided in the CRA Approved Project's Geotechnical Report, the Modified Project's Geotechnical Report, and the Modified Project's Structural Narrative, or as they may be amended by request of the City. The Modified Project and the No Automated Steel Parking Structure Alternative would also implement Certified EIR Mitigation Measure MM IV.C-2.2, which requires the Applicant to ensure geotechnical testing and observation be conducted onsite by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the CRA Approved Project's Geotechnical Report and the Modified Project's Geotechnical Report are implemented where applicable. Therefore, consistent with the Certified EIR's conclusions for the CRA Approved Project, Modified Project and the No Automated Steel Parking Structure Alternative impacts would be less than significant with mitigation.

In addition, similar to the CRA Approved Project, the Modified Project and the No Automated Steel Parking Structure Alternative would implement Certified EIR Mitigation Measure MM IV.C-5, which ensures appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Therefore, consistent with the CRA Approved Project analyzed in the Certified EIR, construction impacts related to soil erosion would be less than significant.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or exacerbate existing environmental conditions that would cause a substantial increase in the severity of previously identified significant effects related to expansive soils.

Reference

For a complete discussion of Geology and Soils see Sections IV.C Geology and Soils and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

B. Noise (Cumulative Construction Noise/Vibration Impacts)

1. Description

a. Cumulative Construction Noise

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to cumulative construction noise.

Noise impacts are localized in nature and decrease substantially with distance. Accordingly, the cumulative construction noise impact analysis focused on the nearest related projects. The Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative construction noise impacts to Emerson College on Sunset Boulevard (Sensitive Receptor No. 13) and 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9), which are one- to two-story multi-family residential buildings.

If construction activities for the Modified Project and Related Project 46 happened concurrently, the outdoor noise levels at Emerson College would not increase ambient exterior noise levels by the 5 dBA or more at Emerson College even if construction of the Modified Project and Related Project 46 occur concurrently. Thus, the cumulative construction noise impact of the Modified Project and Related Project 46 to Emerson College would be less than significant.

Outdoor noise levels at 1527 – 1533 3/4 Bronson Street (Sensitive Receptor No. 9) could reach 89 dBA Leg during the additional construction activities of the Modified Project. 1527 – 1533 3/4 Bronson Street (Sensitive Receptor No. 9) is located adjacent to Related Project 46, approximately 10 feet to the north. At this distance, outdoor noise levels at 1527 - 1533 3/4 Bronson Street (Sensitive Receptor No. 9) could reach 97.3 dBA during construction of Related Project 46. If the additional construction activities for the Modified Project and the construction activities for the Related Project 46 happened concurrently, the outdoor noise levels at 1527 – 1533 \(^3\)/4 Bronson Street could reach 97.9 dBA, which is an increase above ambient exterior noise levels of more than 5 dBA. However, the Modified Project's contribution to that cumulative construction noise level at 1527 – 1533 3/4 Bronson Street would only be 0.6 dBA. Because Related Project 46's construction noise is closer to 1527 – 1533 3/4 Bronson Street than the Modified Project's additional construction noise, Related Project 46's construction noise would be the dominant noise source generating an impact. As a result, the Modified Project's additional 0.6 dBA contribution to cumulative construction noise would not be perceptible to the human ear and therefore would not be cumulatively considerable. Nevertheless, the Modified Project would also implement Mitigation Measure MM F-1.4, which would ensure that if the Modified Project's additional construction activities and Related Project 46's construction activities happen concurrently, then the Modified Project's additional construction activities would not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line. With implementation of MM F-1.4 the Modified Project's additional contribution to noise at 1527 – 1533 3/4 Bronson Street would be reduced to 0.018 dBA. As such, with implementation of Mitigation Measure MM F-1.4, the cumulative construction outdoor noise levels at 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9) could reach 97.3 dBA, which is the same noise level that could be reached with the construction of Related Project 46 alone. Therefore, the Modified Project would not contribute to a cumulative construction noise impact for 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). Thus, with implementation of Mitigation Measure MM F-1.4, the Modified Project's cumulative construction noise impacts would be less than significant.

Additionally, the Modified Project, based on the provisions set forth in LAMC 112.05, would implement Regulatory Compliance Measures CM F-1 and CM F-2, which ensure the Modified Project's compliance with LAMC Section 112.05 to prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible and LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. The Modified Project would also incorporate Mitigation Measures MM F-1.1, MM F-1.2, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which would reduce construction noise to the maximum extent feasible. With the implementation of these measures, the Modified Project's cumulative construction noise contribution at 1527 – 1533 ³/₄ Bronson Street (Sensitive Receptor No. 9) would be less than significant. Furthermore, Related Project 46 as well as other related projects, would be required to comply with the provisions of the LAMC and implement mitigation measures to reduce construction noise to the maximum extent feasible. As such, the Modified Project's cumulative construction noise impacts would be less than significant.

Like the Modified Project, with implementation of the above described measures cumulative construction noise impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant.

b. Cumulative Groundborne Vibration

For cumulative construction-related truck trip groundborne vibration impacts, no sensitive receptors or other structures would be within 24 feet of the haul trucks on the haul truck route for the Modified Project or the related projects that would utilize the same haul route on Sunset Boulevard. Additionally, because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks. Furthermore, Sunset Boulevard, as a commercial corridor, is already utilized by heavy duty trucks and is classified as an Avenue I in the City of Los Angeles Mobility Plan 2035. Based on this information, the Modified Project and the related projects' would not be expected to increase vibration levels associated with construction trucks along Sunset Boulevard.

For cumulative construction-related activity groundborne vibration impacts, the Modified Project and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative groundborne vibration annoyance impacts from construction activities to 1527 – 1533 ¾ Bronson Street (Sensitive Receptor No. 9). The Modified Project's additional construction activities would result in groundborne vibration levels of 0.018 PPV (in./sec.) at Sensitive

Receptor No. 9, which would be well below the distinctly perceptible thresholds for groundborne vibration of 0.25 PPV (in./sec.) for transient sources and 0.04 PPV (in./sec.) threshold for human annoyance from continuous/frequent intermittent sources and therefore would have a less than significant impact on Sensitive Receptor No. 9. The EIR for Related Project 46 concluded that the 5901 Sunset Boulevard Project's construction activities would result in a significant unavoidable impact with respect to groundborne human annoyance on Sensitive Receptor 9. Groundborne vibration decreases substantially as the distance between the receptor and the source increases. Therefore, because Related Project 46's construction activities are closer to Sensitive Receptor No. 9 than the Modified Project's additional construction activities, the Modified Project's construction related vibration would not be the dominant vibration-generating source for impacts to Sensitive Receptor No 9. Nevertheless, to ensure that the Modified Project does not increase cumulative groundborne vibration impacts with respect to frequency or intensity at Sensitive Receptor No. 9, the Modified Project would implement Mitigation Measure MM F-1.5.

Specifically, Mitigation Measure MM F-1.5 would ensure that if the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently, then the Modified Project's additional construction activities would be temporarily halted if the groundborne vibration levels at the Modified Project's property line closest to Sensitive Receptor No. 9 reach 0.035 PPV. Implementation of this measure would ensure that groundborne vibration at the property line would not exceed 0.04 PPV (in./sec.), which is the threshold for groundborne vibration for continuous/frequent intermittent sources. Measurement of groundborne vibration levels at the Modified Project's property line would include the cumulative vibration generated from both the Modified Project's additional construction activities as well as groundborne vibration generated from Related Project 46 if construction of both projects is occurring at the same time. As a result, the measurement of groundborne vibration at the Modified Project's property line is conservative because it will ensure that the 0.04 PPV (in./sec.) threshold is not exceeded at Sensitive Receptor No. 9 since actual groundborne vibration would further attenuate below the threshold with the additional distance between the property line and Sensitive Receptor No. 9. Thus, with implementation of Mitigation Measure MM F-1.5 the Modified Project's additional construction would not contribute to additional groundborne vibration impacts at Sensitive Receptor No. 9. Therefore, with implementation of Mitigation Measure MM F-1.5, the Modified Project would not contribute to a cumulative construction-related groundborne vibration impact for Sensitive Receptor No. 9. Accordingly, cumulative groundborne vibration impacts would be less than significant.

Like the Modified Project, with implementation of the above described measures cumulative construction-related groundborne vibration impacts associated with the No Automated Steel Parking Structure Alternative would be less than significant.

2. Project Design Features

No Project Design Features are proposed for Noise/Vibration.

3. Mitigation Measures

MM F-1.4: The Modified Project's contractor shall retain the services of a qualified noise consultant to monitor noise at the Modified Project's property line when the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently. If the measured noise levels during concurrent construction exceed the existing ambient noise levels by 4.9 dBA at the Modified Project's property line, the Modified Project's contractor shall evaluate and employ alternative construction methods to ensure that the Modified Project's additional construction activities shall not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line.

MM F-1.5: The Modified Project's contractor shall retain the services of a qualified vibration consultant to monitor vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) when the Modified Project's additional construction activities and Related Project 46's construction activities occur concurrently. If the measured vibration levels during concurrent construction exceed 0.035 PPV (in./sec.) at the Modified Project's property line closest to Sensitive Receptor No. 9, the Modified Project's contractor shall halt groundborne vibration-generating construction activities and evaluate and employ alternative construction methods to ensure that vibration at the Modified Project's property line closest to Sensitive Receptor No. 9 (i.e., 1527 – 1533 ¾ Bronson Street) does not exceed 0.04 PPV (in./sec.).

See also Mitigation Measures MM F-1.1, MM F-1.2, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F 1.5, discussed further in Section X of these Findings, which would reduce construction noise to the maximum extent feasible.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Cumulative Construction Noise/Vibration Impacts, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

Regarding cumulative construction noise, if the Modified Project's or the No Automated Steel Parking Structure Alternative's additional construction activities and the construction activities for the Related Project 46, located at 5901 Sunset Boulevard, happened concurrently, the outdoor noise levels at 1527 – 1533 ¾ Bronson Street could reach 97.9 dBA, which is an increase above ambient exterior noise levels of more than 5 dBA. The Modified Project's contribution to the cumulative construction noise would be 0.6 dBA and would not be perceptible to the human ear and therefore would not be cumulatively considerable. Nevertheless, the Modified Project and the No Automated Steel Parking Structure Alternative would also implement Mitigation Measure MM F-1.4, which would ensure that if the Modified Project's or the No Automated Steel Parking

Structure Alternative's additional construction activities and Related Project 46's construction activities happen concurrently, then the additional construction activities would not exceed the existing ambient noise levels by 5 dBA at the Modified Project's property line. Thus, with implementation of Mitigation Measure MM F-1.4, the Modified Project's and the No Automated Steel Parking Structure Alternative's cumulative construction noise impacts would be less than significant.

Regarding cumulative construction-related activity groundborne vibration impacts, the Modified Project or the No Automated Steel Parking Structure Alternative and the nearest related project, Related Project 46, located at 5901 Sunset Boulevard, immediately east of the project site, could potentially result in cumulative groundborne vibration annoyance impacts from construction activities to 1527 - 1533 3/4 Bronson Street (Sensitive Receptor No. 9). While the Modified Project's and the No Automated Steel Parking Structure Alternative's construction related vibration would not be the dominant vibrationgenerating source for impacts to Sensitive Receptor No 9, to ensure that the Modified Project and the No Automated Steel Parking Structure Alternative do not increase cumulative groundborne vibration impacts with respect to frequency or intensity at Sensitive Receptor No. 9, the Modified Project and No Automated Steel Parking Structure Alternative would implement Mitigation Measure MM F-1.5. Mitigation Measure MM F-1.5 would ensure that if the Modified Project's or the No Automated Steel Parking Structure Alternative's additional construction activities and Related Project 46's construction activities occur concurrently, then the additional construction activities would be temporarily halted if the groundborne vibration levels at the Modified Project's property line closest to Sensitive Receptor No. 9 reach 0.035 PPV. Implementation of this measure would ensure that groundborne vibration at the property line would not exceed 0.04 PPV (in./sec.), which is the threshold for groundborne vibration for continuous/frequent intermittent sources. Thus, with implementation of Mitigation Measure MM F-1.5 the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction would not contribute to additional groundborne vibration impacts at Sensitive Receptor No. 9. Therefore, with implementation of Mitigation Measure MM F-1.5, the Modified Project and the No Automated Steel Parking Structure Alternative would not contribute to a cumulative construction-related groundborne vibration impact for Sensitive Receptor No. 9. Accordingly, cumulative groundborne vibration impacts would be less than significant.

6. Reference

For a complete discussion of Noise (Cumulative Construction Noise/Vibration) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

C. Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency)

1. Description

The Certified EIR concluded the CRA Approved Project, with approval of the requested discretionary actions and adoption of the required findings, would have less than significant impacts related to consistency with the proposed zoning designations with the incorporation of Certified EIR Mitigation Measure MM IV.H-7, which provides that the CRA Approved Project applicant shall procure all necessary entitlements and land use approvals from the Planning Department, including but not limited to the various discretionary actions identified in the Certified EIR.

Implementation of the Modified Project would result in the modification of the CRA Approved Project. To permit the Modified Project the Applicant is proposing a General Plan Amendment, Vesting Zone Change and Height District Change so that the entire project site is subject to uniform land use designations and zoning requirements and a Vesting Tentative Tract Map to merge all of the lots on the project site into a single lot.

Specifically, the Modified Project is seeking a General Plan Amendment to the Hollywood Community Plan from High Medium Density Residential to Regional Center Commercial such that the land use designation for the entire project site is Regional Center Commercial. In addition the Project is seeking a Vesting Zone Change from the (T)(Q)C2 Zone and the (T)(Q)R4 Zone such that the entire project site would be in the C2 Zone. With the approval of the requested General Plan Amendment and Vesting Zone Change, the Modified Project would conform to the permitted uses of LAMC Section 12.14.

The Modified Project is proposing a Vesting Zone Change and Height District Change for the entire project site to a uniform zoning and height district of C2-2D. The proposed "D" Limitation for the Modified Project would limit the number of residential dwelling units allowed on the project site to 299 units. In addition, the proposed "D" Limitation would provide for the following limitations across the entire project site: a) the total allowable floor area for the entire site not to exceed approximately 324,693 square feet (4.5:1 FAR), in lieu of the 6:1 FAR otherwise permitted in Height District 2; and b) the mixed-use building height to approximately 250 feet, (total of 22 stories).

The proposed Modified Project will contain 299 residential apartment units, of which 5 percent of the total units (15 units) will be reserved for tenants at the "Very Low" income level, and therefore qualifies for a Density Bonus under the Municipal Code (see LAMC Section 12.22 A.25(c)). The proposed Modified Project is not utilizing the Municipal Code's Density Bonus provisions for additional residential units within the Modified Project. However, per LAMC Section 12.22 A.25(d)(1) – Affordable Housing Incentives, because the Modified Project qualifies for a Density Bonus, the Applicant will apply Parking Option 1 to the Modified Project's residential parking requirements. The Modified Project also qualifies for one on-menu incentive pursuant to LAMC Section 12.22 A.25(e)(1) and requests a 20 percent decrease in open space requirements to the Modified Project (see LAMC Section 12.22 A.25.(f)(6)). With the approval of this on-menu

incentive, the LAMC open space requirement would be reduced to 35,060 square feet for the Modified Project, which the Modified Project would exceed as the Modified Project proposes to provide 35,234 square feet of open space.

With the approval of the requested Vesting Zone Change and Height District Change, the Modified Project would comply with the permitted density for the project site, which is consistent with the Certified EIR's conclusion that the CRA Approved Project would comply with the permitted density for the project site with the approval of the requested entitlements. In addition, the Modified Project's yard setbacks would be consistent with the requirements of the proposed Zone Change, which is also consistent with the analysis in the Certified EIR.

The relevant land use changes between the CRA Approved Project and the Modified Project would not substantially increase the less-than-significant impact related to consistency with the LAMC. Therefore, compared to the analysis in the Certified EIR, the Modified Project also would be consistent with the LAMC with incorporation of Certified EIR Mitigation Measure MM IV.H-7, which ensures the Modified Project Applicant shall obtain approval of the Modified Project's requested land use entitlements from the Planning Department, including but not limited to the various discretionary actions as listed in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR. As such, with approval of the requested entitlements, the Modified Project would be in conformance with the LAMC and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the existing density and floor area requirements in the LAMC.

Like the Modified Project, with approval of the requested entitlements, the No Automated Steel Parking Structure Alternative would be in conformance with the LAMC and land use impacts would be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the existing density and floor area requirements in the LAMC.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.H-7: The Applicant shall procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City Planning, including but not limited to the various discretionary actions as listed above in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The relevant land use changes between the CRA Approved Project and the Modified Project or the No Automated Steel Parking Structure Alternative would not substantially increase the less than significant impact related to consistency with the LAMC. Compared to the analysis in the Certified EIR, the Modified Project and the No Automated Steel Parking Structure Alternative also would be consistent with the LAMC with incorporation of Certified EIR Mitigation Measure MM IV.H-7, which ensures the Modified Project Applicant shall obtain approval of the requested land use entitlements from the Planning Department. As such, with approval of the requested entitlements, the Modified Project and the No Automated Steel Parking Structure Alternative would be in conformance with the LAMC and land use impacts would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consistency with the LAMC.

6. Reference

For a complete discussion of Land Use Planning Operational (City of Los Angeles Planning and Zoning Code Consistency) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

D. Public Utilities (Solid Waste)

1. Description

a. Construction

The Certified EIR concluded the CRA Approved Project would result in less-thansignificant impacts related to solid waste disposal resources during construction with mitigation measures incorporated. The CRA Approved Project was estimated to generate approximately 32.3 tons of waste per working day, which would be within the excess permitted daily intake capacity of area landfills and recycling centers. Therefore, the Certified EIR concluded impacts associated with demolition and construction debris would be less than significant.

For purposes of quantifying the estimated construction and demolition debris associated with construction of the Modified Project, the analysis quantifies the estimated construction and demolition debris associated with: 1) the construction activities that

occurred as part of construction of the vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area and closed approximately 18,962 square foot public park, which were completed in 2014; and 2) the additional construction activities necessary for the Modified Project associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. For comparative purposes, the Modified Project would generate an estimated total of 2,453 tons of demolition and construction debris as compared to the CRA Approved Project generating an estimated total of 2,348 tons of demolition and construction debris. The Modified Project's total of 2,453 tons of construction and demolition debris, is not a substantial increase from the CRA Approved Project's projected construction and demolition debris (2,348 tons). Furthermore, the construction waste generated during the Modified Project's additional construction period associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations, which is expected to last approximately four months, is estimated to generate a total of 77 tons of demolition and construction debris. Assuming 22 working days per month, the Modified Project's additional construction period would generate approximately 0.88 tons of waste per working day, which is not a substantial increase from the tons of waste per working day generated by the CRA Approved Project. Therefore, the solid waste impacts as a result of construction of the Modified Project would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project during construction. Consistent with the CRA Approved Project, impacts associated with demolition and construction debris would be less than significant.

Additionally, the Sunshine and Chiquita Canyon Landfills would likely be the primary disposal and recycling sites used for demolition and construction debris and the construction solid waste generated by the Modified Project's additional construction would be well within the daily capacity currently available at the Sunshine Canyon Landfill and the Chiquita Canyon Landfill. Therefore, the Modified Project's solid waste impacts during construction would be less than significant.

Furthermore, similar to the CRA Approved Project, the California Green Building Standards Code prescribes mandatory measures for residential projects to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste. Per the 2010 L.A. Green Code, the Modified Project would also implement a construction waste management plan to achieve the 2010 L.A. Green Code's requirement of 50 percent diversion from landfills. Therefore, the California Green Building Standards Code and the 2010 L.A. Green Code's mandatory measures would further reduce the Modified Project's construction and demolition debris. With compliance with the California Green Building Standards Code and the 2010 L.A. Green Code, the Modified Project's construction would generate less demolition and construction debris than the estimated 2,453 tons of construction and demolition debris. As such, the solid waste impacts as a result of the construction of the Modified Project would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project. Furthermore, implementation of Regulatory Compliance Measure CM I.4-1, would effectively achieve a 50 percent reduction in the Modified Project's solid

waste disposal needs upon area landfills. Additionally, implementation of mitigation measure Certified EIR Mitigation Measure MM IV.H-4-1, which ensures the Applicant develops a construction and debris recycling program, would reduce impacts to solid waste to less than significant levels. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's construction would comply with all applicable regulations related to solid waste and construction related solid waste impact upon regional landfill capacity would therefore be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction would comply with all applicable regulations related to solid waste and construction related solid waste impact upon regional landfill capacity would therefore be less than significant and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during construction.

b. Operation

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to solid waste disposal resources with mitigation measures incorporated. The Certified EIR determined the CRA Approved Project daily contribution to the Sunshine Canyon landfill would represents well under one percent of the current excess remaining capacity. Because this increase is negligible in relation to the region as a whole, and solid waste disposal solutions are continuously being sought after on the regional level, the Certified EIR concluded the CRA Approved Project operational solid waste impacts would be considered less than significant.

Operation of the Modified Project would cause an on-going generation of solid waste throughout the lifespan of the Modified Project. For comparative purposes, the Modified Project's net increase in solid waste generation would be 3,599.3 net pounds (1.8 tons) of solid waste per day, or approximately 657 tons per year as compared to the CRA Approved Project's net increase of 3,891.3 net pounds (1.9 tons), or approximately 693.5 tons per year. The Modified Project's gross increase would be 4,078 gross pounds (2.04 tons) of solid waste per day, or approximately 745 tons per year as compared to the CRA Approved Project's gross increase of 4,370 gross pounds (2.2 tons), or approximately 803 tons per year. The Modified Project would generate less solid waste than the CRA Approved Project during operation.

The Modified Project's solid waste contribution to the Sunshine Canyon Landfill represents well under one percent of the current excess remaining capacity, which is consistent with the analysis in the Certified EIR for the CRA Approved Project and would not substantially increase the solid waste impacts identified in the Certified EIR for the CRA Approved Project. Furthermore, the additional solid waste demands generated by the Modified Project could be readily accommodated by the existing regional landfill

operations without the need to expand operations or divert existing waste streams to alternative locations. Additionally, mitigation measure Certified EIR Mitigation Measure MM IV.H-4-2, which ensures the Applicant develops an operational project recycling plan, would reduce impacts upon solid waste disposal facilities to less than significant levels. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would comply with all applicable regulations related to solid waste and the Modified Project's solid waste impact upon regional landfill capacity would be considered less than significant. Moreover, the solid waste impacts associated with the Modified Project's modifications during operation are less than the CRA Approved Project's solid waste impacts during operation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would comply with all applicable regulations related to solid waste and the No Automated Steel Parking Structure Alternative's solid waste impact upon regional landfill capacity would be considered less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste during operation.

2. Project Design Features

No Project Design Features are proposed for Public Utilities (Solid Waste).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.H-4-1: The Applicant shall develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills.

Certified EIR Mitigation Measure MM IV.H-4-2: The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Utilities (Solid Waste), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The Modified Project and the No Automated Steel Parking Structure Alternative's impacts with respect to solid waste would be less than significant with implementation of the Certified EIR Mitigation Measure MM IV.H-4-1 and Certified EIR Mitigation Measure MM IV.H-4-2, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to solid waste.

6. Reference

For a complete discussion of Public Services (Police Services) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

- **E.** Public Services (Police Services)
 - 1. Description
 - **a.** Police Services (Construction)
 - (1) Theft and Vandalism

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction related to theft and vandalism with incorporation of mitigation measures. The Certified EIR determined under the CRA Approved Project's construction of a mixed-use development, a significant impact to police services could occur. However, the CRA Approved Project would employ Mitigation Measures IV.J.1-1 and IV.J.1-2, which require erecting temporary fencing around the construction site to discourage trespassers and deploying security guards to monitor the construction site and deter any potential criminal activity to reduce the impact to police services. With implementation of these mitigation measures, the Certified EIR concluded that the CRA Approved Project would have a less than significant impact to police services during construction.

To allow for the development of the Modified Project minimal additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may be necessary to comply with the building code requirements. Like the CRA Approved Project, the Modified Project would implement Certified EIR Mitigation Measures MM J.1-1.1 and MM J.1-1.2, which require erecting temporary fencing around the project site to secure the project site and discourage trespassers and employing security guards to secure the project site during the construction process. Implementation of these mitigation measures would ensure that construction of the Modified Project would not result in substantial adverse physical impacts that would impact acceptable service ratios or response times or other performance objectives for police protection services

because the Modified Project's construction would include security and design features during construction that would reduce the Modified Project's demand for police services and therefore impacts related to police services during the construction period are less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction of the Modified Project due to theft and vandalism.

Like the Modified Project, with implementation of the above described mitigation measures, impacts related to police services due to theft and vandalism during construction for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction due to theft and vandalism.

(2) Construction-Related Traffic and Temporary Roadway or Sidewalk Closures

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction due to construction-related traffic and temporary roadway or sidewalk closures with incorporation of mitigation measures. As described in the Certified EIR, construction activities could require temporary lane closures on streets adjacent to the project site, which would have the potential to reduce emergency response times in the surrounding area. While the traffic lane closures were not expected for any extended periods for construction, in order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures, Certified EIR Mitigation Measure IV.J.1-2 required the development of a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the CRA Approved Project.

To allow for the development of the Modified Project minimal additional construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may be necessary to comply with the building code requirements. A traffic evaluation of the potential street traffic created by the Modified Project's additional construction activities was conducted in the Modified Project's Traffic Study, included as Appendix G to the Draft Supplemental EIR, and concluded that the additional construction associated with the Modified Project would not create traffic impacts in the vicinity of the project site.

The additional construction activities for the Modified Project could necessitate temporary lane closures on streets adjacent to the project site on a temporary and intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. Site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid any impacts to the neighborhood and surrounding traffic. All construction equipment would be staged on-site or immediately adjacent to the project site throughout the duration of the Modified

Project's additional construction activities. It is not expected that complete closures of any streets would be required during the additional construction activities. The Modified Project would also implement Mitigation Measure IV.J.1-1.1 and Certified EIR Mitigation Measure MM IV.J.1-2.1, which ensures, prior to construction, the development of a Construction Traffic Control/Management Plan for the Modified Project to be approved by LADOT. With implementation of this mitigation measure, the Modified Project's construction-related traffic and temporary roadway or sidewalk closures would not result in substantial adverse physical impacts that would impact acceptable service ratios or response times or other performance objectives for police protection services because the Modified Project's construction would include design features to reduce the demand for police services and therefore impacts related to police services during the Modified Project's construction period would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during additional construction of the Modified Project due to construction-related traffic.

Like the Modified Project, with implementation of the above described mitigation measures, impacts related to police services due to construction-related traffic during construction for the No Automated Steel Parking Structure Alternative would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction due construction-related traffic.

- **b.** Police Services (Operational Impacts)
 - (1) Increase in Resident Population

The Certified EIR concluded that the CRA Approved Project's operational impacts to police services due to an increase in resident population would be less than significant with incorporation of mitigation measures. The Certified EIR explained that the CRA Approved Project would provide an increased 24-hour community presence, which often has the result of reducing crime rates. Nevertheless, to reduce the potential for increasing the demands upon police services, the CRA Approved Project included Mitigation Measures MM IV.J.1-3.1 and MM IV.J.1-3.2 providing for positioned functional and thematic lighting, nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities, and an on-site security plan to reduce operational impacts to police services to a less-than-significant level.

Like the CRA Approved Project, the Modified Project would provide an increased 24-hour community presence, which often has the result of reducing crime rates. Further, as compared to the CRA Approved Project, the Modified Project would result in a decrease in the on-site residential population (from 722 new residents to 715 new residents), and therefore the Modified Project's increase in land use activity and associated police service needs would be the same or less than the CRA Approved Project. Nevertheless, to reduce the potential for increasing the demands upon police services in the area, the Modified Project, consistent with the CRA Approved Project, would include strategically positioned

functional and thematic lighting to enhance public safety (see Regulatory Compliance Measure CM J.1-1, which includes submitting a diagram showing access routes and information to facilitate police response to the Los Angeles Police Department's Crime Prevention Section). Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The building and layout design would also include crime prevention features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities for the Modified Project. In addition, the continuous visible and non-visible presence of residents and employees at all times of the day would provide a sense of security during evening and early morning hours.

As part of the Modified Project, the Applicant would implement an on-site security plan prepared in consultation with the LAPD Crime Prevention Unit to minimize the potential for on-site crime and reduce demands upon additional LAPD services. With implementation of the security plan (Certified EIR Mitigation Measure MM IV.J.1-3.1 and MM IV.J.1-3.2), the Modified Project's impacts upon police services would be less than significant, consistent with the Certified EIR's analysis of the CRA Approved Project. Additionally, implementation of Regulatory Compliance Measure CM J.1-1, which requires the Applicant to submit a diagram of each portion of the property to the Los Angeles Police Department's Crime Prevention Section prior to the issuance of any Certificate of Occupancy, would further reduce the Modified Project's impacts upon police services. Moreover, because of the decrease in the on-site residential population the Modified Project's impacts upon police services are the same or less than the CRA Approved Project's impacts upon police services. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation of the Modified Project due to the resident population.

Like the Modified Project, with implementation of the above described mitigation measures the No Automated Steel Parking Structure Alternative's impacts upon police services would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation due to the resident population.

(2) Increase Demands Upon Police Services

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to increase demands upon police services with implementation of mitigation measures. As described in the Certified EIR for the CRA Approved Project, the public park could attract additional persons to the project area. The Certified EIR stated the CRA Approved Project's Applicant would be required to manage and maintain the park in accordance with all public health and safety regulations and that implementation of the CRA Approved Project's security plan will provide a continuous security presence to deter criminal activity, which would reduce impacts related to increase demands upon police services to a less than significant level.

Compared to the CRA Approved Project, the Modified Project would slightly decrease the size of the public park (from 21,177 square feet to 18,962 square feet). Despite the small difference in square footage, consistent with the CRA Approved Project, the Modified Project's public park could attract additional persons to the project area. As with any public park or open space area, if not properly maintained and secured, such public places have the potential to attract criminal elements and blight. To reduce any such potential effects of the proposed park, the Applicant or Los Angeles Department of Recreation and Parks (RAP) (pending acquisition of a perpetual easement) will be required to manage and maintain the park in accordance with all public health and safety regulations. Furthermore. the Modified Project's security plan will provide a continuous security presence to deter criminal activity within and around the park (see Certified EIR Mitigation Measure MM IV.J.1-3.1 and MM IV.J.1-3.2). Therefore, through the implementation of regulatory compliance and mitigation measures, impacts on the demand for police services associated with the public park would be mitigated to a less than significant level, consistent with the Certified EIR's analysis of the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation of the Modified Project due to the public park.

Like the Modified Project, through the implementation of the above described mitigation measures, impacts on the demand for police services associated with the public park for the No Automated Steel Parking Structure Alternative would be mitigated to a less than significant level and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during operation due to the public park.

2. Project Design Features

No Project Design Features are proposed for Public Services (Police Services).

3. Mitigation Measures

MM IV.J.1-1.1: During construction, the Modified Project shall include the following measures:

- 1. A Construction Traffic Control/Management Plan shall be submitted to LADOT for review and approval.
- 2. The bulk of the work shall be conducted on site. If temporary lane closures are necessary, Street Services approval shall be obtained and closures shall be limited to non-peak commute hours from 9:00 AM to 3:00 PM.
- 3. Existing access for the site shall be maintained for construction access.
- 4. Deliveries of construction material shall be coordinated to non-peak travel periods, to the extent possible.

5. Construction workers shall be prohibited from parking on adjacent streets and construction workers shall be directed to park on-site.

Certified EIR Mitigation Measure MM IV.J.1-1.1: The Applicant shall erect temporary fencing suitable to prevent trespassers from entering the project site during construction activities to secure the project site and discourage trespassers.

Certified EIR Mitigation Measure MM IV.J.1-1.2: The Applicant shall employ security guards to monitor and secure the project site after hours during the construction process to secure the site and deter any potential criminal activity.

Certified EIR Mitigation Measure MM IV.J.1-2.1: In order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan should include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project if necessary.

Certified EIR Mitigation Measure MM IV.J.1-3.1: The proposed security plan shall incorporate low-level and directional security lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

Certified EIR Mitigation Measure MM IV.J.1-3.2: The Applicant shall develop and implement a Security Plan in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Modified Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD West Bureau Commanding Officer. Said security plan may include some or all of the following components:

- i. Provisions for on-site private security personnel for the commercial and residential areas. Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be provided. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells. All security officers shall patrol the grounds primarily by foot; however, bike patrol may be implemented in the parking garages and on the surrounding roadways.
- ii. The parking garages shall be designed to cordon off residential and commercial serving parking areas to provide increased security for

residents of the Modified Project. Both residential and commercial parking areas shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that will provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Services (Police Services), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts to police services during construction and operations with incorporation of mitigation measures. For the Modified Project and the No Automated Steel Parking Structure Alternative with implementation of MM IV.J.1-1.1, Certified EIR Mitigation Measure MM IV.J.1-1.1, Certified EIR Mitigation Measure MM IV.J.1-1.2, Certified EIR Mitigation Measure MM IV.J.1-2.1, Certified EIR Mitigation Measure MM IV.J.1-3.1, and Certified EIR Mitigation Measure MM IV.J.1-3.2 impacts to police services during construction and operations would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to police services during construction or operation.

6. Reference

For a complete discussion of Public Services (Police Services) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

F. Public Services (Schools, Construction)

1. Description

The Certified EIR concluded the CRA Approved Project's construction impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement precautionary mitigation measures during construction that were recommended by the LAUSD, specifically Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2, which provide measures to ensure school bus access and school pedestrian/traffic safety access. The Modified Project would result in minimal additional on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately

four months, which is not a substantial increase from the CRA Approved Project's construction timeline. As such, like the CRA Approved Project, the Modified Project would also implement Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2 to ensure school bus access and school pedestrian/traffic safety access during construction. Thus, the potential for the Modified Project to impact school facilities and services during construction will be similar under the Modified Project as compared to the impact conclusion in the Certified EIR, and would remain less than significant with the implementation of mitigation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impact to school facilities and services during construction will be less than significant with the implementation of mitigation and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to school facilities and services during construction.

2. Project Design Features

No Project Design Features are proposed for Public Services (Schools, Construction).

3. Mitigation Measures

Certified EIR Mitigation Measure MM IV.J.3-1.1: School Bus Access

- Prior to construction, contact the LAUSD Transportation Branch at (323) 342-1400 regarding potential impact to school bus routes.
- Maintain unrestricted access for school buses during construction.
- Comply with Provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

Certified EIR Mitigation Measure MM IV.J-3.1.2: School Pedestrian/Traffic Safety Access

- Not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (LAUSD will provide School Pedestrian Route Maps upon your request).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.

- Not haul past affected school sites, except when school is **not** in session. If that is infeasible, not haul during school arrival and dismissal times.
- Not staging or parking of construction-related vehicles, including worker-transport vehicles, adjacent to school sites.
- Provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.
- Provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project and the No Automated Steel Parking Structure Alternative which avoid or substantially lessen the potentially significant impacts associated with Public Services (Schools, Construction), as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

The Certified EIR concluded the CRA Approved Project's construction impacts to school services would be less than significant with mitigation. The CRA Approved Project proposed to implement precautionary mitigation measures during construction that were recommended by the LAUSD, specifically Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2. Like the CRA Approved Project, the Modified Project would also implement Certified EIR Mitigation Measures MM IV.J.3-1.1 and MM IV.J-3.1.2 to ensure school bus access and school pedestrian/traffic safety access during construction. Thus, the potential for the Modified Project and the No Automated Steel Parking Structure Alternative to impact school facilities and services during construction will be similar under the Modified Project and the No Automated Steel Parking Structure Alternative as compared to the impact conclusion in the Certified EIR, and would remain less than significant with the implementation of mitigation. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to schools during construction.

6. Reference

For a complete discussion of Public Services (Schools, Construction) see Sections IV.J Public Services and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

G. Traffic/Transportation

1. Description

(1) Construction

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation related to temporary traffic and circulation patterns in the project vicinity during construction. The Certified EIR stated, to address traffic congestion on local roadways during peak traffic periods, the Planning Department has started implementing mitigation measures to restrict haul route trips to off peak hours. Such measures are automatically imposed as project conditions when applicants obtain haul route permits. Thus, the Certified EIR determined such measures would further reduce the CRA Approved Project's potential impact upon traffic conditions during the construction process to less than significant levels. The Certified EIR also stated, in order to further mitigate potentially significant construction related impacts, the CRA Approved Project would be required to develop a Construction Traffic Control/Management Plan to be approved by LADOT. Thus, the Certified EIR concluded traffic impacts during construction of the CRA Approved Project would be mitigated to less than significant levels.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction activities would not overlap with the construction activities described for the CRA Approved Project and would only require minimal on-site construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Construction of the new automated steel parking structure and interior building renovations would take approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. It was estimated for the CRA Approved Project that an average of 200 construction workers would access the project site throughout the duration of the construction process, with a peak activity level of 250 workers. During the Modified Project's additional construction, off-site activity would typically involve construction workers arriving and departing the site, and the arrival and departure of construction haul trucks and trucks delivering construction materials to the site. Compared to the CRA Approved Project, it is estimated that approximately 83 construction worker and construction related vendor trips would access the project site on a daily basis throughout the Modified Project's additional construction process, which is not a substantial increase from the CRA Approved Project's number of construction workers.

Unlike the CRA Approved Project's Certified EIR, which did not include a construction activities traffic evaluation, a traffic evaluation of the potential street traffic created by the construction activities was conducted for the Modified Project's additional construction period. As shown in Table 16 in the Modified Project's Traffic Study, contained in Appendix G of the Draft Supplemental EIR, the Modified Project's additional construction would result in less than significant construction traffic impacts at all of the twenty intersections during both the A.M. and P.M. peak hours. Thus, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's impacts to traffic during construction would be less than significant. Additionally, the Modified Project would implement Regulatory Compliance Measure CM K.1-1, which requires adoption of construction measures (a Construction Traffic Control/Management Plan be submitted to LADOT for review and approval; the bulk of the construction work conducted on-site; if temporary lane closures needed. Street Services approval and be limited to non-peak commute hours; maintenance of existing site access for construction access; deliveries coordinated to non-peak travel periods to the extent possible; and construction workers prohibited from parking on adjacent streets and directed to park on-site). Implementation of Regulatory Compliance Measure CM K.1-1, which includes approval of a Construction Traffic Control/Management Plan and the maintenance of existing site access would ensure that emergency access to the site is maintained at all times and further reduce impacts related to traffic during construction.

Additionally, to address traffic congestion on local roadways during peak traffic periods, the Planning Department implements mitigation measures to restrict haul route trips to off peak hours. Therefore, Certified EIR Mitigation Measure MM IV.K.1-2, which would bind the Applicant to specific haul route conditions through a Covenant and Agreement would be automatically imposed if it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities and would further reduce the Modified Project's potential impact upon traffic conditions during the additional construction activities.

The Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations could necessitate temporary lane closures on streets adjacent to the site on a temporary and intermittent basis for utility relocation/hook-ups, delivery of materials and other construction related activities. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid impacts to the neighborhood and surrounding traffic. Because such potential lane closures would be temporary, they would not be expected to cause significant traffic impacts. Thus, the Modified Project's impacts related to traffic during the additional construction period would be less than significant. Furthermore, implementation of Regulatory Compliance Measure CM K.1-1, which requires adoption of construction measures and Certified EIR Mitigation Measure MM IV.K.1-2 would further reduce impacts related to traffic during the additional construction period.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts related to traffic during the additional construction period would be less than significant and implementation of Regulatory Compliance Measure CM K.1-1 and Certified EIR Mitigation Measure MM IV.K.1-2 would further reduce impacts related to traffic during the additional construction period. Accordingly, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during construction.

(2) Operation

(a) Intersections

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts at all the studied intersections during the A.M. and P.M. peak hours for the future with the CRA Approved Project conditions. The Certified EIR concluded the addition of the CRA Approved Project's traffic to the future (2009) traffic volumes would not cause the level of service to change at any of the study intersections during the A.M. and P.M. peak hours. Therefore, the Certified EIR determined the CRA Approved Project's traffic impacts would be less than significant.

As detailed in Section IV.K.1 Traffic/Transportation of the Draft Supplemental EIR as well as Section III.A Topical Responses to Comments of the Final EIR, the Modified Project's impacts related to intersections during both the A.M. and P.M. peak hours to the 2015 or 2016 traffic conditions would be less than significant.

Regarding future conditions, since cumulative conditions have changed since the time of the Certified EIR, the Modified Project's traffic impacts were assessed under future (2017) and (2018) conditions. Specifically, in the Draft Supplemental EIR traffic generated by the Modified Project was added to the Future Without Modified Project traffic volumes in 2017 (ambient plus related project growth), to determine the Future With Modified Project traffic volumes at the study intersections. In the Final Supplemental EIR traffic generated by the Modified Project was added to the Future Without Modified Project traffic volumes in 2018 (ambient plus related project growth), to determine the Future With Modified Project traffic volumes at the study intersections.

The Future Plus Modified Project Traffic Conditions Analysis indicates that for the A.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the A.M. peak hour during the future (2017 or 2018) conditions: Bronson Avenue and Sunset Boulevard. The Future Plus Modified Project Traffic Conditions Analysis indicates that for the P.M. peak hour, the addition of Modified Project traffic could significantly impact one intersection in the P.M. peak hour during the future (2017 or 2018) conditions: Gower Street and Sunset Boulevard. In addition, as part of the Final Supplemental EIR an additional distribution analysis was conducted which determined that the intersection of Vine Street and Sunset Boulevard could be significantly impacted by Modified Project traffic during the P.M. Peak Hour.

Therefore, the Modified Project could significantly impact one of the twenty intersections during the A.M. peak hour and one of the twenty intersections during the P.M. peak hour. In addition, under the Final Supplemental EIR's additional distribution analysis the Modified Project could significantly impact an additional intersection during the P.M. peak hour. However, Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements and Mitigation Measure MM K.1-3, which includes implementation of a Transportation Demand Management Plan, would reduce the Modified Project's impacts to less than significant levels.

Mitigation Measure MM K.1-1 would provide, at the intersection of Gower Street and Sunset Boulevard, an operation northbound right turn lane by improving the northbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and operational right turn lane. Implementation of Mitigation Measure MM K.1-1 requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces. Therefore, as part of Mitigation Measure MM K.1-1, the Modified Project would set aside 3 parking spaces within the Modified Project's parking structure for public parking as well as install additional system detector loops along the west side of Gower Street. Mitigation Measure MM K.1-2 would provide, at the intersection of Bronson Avenue and Sunset Boulevard, an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and an operational right turn lane. Implementation of Mitigation Measure MM K.1-2 requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard. Therefore, as part of Mitigation Measure MM K.1-2, the Modified Project would set aside 4 additional parking spaces within the Modified Project's parking garage for public parking as well as install additional system detector loops along the west side of Bronson Avenue. The Modified Project would provide the additional 7 public parking spaces on-site, which would be provided to the public for one hour free. The Applicant proposes to provide a sign outside of the Modified Project's parking structure on Gordon Street, as permitted by the LAMC, indicating the availability of these public parking spaces on-site. The public parking spaces in the Modified Project's parking structure would not create new vehicle trips as these parking spaces are being provided to replace existing parking spaces in the immediate vicinity of the project site.

Mitigation Measure MM K.1-3 would provide a Transportation Demand Management (TDM) Plan at the Modified Project that incorporates enhanced measures to achieve a reduction in the Modified Project's vehicle trips by 10 percent during the P.M. Peak Hour, which would be more than sufficient to ensure that the Vine Street and Sunset Boulevard intersection would be mitigated to a level such that the intersection would not be significantly impacted by Modified Project traffic.

Therefore, implementation of these mitigation measures would reduce the Modified Project's impacts during the A.M. and P.M. peak hour to a less than significant level. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would result in less than significant impacts after mitigation related to analyzed intersections during both the A.M. and P.M. peak hours. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve

new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the intersections during both the A.M. and P.M. peak hours.

In addition, as an alternative related to parking, the Applicant may seek approval of an ordinance to reduce the clear space required at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the Modified Project's parking stalls to be compact parking stalls to increase the available on-site parking supply to benefit the surrounding community in this area of Hollywood. Under this alternative, the Modified Project would provide approximately 508 parking spaces. This alternative would not encourage additional vehicle trips to the project site because trip generation for the Modified Project is based on the proposed mix of uses (residential, office, restaurant, retail, and coffee shop), and providing additional parking spaces for those uses would not modify the proposed mix of uses or demand for those uses. Therefore, the additional parking spaces would not modify the vehicle trip assumptions for the Modified Project. Further, of the 80 additional parking spaces, approximately 63 of them would be tandem parking spaces within the residential portion of the parking garage. These additional tandem parking spaces would provide additional on-site parking for certain residential units but would not encourage additional vehicle trips to the project site because, as explained above, trip generation assumptions are based on the number of residential units, which would remain the same. Further, these additional parking spaces would only be replacing parking reductions that are permitted for the Modified Project by providing affordable housing and bicycle parking as discussed in Section IV.H Land Use Planning and Section IV.K.2 Parking of the Draft Supplemental EIR. Therefore, the proposed alternative to provide additional parking spaces does not modify any of the analysis.

Like the Modified Project, implementation of the above described mitigation measures would reduce the No Automated Steel Parking Structure Alternative's impacts during the A.M. and P.M. peak hour to a less than significant level and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the intersections during both the A.M. and P.M. peak hours.

In addition, the No Automated Steel Parking Structure Alternative would provide approximately 508 parking spaces, which as discussed above would not encourage additional vehicle trips to the project site and would not modify any of the Supplemental EIR analysis regarding impacts to intersections during both the A.M. and P.M. peak hours.

(b) Roadway Segment

The CRA Approved Project's Neighborhood Traffic Analysis stated the CRA Approved Project's impacts related to roadway segment traffic volumes would be less than significant. The Modified Project's commercial component would increase the average daily traffic by less than 12 percent on Gordon Avenue south of Carlton Way, Carlton Way east of Gower Street, and Carlton Way west of Bronson Avenue segment. Therefore, the traffic impact of the Modified Project to these street segments would be below the 12 percent or more increase in average daily traffic thresholds. Therefore, the Modified

Project's impacts related to roadway segment traffic volumes would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during operation.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's impacts related to roadway segment traffic volumes would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic during operation.

(3) Congestion Management Program

The Certified EIR concluded the CRA Approved Project would have a less than significant impact upon the CMP network. As with the CRA Approved Project, for the Modified Project the nearest CMP intersection is Santa Monica Boulevard & Western Avenue. approximately one mile from the project site. It is anticipated that a conservative maximum of 10 percent of the Modified Project trips will go through the intersection during the peak periods which would equate to 26 trips during the Peak Hours (without taking credit for the prior uses that existed on the project site). This is below the CMP significance threshold of 50 vehicles or more added during the peak hours. The nearest CMP freeway monitoring segment is the Hollywood Freeway. The Modified Project's trip volumes are anticipated to be dispersed throughout the freeway system in the area. It is anticipated that, conservatively, approximately 10 to 15 percent of the Modified Project volumes will be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be 37 vehicles during the peak hours (without taking credit for the prior uses that existed on the project site). Based on this information, no additional CMP intersection or freeway analysis is necessary. Nevertheless, an area freeway analysis was conducted and the Modified Project's addition to these volumes creates a minimal impact with up to a 0.2 percent increase during the 2015 peak periods and 0.3 percent increase during the future peak periods. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project would have a less than significant impact upon the CMP network. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the CMP network.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would have a less than significant impact upon the CMP network and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to the CMP network.

(4) Alternative Transportation

The Certified EIR concluded the CRA Approved Project would result in less than significant impacts related to alternative transportation facilities.

The project site is located in a Transit Priority Area with high levels of public transportation service. For the Modified Project transit ridership would utilize approximately 0.4 percent of available transit capacity during the peak hours. Therefore, there is sufficient transit capacity for the Modified Project and the Modified Project's impacts to the transit system would be less than significant. In addition, while the Modified Project and other related projects will cumulatively add new ridership to the transit system, the project site and the greater Hollywood area in general are served by a considerable amount of transit service, including the Metro Red Line, several rapid and local bus routes and LADOT service. The related projects that are anticipated to be completed at or before the Modified Project and the Modified Project are conservatively estimated to generate transit trips that represent approximately 3.5 percent of the available transit capacity during the peak hours. Therefore, there is sufficient transit capacity for the related projects and the Modified Project and the cumulative transit impacts would be less than significant. In addition, neither the construction nor operation of the Modified Project would involve the relocation, replacement, or hinder the function of any of these public transportation facilities. Prior to the Modified Project's additional construction activities, the Modified Project would implement PDF IV.K.1-3, which ensures the Applicant contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. Operation of the Modified Project would establish a commercial and residential culture that affirms employees and residents decisions to use a commuting alternative. Further, the Modified Project would implement Mitigation Measure MM K.1-3, which ensures implementation of an employer and site based Transportation Demand Management (TDM) program that would encourage transit usage and other multi-modal commuter options. To this end, the Modified Project will provide several incentives for residents and employees to use alternate means of transportation.

In addition, the Modified Project would provide 401 bicycle parking spaces to accommodate the future residents and employees of the Modified Project, which would be in compliance with the LAMC. To incentivize carpooling, the Modified Project would include 3 designated spaces for rideshare vehicles. These components will further promote the use of alternative transportation. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the Modified Project's impacts on alternative transportation facilities would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to alternative transportation facilities.

Like the Modified Project, the No Automated Steel Parking Structure's impacts on alternative transportation facilities would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to alternative transportation facilities.

(5) Bicycle, Pedestrian and Vehicle Safety

The Certified EIR did not discuss the CRA Approved Project's impacts with respect to bicycle safety. The Certified EIR did discuss pedestrian safety and circulation patterns and concluded the CRA Approved Project would result in less than significant impacts related to pedestrian safety and circulation patterns.

Vehicular access for the Modified Project would be from a single driveway off of Gordon Street north of Sunset Boulevard. The driveway will be located at the north end of the building site, south of the park site. The driveway would be designed with appropriate signage and warning lights/sounds to warn drivers to slow on approach and to warn pedestrians and bicyclists of approaching vehicles. In addition, the Modified Project provides for ground floor retail uses and entry plazas along Sunset Boulevard to provide an attractive, lively and safe pedestrian environment. Also, compared to the CRA Approved Project, the Modified Project will provide a total of 401 bicycle parking spaces, which will include at least 311 long term bicycle storage facilities that will be located in a safe, convenient, secure and well-maintained bicycle parking area. Short term bicycle parking spaces will be located outside the building on the Sunset Boulevard frontage as well as inside the ground level of the building and parking garage with direct access to the street. Thus, the Modified Project's design would not increase hazards to bicycle, pedestrian and vehicle safety.

Furthermore, the City of Los Angeles has adopted 2015-2035 Vision Zero Los Angeles in order to fulfill the City's commitment to eliminate all traffic deaths by 2025. As a result, LADOT has identified the City's High Injury Network (HIN) of city streets. Sunset Boulevard between Custer Avenue (west of the Harbor Freeway downtown) and Crescent Heights Boulevard is identified as part of the HIN. This stretch includes Sunset Boulevard along the southern boundary of the project site. Two of the signalized intersections along this stretch of roadway have Continental Crosswalks including Sunset Boulevard and Gordon Street (North, South, East, and West Legs) and Sunset Boulevard and Argyle Avenue (North, East, and West Legs), which serve to reduce traffic related injuries and maintain the performance and safety of public transit, bicycle or pedestrian facilities at these two intersections. In addition to the existing Continental Crosswalks, the Modified Project would implement PDF IV.K.1-2, which would improve the signalized intersections with Continental Crosswalks at Sunset Boulevard and Gower Street (North, South, East, and West Legs) and Sunset Boulevard and Bronson Avenue (North, South, East, and West Legs) to increase motorists' visibility of pedestrians to the east and west of the project site. Implementation of PDF IV.K.1-2 would be consistent with the City Vision Zero policies and approach to addressing improvements to the City's HIN. As such, with implementation of PDF IV.K.1-1 and PDF IV.K.1-2, the Modified Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, consistent with the analysis in the Certified EIR for the CRA Approved Project, the potential impacts to bicycle, pedestrian and vehicle safety would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the

severity of previously identified significant effects related to bicycle, pedestrian, and vehicle safety.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative potential impacts to bicycle, pedestrian and vehicle safety would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to bicycle, pedestrian, and vehicle safety.

(6) Project Access

The Certified EIR did not analyze project access impacts in Section IV.K.1 Traffic/Transportation of the Certified EIR. However, the Certified EIR concluded in Section IV.J Public Services that the CRA Approved Project would not inhibit emergency vehicle access and impacts related to emergency access would be less than significant.

The Modified Project's additional construction activities associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations could necessitate temporary lane closures on streets adjacent to the site on a temporary and intermittent basis for utility relocation/hook-ups, delivery of materials and other construction related activities. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on-site to avoid impacts to emergency access. Additionally, as discussed above, a traffic evaluation of the potential street traffic created by the Modified Project's construction activities was conducted. Intersections nearest the primary project site access with an LOS of E or F are considered to inhibit project access. The primary project site access during the Modified Project's additional construction activities would be the single driveway off of Gordon Street north of Sunset Boulevard currently on the project site. When added to future traffic volumes, the Modified Project's additional construction activities would not cause the nearest intersection, Intersection #13 (A and B), Gordon Street and Sunset Boulevard, to operate at LOS E or LOS F during the A.M. or P.M. peak hours. As such, impacts related to project access during construction of the Modified Project's additional construction activities would be less than significant. Furthermore, the Modified Project would implement Regulatory Compliance Measure CM K.1-1, which includes approval of a Construction Traffic Control/Management Plan and the maintenance of existing site access. As such, implementation of this regulatory compliance measure would ensure that project access to the site is maintained at all times and further reduce impacts related to project access during construction.

During operation, primary project access for the Modified Project would be from a single driveway off of Gordon Street north of Sunset Boulevard. As provided in Appendix C Supplemental Traffic Analysis, to the Final Supplemental EIR the Modified Project's parking garage has ample capacity for vehicles that would queue as part of the Modified Project. Based on that analysis, no queues would extend beyond the Modified Project's parking structure to affect traffic on Gordon Street and therefore no queuing impacts would occur.

Additionally, the Modified Project's operation would not cause the nearest intersections to operate at LOS E or LOS F during the A.M. or P.M. peak hours. Furthermore, the Modified Project would implement Regulatory Compliance Measures CM J.2-1 through CM J.2-3, which would require the Modified Project Applicant to ensure firefighting personnel and apparatus access, establish conditions the Modified Project must meet to the satisfaction of the City Fire Department, and submit a Fire Life Safety Resources Management plan to the City Fire Department. Implementation of Regulatory Compliance Measures CM J.2-1 through CM J.2-3 would ensure adequate emergency service access during operation and further reduce impacts related to project access. Therefore, Modified Project impacts related to project access would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to project access.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative impacts related to project access would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to project access.

2. Project Design Features

PDF K.1-2: The Modified Project shall improve the intersections of Gower Street and Sunset Boulevard (North, South, East and West Legs) and Bronson Street and Sunset Boulevard (North, South, East and West Legs) with Continental Crosswalks.

PDF K.1-3: The Applicant shall contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating the Modified Project's additional construction activities. For closures that last more than six months, LACMTA's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating the Modified Project's additional construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

3. Mitigation Measures

MM K.1-1: Gower Street & Sunset Boulevard. The Modified Project shall improve the Gower Street & Sunset Boulevard intersection to provide an operational northbound right turn lane by improving the northbound approach from a left turn lane and shared through/right turn lane to a left turn lane, through lane and operational right turn lane. Because this improvement requires the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard and removal of two to three metered parking spaces, the Modified Project shall set aside up to 3 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Gower Street.

MM K.1-2: Bronson Avenue & Sunset Boulevard. The Modified Project shall improve the Bronson Avenue and Sunset Boulevard intersection to provide an operational southbound right turn lane by improving the southbound approach from a left turn lane and shared through/ right turn lane to a left turn lane, through lane and an operational right turn lane. Because this improvement requires the removal of up to 4 parking spaces on the west side of Bronson Avenue north of Sunset Boulevard, the Modified Project shall set aside 4 spaces for public parking to replace these parking spaces on-site. Additionally, the Modified Project shall install additional system detector loops along the west side of Bronson Avenue.

MM K.1-3: The Modified Project shall implement a Transportation Demand Management (TDM) Plan, consistent with the recommendations of LADOT, that would achieve a least a 10 percent reduction in the Modified Project's P.M. Peak Hour trips. While multiple methods of compliance may be available for certain measures, the final TDM Plan shall be reviewed and approved by LADOT prior to the certificate of occupancy for the Modified Project to ensure that the TDM Plan will provide at minimum a 10 percent reduction in the Modified Project's P.M. Peak Hour trips. Potential measures that could achieve a 10 percent reduction in the Modified Project's P.M. Peak Hour trips include the following elements:

- 1. Establish an on-site Transportation Management Office (TMO) as part of the management office to assist residents and employees in finding alternate travel modes and strategies.
- 2. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;
- 3. Provide car sharing service for residents and employees;
- 4. Encourage alternative work arrangements for residents and employees;
- 5. Improve the existing bus stop on the north side of Sunset Boulevard, east of Gordon Street;
- 6. Provide transit pass reductions of at least 25 percent for residents and employees
- 7. Provide carpool and vanpool matching and preferential parking for carpools/vanpools that register with the TMO;
- 8. Provide secure bicycle facilities and bicycle sharing service for residents and employees;
- 9. Provide transit and ridesharing incentives such as points or coupons for merchandise

- 10. Provide guaranteed rides home for employees that use alternative modes of transportation or rideshare in the event of an emergency;
- 11. Provide unbundled parking for residents; and
- 12. Encourage office tenants to establish workplace parking for employees (i.e. charging employees of office tenants for some or all of their parking costs) or to establish an employee parking cash-out program.

Certified EIR Mitigation Measure MM IV.K.1-2: If it is necessary for the Applicant to obtain a haul route permit for the Modified Project's additional construction activities, prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

- i. All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible.
- ii. Hours of operation shall be from 9:00 A.M. to 4:00 P.M.
- iii. Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
- iv. Trucks shall be restricted to 18-wheel trucks or smaller.
- v. The Traffic Bureau of the Los Angeles Police Department shall be notified prior to the start of hauling (213.485.3106).
- vi. Streets shall be cleaned of spilled materials at the termination of each work day.
- vii. The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
- viii. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- ix. Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
- x. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- xi. All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.
- xii. All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
- xiii. The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
- xiv. All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
- xv. "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
- xvi. One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
- xvii. The City of Los Angeles, Department of Transportation, telephone 213.485.2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.
- xviii. Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Street Use Inspection Division at (213) 485-3711 before the change takes place.
- xix. The permittee shall notify the Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.
- xx. A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond will be issued by the Valley District Engineering Office, 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401. Further information regarding the bond may be obtained by calling 818.374.5090; or the West Los Angeles District Engineering Office, 1828 Sawtelle Boulevard, 3rd Floor, Los Angeles, CA 90025. Further information regarding the bond may be obtained by calling 310.575.8388; or by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained

by calling 213.977.6039; or by the Harbor District Engineering Office, 638 S. Beacon Street, 4th Floor, San Pedro, CA 90731. Further information regarding the bond may be obtained by calling 310.732.4677.

4. Finding

Changes or alternations and mitigation measures have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the potentially significant impacts associated with Traffic/Transportation, as identified in the Supplemental EIR, to less than significant levels.

5. Rationale for Finding

As discussed above, regarding construction, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts with mitigation. Consistent with the analysis in the Certified EIR, the Modified Project's and the No Automated Steel Parking Structure Alternative's impacts to traffic during construction would be less than significant. Further, implementation of Certified EIR Mitigation Measure MM IV.K.1-2, which would bind the Applicant to specific haul route conditions, would be automatically imposed if it is necessary for the Applicant to obtain a haul route permit for the additional construction activities and would further reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's potential impact upon traffic conditions during the additional construction activities.

Regarding operations, the Certified EIR concluded the CRA Approved Project would result in less than significant impacts at all the studied intersections during the A.M. and P.M. peak hours for the future with the CRA Approved Project conditions. Prior to mitigation, the Modified Project and the No Automated Steel Parking Structure Alternative could significantly impact one of the twenty intersections during the A.M. peak hour and one of the twenty intersections during the P.M. peak hour. In addition, under the Final Supplemental EIR's additional distribution analysis the Modified Project and the No Automated Steel Parking Structure Alternative could significantly impact an additional intersection during the P.M. peak hour. However, Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements and Mitigation Measure MM K.1-3, which includes implementation of a Transportation Demand Management Plan would reduce the Modified Project's and the No Automated Steel Parking Structure Alternative's impact to less than significant.

Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to traffic.

6. Reference

For a complete discussion of Traffic/Transportation see Sections IV.K.1 Traffic/Transportation and VI. Alternatives to the Modified Project of the Draft Supplemental EIR and Section III.A Topical Responses to Comments of the Final Supplemental EIR.

X. Environmental Impacts analyzed in the Supplemental EIR and determined to be significant and UNAVOIDABLE

The following impact areas were concluded by the Draft Supplemental EIR to be significant and unavoidable with the implementation of the mitigation measures described in the Final Supplemental EIR. CEQA Section 21081 and Section 15093(b) of the CEQA Guidelines provide that when the decision of a public agency allows the occurrence of unavoidable significant impacts, the agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. Specifically, pursuant to CEQA Guidelines Section 15093(b), the decision maker must adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant unavoidable adverse environmental effects will occur. As the proposed project will result in significant unavoidable impacts, a Statement of Overriding Considerations that addresses these impacts is presented in Section XIV, Statement of Overriding Considerations, of these Findings.

A. Noise and Vibration (Construction)

1. Description

a. Construction Truck Trip Noise

While the Certified EIR for the CRA Approved Project did not discuss noise levels associated with construction-related truck trips, the Draft Supplemental EIR provides an analysis of the noise levels associated with the CRA Approved Project's construction-related truck trips to provide a comparison to the noise levels associated with the additional construction-related truck trips for the Modified Project. Based on the traffic volumes in the CRA Approved Project's Traffic Study in Appendix F of the Certified EIR, the construction-related truck trips for the CRA Approved Project would not double the volume of traffic on Sunset Boulevard and, therefore, would not have the potential to increase noise along Sunset Boulevard above 3 dBA (CNEL). Therefore, the impacts related to noise generated by the construction-related truck trips from the CRA Approved Project would be less than significant.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction would utilize the same haul route identified in the Certified EIR along Sunset Boulevard. The addition of the construction-related truck trips for the Modified Project's additional construction would not

substantially increase the existing volume of traffic along Sunset Boulevard. The Modified Project's construction worker and construction-related truck trips would not double the existing volume of traffic on Sunset Boulevard and, therefore, would not have the potential to generate a 3 dBA or higher increase in noise levels along Sunset Boulevard. Therefore, it is anticipated the noise generated by the Modified Project's additional construction-related truck trips would not substantially increase noise levels in the Project area and construction-related truck noise impacts from the Modified Project's additional construction-related truck trips would be less than significant.

Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project's additional construction activities, and the fact that the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction-related truck trips on a given day, the Modified Project's additional construction would not substantially increase the noise generated by the construction-related truck trips of the CRA Approved Project. Therefore, the Modified Project's construction-related truck trips would not expose persons to or generation of noise levels in excess of established standards or result in a substantial temporary increase in ambient noise levels in the project vicinity and noise impacts generated by construction-related truck trips would be less than significant. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise generated during construction.

Like the Modified Project, for the No Automated Steel Parking Structure Alternative noise impacts generated by construction-related truck trips would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise generated during construction

b. Construction Activity Noise

The Certified EIR stated construction activities would primarily affect the existing adjacent residences located to the north, west and east of the project site. When compared with the average ambient noise levels recorded in the Certified EIR at the sensitive receptors along Gordon Street, construction activities associated with the CRA Approved Project would exceed ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. While mufflers on the construction equipment would reduce noise levels by an average of 3 dBA, the Certified EIR determined the resulting noise levels from construction of the CRA Approved Project would still exceed thresholds of significance for construction noise.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Specifically, the ground clearing, excavation, grading, foundations, structural and finishing phases of the CRA Approved Project have already occurred as

analyzed in the CRA Approved Project's Certified EIR. The Modified Project's additional construction will require the use of heavy equipment for the retrofitting of existing foundations and construction of the new automated steel parking structure.

During construction of the automated steel parking structure, there would be a mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. Such activities would be similar to but less intensive than the activities involved with the structural and finishing phases of the CRA Approved Project. In addition, construction activities associated with the Modified Project's additional construction activities associated with foundation upgrades and interior building renovations would occur interior to the parking structure and building and would be attenuated by the walls of the existing structure. Noise from interior activities would be attenuated by a factor of 20-40 dBA and thus would generate lower noise levels than construction associated with the CRA Approved Project. The construction of the Modified Project's automated steel parking structure would occur on the exterior of the third level of the parking podium on the north side of the existing structure and would generate similar exterior noise levels as predicted for the CRA Approved Project.

The Modified Project's construction noise associated with the additional construction activities would exceed 5 dBA Leq at all but two of the 13 sensitive receptors. However, the exterior noise levels for construction activities would be the same as identified in the Certified EIR for the CRA Approved Project (i.e., up to 84 dBA CNEL or 89 dBA Leq) for sensitive land uses within 50 feet of the construction site. Therefore, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

Based on criteria set forth in the L.A. CEQA Thresholds Guide, construction activities lasting more than one day that would increase ambient exterior noise levels by 10 dBA or more at a noise sensitive use would result in a significant impact. In addition, the L.A. CEQA Thresholds Guide states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would result in a significant impact. Therefore, construction activities could impact nearby sensitive receptors as construction noise could exceed existing ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. Due to distance, the resulting noise levels would at the residential structures exceed the thresholds of significance for construction noise.

LAMC Section 41.40 regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are limited to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Modified Project would comply with these LAMC requirements. Pursuant to the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. Although the estimated

construction-related noise levels associated with the Modified Project could exceed the numerical noise thresholds, implementation of the mitigation measures would reduce the noise levels associated with construction of the Modified Project to the maximum extent that is technically feasible. The Modified Project would implement Regulatory Compliance Measures CM F-1 and CM F-2, which ensure the Modified Project's compliance with LAMC Section 112.05 to prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible and LAMC Section 41.40, which limits the hours of allowable construction activities. Additionally, the Modified Project would incorporate Mitigation Measures MM F-1.1, MM F-1.2, MM F-1.6, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which would reduce construction noise to the maximum extent feasible. The Modified Project's additional construction activities would also incorporate Mitigation Measure MM F-1.3, which requires the Modified Project's additional construction activities to utilize on-site electrical sources or solar generators in lieu of diesel or gasoline generators where feasible.

Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction noise to the maximum extent feasible, temporary construction-related noise impacts from the Modified Project would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. The Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction noise on a given day. The construction noise levels associated with the Modified Project's additional construction activities would be within the CRA Approved Project's construction noise levels and, therefore, would not substantially increase the CRA Approved Project's construction noise levels.

Additionally, the Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Based on the temporary nature and relatively short duration of the additional construction work involved in the Modified Project, and the fact that the Modified Project's construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction noise on a given day, the noise impacts as a result of construction of the Modified Project would not substantially increase the noise impacts for construction of the CRA Approved Project. Therefore, while the Modified Project's construction-related noise would generate noise levels in excess of established standards and therefore would result in a significant and unavoidable impact, the Modified Project's construction-related noise would be within the impacts of the CRA Approved Project analyzed and disclosed in the Certified EIR and would not substantially increase the CRA Approved Project's impacts related to construction noise. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial

increase in the severity of previously identified significant effects related to construction noise.

For the No Automated Steel Parking Structure Alternative, additional on-site construction would be necessary associated with interior building renovations and may also be necessary to comply with building code requirements. The additional construction is anticipated to be generally limited to interior building locations. While some construction activities may occur on the exterior of the building in connection with interior building renovations, the exterior construction activities would be reduced as no substantial changes to the above-ground parking podium are proposed. While noise from the limited exterior construction activities are conservatively concluded to have a significant and unavoidable impact on a temporary and intermittent basis consistent with the analysis of construction activities for the CRA Approved and Modified Project due to the proximity of nearby sensitive receptors, as compared to the Modified Project's additional construction activities, the No Automated Steel Parking Structure Alternative's additional construction activities would slightly reduce the intensity of the significant noise impact. Nevertheless, construction related noise would continue to result in a significant and unavoidable impact. As compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

c. Construction Truck Trip Groundborne Vibration

The Certified EIR for the CRA Approved Project did not discuss groundborne vibration levels associated with construction-related truck trips. Construction of the Modified Project includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The Modified Project's additional construction would utilize the same haul route identified in the Certified EIR along Sunset Boulevard. The addition of the construction-related truck trips during the Modified Project's additional construction would not substantially increase the heavy duty truck trips that exist along Sunset Boulevard. Therefore, the Modified Project construction-related truck trips would not expose persons to or generate excessive groundborne vibration and impacts related to vibration as a result of the Modified Project's additional construction would be less than significant.

The Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. Further, the additional construction activities for the Modified Project would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase groundborne vibration from construction-related truck trips on a given day. Thus, based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the vibration generated by the construction-related truck trips as a result of the Modified Project's additional construction

would not substantially increase the groundborne vibration generated by the construction period of the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to vibration generated during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's construction-related truck groundborne vibration impact would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to vibration generated during construction.

d. Construction Activity Groundborne Vibration

As set forth in the Certified EIR, vibration levels associated with construction of the CRA Approved Project could exceed the threshold for residences and buildings where people normally sleep and the Certified EIR concluded that the CRA Approved Project's impact to groundborne vibration would be significant and unavoidable on a temporary basis during construction.

The analysis of the Modified Project's potential impacts includes the same construction activities as the CRA Approved Project as well as additional construction associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. The construction groundborne vibration activities for the CRA Approved Project were located throughout the project site and, therefore, the groundborne vibration levels were calculated based on the distances from the project site boundary to the nearest sensitive receptors. For the additional construction that would occur under the Modified Project, the construction groundborne vibration activities would occur as a result of the structural foundation retrofit on the west side of Level 1 of the parking structure to accommodate the new automated steel parking structure. Therefore, the distances utilized for groundborne vibration levels were calculated based on the distances from the construction groundborne vibration activities on the west side of the parking structure to the nearest sensitive receptors.

For the Modified Project's additional construction activities vibration generating equipment would include a jackhammer and loader/backhoe, which would be utilized for the installation and retrofitting for the new automated steel parking structure that includes foundation and structural modifications. Based on this construction equipment, the Modified Project's additional construction period groundborne vibration levels at the two nearest sensitive receptors would be below the threshold of significance. Therefore, for the Modified Project's additional construction, construction-related groundborne vibration would not expose persons to or generate excessive groundborne vibration at the nearest sensitive receptors, and impacts would be less than significant and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. However, because the changes involved in the Modified Project would not reduce or avoid the previously identified significant impact associated with the CRA Approved Project's construction activities, groundborne vibration impacts would

remain significant and unavoidable (but temporary) as concluded in the Certified EIR for the CRA Approved Project.

Nevertheless, because the Modified Project's additional construction activities would not overlap with the construction activities of the CRA Approved Project analyzed in the Certified EIR, the Modified Project's additional construction activities would by itself result in less than significant impacts associated with construction groundborne vibration. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to human annoyance from construction groundborne vibration.

Implementation of Regulatory Compliance Measures CM F-1 and CM F-2, which ensure compliance with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances, as well as restrict construction and demolition to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday, would reduce groundborne vibration impacts to the maximum extent feasible. Additionally, implementation of Mitigation Measures MM F-1.1 and MM F-1.2, which require demolition and construction activities to be scheduled to avoid operating several pieces of equipment simultaneously and the Modified Project's contractor to use power construction equipment with state-of-the-art noise shielding and muffling devices, would further reduce groundborne vibration impacts. Furthermore, Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which ensure all construction equipment engines shall be properly tuned and muffled; construction activities be conducted as far as possible from the nearest sensitive receptors and natural and/or manmade barriers be used to screen such activities from these land uses to the maximum extent possible; the use of construction equipment with the greatest generation potential to be minimized to the maximum extent feasible; a temporary noise barrier be erected between the source and sensitive receptor if construction activities exceed 75 dBA at the property line of the adjacent property and if construction equipment is left stationary and continuous; and an informational sign be posted at the entrance to each construction site, would also reduce groundborne vibration impacts to the maximum extent feasible.

Further, the Certified EIR for the CRA Approved Project anticipated a 24-month construction timeline. Compared to the CRA Approved Project, the Modified Project's additional construction period would last approximately four months, which is not a substantial increase from the CRA Approved Project's construction timeline. In addition, the Modified Project's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase groundborne vibration from construction on a given day. Thus, based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the groundborne vibration impacts as a result of the Modified Project's additional construction would not substantially increase the groundborne vibration impacts for construction of the CRA Approved Project. Therefore, the Modified Project's construction-related groundborne vibration impacts would be within the scope of impacts analyzed in the Certified EIR for the CRA Approved

Project and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction groundborne vibration.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's additional construction activities would by itself result in less than significant impacts associated with construction groundborne vibration and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to human annoyance from construction groundborne vibration.

2. Project Design Features

No Project Design Features are proposed for Noise (Construction).

3. Mitigation Measures

- **MM F-1.1**: Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- **MM F-1.2**: The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- **MM F-1.3**: The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar generators to power equipment rather than diesel or gasoline generators where feasible.
- **MM F-1.6**: Prior to the issuance of building permits for the development of the Modified Project, the Applicant shall provide proof satisfactory to the City Department of Public Works or Department of Building and Safety, as applicable, that all related construction contractors have been required in writing to comply with the City Noise Ordinance, and prior to the development of the Modified Project, the Applicant shall design a Construction Noise Mitigation Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The intent of the Construction Noise Management Plan is to provide the contractor with measures to reduce noise impacts by at least 10 dBA through implementation of the following:
 - Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
 - The Modified Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
 - The construction contractor for the Modified Project's additional construction activities shall use on-site electrical sources or solar

generators to power equipment rather than diesel or gasoline generators where feasible.

- All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers or temporary sound barrier) shall be used to screen such activities from these land uses to the maximum extent possible and the unnecessary idling of such construction activities shall be prohibited.
- To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.
- If noise levels from construction activity are found to exceed 75 dBA at the property line of an adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier, shall be erected between the noise source and receptor.
- An information sign shall be posted at each entrance to the construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Certified EIR Mitigation Measure MM F-1.1: All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

Certified EIR Mitigation Measure MM F-1.2: Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Certified EIR Mitigation Measure MM F-1.3: To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Certified EIR Mitigation Measure MM F-1.4: If noise levels from construction activity are found to exceed 75 dBA at the property line of and adjacent property and construction equipment is left stationary and continuously operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.

Certified EIR Mitigation Measure MM F-1.5: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

4. Finding

Mitigation measures have been incorporated into the Modified Project which substantially lessen the potentially significant impacts related to construction noise and vibration, as identified in the Supplemental EIR. In addition, changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental effect of the Modified Project upon construction noise and vibration including the adoption of the No Automated Steel Parking Structure Alternative in lieu of the Modified Project which would slightly reduce the intensity of the significant noise impact. However, although such measures and changes would reduce the impact, the No Automated Steel Parking Structure Alternative may result in temporary noise and vibration impacts to sensitive uses during construction above the relevant thresholds, and therefore, the No Automated Steel Parking Structure Alternative's construction noise and vibration impacts during construction would be significant and unavoidable, consistent with the conclusion for the Modified Project. Specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of the Findings (Statement of Overriding Considerations), make infeasible additional Mitigation Measures or project alternatives identified in the Final Supplemental EIR.

5. Rationale for Finding

As discussed above, the Certified EIR determined the resulting noise levels from construction of the CRA Approved Project would exceed thresholds of significance for construction noise. Similar to the CRA Approved Project, construction activities for the Modified Project and No Automated Steel Parking Structure Alternative could impact nearby sensitive receptors as construction noise could exceed existing ambient exterior noise levels by more than 10 dBA for more than one day and more than 5 dBA for more than 10 days in a three month period. Implementation of the mitigation measures would reduce the noise levels associated with construction of the Modified Project and No Automated Steel Parking Structure Alternative to the maximum extent that is technically feasible. The Modified Project and No Automated Steel Parking Structure Alternative would incorporate Mitigation Measures MM F-1.1, MM F-1.2, MM F-1.6, and Certified EIR Mitigation Measure MM F-1.1 through Certified EIR Mitigation Measure MM F-1.5, which would reduce construction noise to the maximum extent feasible. The Modified Project's and No Automated Steel Parking Structure Alternative's additional construction activities would also incorporate Mitigation Measure MM F-1.3, which requires the Modified

Project's additional construction activities to utilize on-site electrical sources or solar generators in lieu of diesel or gasoline generators where feasible. Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction noise to the maximum extent feasible, temporary construction-related noise impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise. However, as compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact.

Regarding vibration, the Certified EIR concluded that the CRA Approved Project's impact to groundborne vibration would be significant and unavoidable on a temporary basis during construction. For the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction, construction-related groundborne vibration would not expose persons to or generate excessive groundborne vibration at the nearest sensitive receptors, and impacts would be less than significant and would not substantially increase the CRA Approved Project's impacts related to construction groundborne vibration. However, because the changes involved in the Modified Project and the No Automated Steel Parking Structure Alternative would not reduce or avoid the previously identified significant impact associated with the CRA Approved Project's construction activities, groundborne vibration impacts would remain significant and unavoidable (but temporary) as concluded in the Certified EIR for the CRA Approved Project. Despite implementation of the Regulatory Compliance Measures and Mitigation Measures, which would reduce construction vibration to the maximum extent feasible, temporary construction-related vibration impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to construction noise.

6. Reference

For a complete discussion of Noise /Vibration (Construction) see Sections IV.F Noise and VI. Alternatives to the Modified Project of the Draft Supplemental EIR and Section II Additions and Corrections to the Draft Supplemental EIR of the Final Supplemental EIR.

B. Land Use

1. Description

The Certified EIR concluded that with implementation of construction-related mitigation measures prescribed in Sections IV.B Air Quality, IV.F Noise, and IV.K.1 Traffic/Transportation in the Certified EIR for the CRA Approved Project, construction related land use impacts would generally be reduced to acceptable levels. The Certified EIR determined implementation of recommended mitigation measures pertaining to air quality, traffic, and noise would further reduce construction impacts upon adjacent land uses. The Certified EIR concluded less than significant land use impacts would occur during construction of the CRA Approved Project associated with construction-related air quality impacts and construction-related traffic impacts after mitigation. Nevertheless, the Certified EIR determined, with implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the CRA Approved Project associated with construction-related noise impacts.

Construction of the Modified Project could cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. These potential effects and recommended Mitigation Measures are discussed in detail in Sections IV.B, Air Quality; IV.F, Noise; and IV.K Traffic/Transportation, of the Draft Supplemental EIR.

Regarding construction related-traffic, the Certified EIR stated traffic impacts during construction would be less than significant with implementation of mitigation measures. Construction-related traffic impacts associated with the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. The construction-related traffic impacts associated with the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be within the scope of impacts for the CRA Approved Project and would not substantially increase the CRA Approved Project's impacts related to construction traffic. Therefore, consistent with the CRA Approved Project, less than significant land use impacts would occur during construction of the Modified Project or the No Automated Steel Parking Structure Alternative associated with construction-related traffic impacts.

Regarding construction related air quality, the construction-related air quality impacts from the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would be considered less than significant, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. Accordingly, the air quality impacts resulting from construction emissions associated with the Modified Project and the No Automated Steel Parking Structure Alternative would be less than significant and within the scope of impacts analyzed for the CRA Approved Project. As compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant

environmental effects or a substantial increase in the severity of previously identified significant effects related to construction-related air quality impacts.

Regarding construction related noise, temporary construction-related noise impacts from the Modified Project and the No Automated Steel Parking Structure Alternative would be considered significant and unavoidable after mitigation, which is consistent with the analysis in the Certified EIR for the CRA Approved Project. However, as compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact. The Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities would not overlap with the construction activities analyzed for the CRA Approved Project in the Certified EIR in a manner that would increase construction noise on a given day. For the Modified Project's and the No Automated Steel Parking Structure Alternative's additional construction activities the construction noise levels associated with the additional construction would be within the CRA Approved Project's construction noise levels and, therefore, would not substantially increase the CRA Approved Project's construction noise levels. Thus, based on the temporary nature and relatively short duration of the construction work involved, it is anticipated that the noise impacts as a result of the additional construction would not substantially increase the noise impacts from construction of the CRA Approved Project. As a result, the Modified Project's and the No Automated Steel Parking Structure Alternative's construction-related noise impact, while significant and unavoidable, would be within the scope of impacts for the CRA Approved Project and would not substantially increase the CRA Approved Project's impacts related to construction noise. Therefore, consistent with the CRA Approved Project, with implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the Modified Project and the No Automated Steel Parking Structure Alternative associated with construction-related noise impacts.

2. Project Design Features

No Project Design Features are proposed for Land Use Planning (Construction).

3. Mitigation Measures

See Certified EIR Mitigation Measure IV.B-1, MM F-1.1, MM F-1.2, MM F-1.3, MM F-1.4, MM F-1.5, MM F-1.6, Certified EIR Mitigation Measure MM F-1.1, Certified EIR Mitigation Measure MM F-1.2, Certified EIR Mitigation Measure MM F-1.3, Certified EIR Mitigation Measure MM F-1.4, Certified EIR Mitigation Measure MM F-1.5, Certified EIR Mitigation Measure MM IV.K.1-2, and Certified EIR Mitigation Measure MM IV.K.2-1.

4. Finding

Mitigation measures have been incorporated into the Modified Project which substantially lessen the potentially significant impacts related to land use construction noise and vibration impacts, as identified in the Supplemental EIR. In addition, changes or alterations have been required in, or incorporated into, the Modified Project which avoid or substantially lessen the significant environmental effect of the Modified Project upon

construction noise and vibration including the adoption of the No Automated Steel Parking Structure Alternative in lieu of the Modified Project which would slightly reduce the intensity of the significant noise impact. However, although such measures and changes would reduce the impact, the No Automated Steel Parking Structure Alternative may result in temporary noise and vibration impacts to sensitive uses during construction above the relevant thresholds, and therefore, the No Automated Steel Parking Structure Alternative's construction land use impacts related to noise and vibration would be significant and unavoidable, consistent with the conclusion for the Modified Project.. Specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of the Findings (Statement of Overriding Considerations), make infeasible additional Mitigation Measures or project alternatives identified in the Final Supplemental EIR.

5. Rationale for Finding

As discussed above, land use impacts associated with the additional construction of the Modified Project and the No Automated Steel Parking Structure Alternative would be less than significant related to construction-related air quality and temporary construction traffic impacts, which is consistent with the CRA Approved Project. Additionally, consistent with the CRA Approved Project, even following the implementation of mitigation measures, significant and unavoidable land use impacts would occur during construction of the Modified Project and the No Automated Steel Parking Structure Alternative associated with construction-related noise impacts. As compared to the Modified Project, the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the construction-related noise impacts. Construction of the Modified Project and the No Automated Steel Parking Structure Alternative would not substantially increase land use impacts identified in the Certified EIR for the CRA Approved Project. Accordingly, as compared to the CRA Approved Project, the proposed Modified Project and the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to temporary disruption of adjacent land uses with increased air quality, noise impacts and temporary construction traffic impacts during construction.

6. Reference

For a complete discussion of Land Use Planning (Construction) see Sections IV.H Land Use Planning and VI. Alternatives to the Modified Project of the Draft Supplemental EIR.

XI. Alternatives to the Project

As a Draft Supplemental EIR to a previously Certified EIR, the Draft Supplemental EIR's alternative analysis provided an overview of the project background, the original project objectives, the revised project objectives and design features of the Modified Project, and a summary of the prior alternatives that were analyzed in the Certified EIR. In addition, based on changed circumstances that have occurred since the Certified EIR was certified, the No Project Alternative was updated for the Modified Project to reflect the fact that the

project site has changed since the Certified EIR was certified and now contains a vacant 22-story, approximately 250-foot high mixed-use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. In addition, in order to provide additional information for decisionmakers, the Draft Supplemental EIR analysis also evaluated a No Automated Steel Parking Structure Alternative. Under this alternative, parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no additional construction would be required to provide parking. The alternatives evaluated in the Certified EIR and Draft Supplemental EIR are summarized below.

A. Summary of Findings

Following the assessment of the alternatives, it is recommended that the No Automated Steel Parking Structure Alternative be adopted in lieu of the Modified Project. As described below, the No Automated Steel Parking Structure Alternative would remove the automated steel parking structure and require the adoption of a parking ordinance. The No Automated Steel Parking Structure Alternative would not impede the attainment of any of the Modified Project objectives and would slightly reduce the intensity of the significant noise impact, however impacts associated with construction noise and vibration would remain significant and unavoidable. Further, based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure within its powers will substantially lessen any significant effect of the No Automated Steel Parking Structure Alternative project, reduce the significant, unavoidable impacts of the No Automated Steel Parking Structure Alternative project to a level that is less than significant, or avoid any significant impact that the No Automated Steel Parking Structure Alternative project will have on the environment

B. Project Objectives

An important consideration in the analysis of alternatives is the degree to which such alternatives would achieve the objectives of the proposed project.

As described in the Certified EIR and restated in the Draft Supplemental EIR, the primary goal of the CRA Approved Project was to fill the demand for high-rise residential living and provide neighborhood-serving retail uses in the Hollywood area of the City of Los Angeles. Specific objectives of the CRA Approved Project included:

- To contribute to the revitalization of the Hollywood Redevelopment Project area by providing an example of "smart growth" infill development consisting of mixed-use retail, office, and residential development which is consistent with the surrounding architectural elements of Sunset Boulevard corridor;
- To retain and incorporate the architectural character of the Sunset Boulevard street frontage by retaining and incorporating various structural

and architectural features of the existing restaurant building that currently occupies the project site;

- To provide on-site parking in a manner that accommodates the project occupant's needs [without] providing more parking than needed in an effort to promote the use of regional transportation modes given the close proximity of two MTA Metro Red Line Stations (Hollywood & Vine and Hollywood & Western) and multiple bus lines consistent with the Land Use Transportation Policy of the Circulation Element of the General Plan;
- To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;
- To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;
- To provide a park in a manner that will provide a safe, attractive and well maintained open space environment;
- To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues;
- To accommodate a portion of the City's workforce housing demands in a manner that contributes to a safe, and livable neighborhood;
- To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;
- To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and open space within a City-designated Redevelopment Area;
- To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");
- To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in proximity to mass transit;
- To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections, limiting large scale automobile access, and providing flex car opportunities and bicycle storage facilities on site;
- To create an environmentally responsible building that will act as a model for energy efficient building in Los Angeles; and

 To provide a high-performance and environmentally efficient mixed-use project with the intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process.

As stated in Section II, Project Description of the Draft Supplemental EIR, similar to the CRA Approved Project's primary goal, the underlying purpose of the proposed Modified Project is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles. To further this underlying purpose the following basic project objectives of the Modified Project are:

- To contribute to the revitalization of the Hollywood Community Plan area by providing an example of "smart-growth" infill development consisting of a mixed-use residential building with office and neighborhood serving retail land uses which is consistent with the surrounding Sunset Boulevard corridor:
- 2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
- 3. To promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level;
- 4. To provide a publicly accessible park in a manner that will provide a safe, attractive and well maintained open space environment; and
- 5. To provide a viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues.

The following Modified Project additional objectives have also been identified.

- 1. To provide on-site parking in a manner that is consistent with City requirements;
- To provide opportunities for retail and office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;
- To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities and active retail storefronts along Sunset Boulevard;
- 4. To create a development with a high-quality urban design;
- 5. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping;

- 6. To eliminate and prevent the spread of blight and deterioration by providing housing, retail and restaurant uses, and open space within a City-designated Redevelopment Area;
- 7. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street");
- 8. To support traffic reduction transportation policies by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;
- 9. To promote a balanced community by providing a mix of land uses including commercial, residential, office and public open space; and
- To encourage the use of alternative modes of transit including bus, subway, walking, and bicycles by enhancing pedestrian connections and providing bicycle storage facilities on site.
- C. CRA Approved Project Alternatives Analysis
 - **1.** Alternative 1: No Project Alternative
 - **a.** Description of the Alternative

Under the No Project Alternative in the Certified EIR, it was assumed that the restaurant at 5939 Sunset Boulevard and associated surface parking areas in operation at the time of the Certified EIR would remain in operation for the foreseeable future. The three residential properties at 1538-1540 Gordon Street were partially vacant and, due to the condition of the buildings, were proposed to be demolished by the CRA Approved Project's applicant. Due to the relatively high costs associated with renovating and reoccupying the existing structures, the Certified EIR determined it was reasonable to assume that under the No Project Alternative the residential properties would be demolished and rebuilt as multi-family housing with three seven-unit, 3-story (45-foot high) multi-family condominium buildings for a total of 21 units, consistent with the zoning and land use regulations. The Certified EIR stated each condominium building would include a below grade parking level with 17 parking spaces.

b. Impact Summary of Alternative

The Certified EIR determined the No Project Alternative would create several reduced environmental impacts as compared to the CRA Approved Project. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (shade/shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The Certified EIR found the No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the No Project Alternative failed to meet most of the CRA Project Objectives. For instance, the No Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area because it would not allow a mixed-use infill development on the site. The No Project Alternative would also fail to accomplish several important CRA Approved Project objectives, including: to provide a park that would serve the public; to promote a mixed-use project compatible with the General Plan, Hollywood Community Plan, and Hollywood Redevelopment Plan; to increase property tax and sales tax revenues for the City; and to provide high-density housing in close proximity to mass transit. In addition, the No Project Alternative would also fail to meet the primary goal of the CRA Approved Project, which is to meet the demand for mid- to high-rise residential living in the Hollywood area of the City of Los Angeles.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The No Project Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (shade/shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the No Project Alternative would fail to meet most of the CRA Project Objectives. The No Project Alternative would not contribute to the revitalization of the Hollywood Redevelopment Project area because it would not allow a mixed-use infill development on the site. The No Project Alternative would also fail to accomplish several important CRA Approved Project objectives, including: to provide a park that would serve the public; to promote a mixed-use project compatible with the General Plan, Hollywood Community Plan, and Hollywood Redevelopment Plan; to increase property tax and sales tax revenues for the City; and to provide high-density housing in close proximity to mass transit. In addition, the No Project Alternative would also fail to meet the primary goal of the CRA Approved Project, which is to meet the demand for mid- to high-rise residential living in the Hollywood area of the City of Los Angeles.

Accordingly, the No Project Alternative fails to meet the CRA Approved Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

- **2.** Alternative 2: By-Right Development Under The Current General Plan And Zoning Designations
 - a. Description of the Alternative

This alternative was selected as a possible scenario for future development of the project site to be consistent with the applicable General Plan land use and zoning designations at the time of the Certified EIR. The objective of this alternative was to define a reduced density project that was as close as possible to a "By-Right Development" that could be developed without any specific variances, deviations or special discretionary approvals from the CRA or Planning. The Certified EIR noted that this alternative presented a theoretical development scenario from a planning and land use perspective with the primary goal of reducing or eliminating the CRA Approved Project's significant and unavoidable impacts. This alternative, did not take into consideration the financial feasibility of construction and development.

The By-Right Development Alternative would include a 166,929 square-foot mixed-use development with 148 dwelling units, 13,500 square feet of commercial retail space (including 5,000 square feet of retail space and 8,500 square feet of restaurant uses). Similar to the CRA Approved Project, the Certified EIR assumed that parking would be provided in three subterranean parking levels beneath the entire project site. A total of 397 parking spaces would be required. This alternative would not provide a park for public use or any office space, which was requested by the CRA in order to retain some of the declining office space inventory in the area.

With respect to scale and massing of the proposed alternative development, the project site would be developed with a three-story (45-foot high) condominium complex fronting Gordon Street and an approximate seven-story building with a six-story residential tower on top of ground floor retail and restaurant uses fronting on Sunset Boulevard. Overall, in comparison to the CRA Approved Project, the By-Right Development Alterative would be a smaller structure

b. Impact Summary of Alternative

The Certified EIR concluded the By-Right Development Alternative would reduce the severity of some of the CRA Approved Project's environmental impacts. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow).

Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the By-Right Development Alternative would fail to meet several of the CRA Approved Project's objectives. For instance, the office space component of the CRA Approved Project would be eliminated in the By-Right Development Alternative, which doesn't fulfill the objective of the CRA Approved Project to provide opportunities for viable creative office space in the Hollywood area. In addition, while this alternative would provide high-density multifamily housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the By-Right Development Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The By-Right Development Alternative would reduce the CRA Approved Project's significant unavoidable impacts for Aesthetics (Shade/Shadow). Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the No Project Alternative would fail to meet most of the CRA Project Objectives.

For instance, the office space component of the CRA Approved Project would be eliminated in the By-Right Development Alternative, which doesn't fulfill the objective of the CRA Approved Project to provide opportunities for viable creative office space in the Hollywood area. In addition, while this alternative would provide high-density, multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Accordingly, the By-Right Development Alternative fails to meet the CRA Approved Project objectives. Therefore, the By-Right Development Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

- 3. Alternative 3: Anticipated Development Under The Proposed Hollywood Community Plan Amendment ("General Plan Amendment Alternative")
 - **a.** Description of the Alternative

At the time of the Certified EIR, the Planning Department was in the process of updating the Hollywood Community Plan. This alternative built upon the land use and zoning designations identified for the project site as shown in the <u>Draft Hollywood CPU Appendix to Matrix</u>, dated February 16, 2006. The Certified EIR noted, that these land use and zoning designations were not final but were presented as a theoretical project alternative for informational purposes only.

Based on the <u>Draft Hollywood CPU Appendix to Matrix</u>, the General Plan designation applicable to the project site would be amended to allow for a development of 216,288 square feet of developed floor area with up to 180 dwelling units, 13,500 square feet of retail and restaurant area, and 45,354 square feet of commercial office. Similar to the CRA Approved Project, parking for this alternative would be provided in three subterranean parking levels beneath the entire project site. A total of 549 parking spaces would be needed to meet all of the parking requirements for the project site. The Proposed General Plan Amendment Alternative would not require any financial subsidies or assistance from the CRA and would not involve any specific zoning variances or adjustments. However, this alternative would not provide any of the public benefits of the CRA Approved Project. For instance, this alternative would not provide the park for public use.

With respect to scale and massing of the proposed alternative, the project site would be developed with a three-story (45-foot high) condominium complex fronting Gordon Street and an approximate 12-story building with a seven-story residential tower on top of a five-level podium structure with ground floor retail and restaurant uses fronting Sunset Boulevard. As the Proposed General Plan Amendment Alternative would be consistent with the underling zoning regulations were the land use and zoning designations to be updated consistent with the <u>Draft Hollywood CPU Appendix to Matrix</u>, it would be compatible with the existing mid-rise residential buildings along Gordon Street. However, the buffer and open space areas created by the proposed public park feature created under the CRA Approved Project would not be provided.

b. Impact Summary of Alternative

The Certified EIR determined the Proposed General Plan Amendment Alternative would reduce the severity of some of the CRA Approved Project's environmental impacts. The

CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). Impacts associated with the General Plan Amendment Alternative would be reduced for Aesthetics (Shade/Shadow) but not to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative.

c. Finding

While the Proposed General Plan Amendment Alternative would reduce the Aesthetics (Shade/Shadow) impact it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. In addition, the Proposed General Plan Amendment Alternative would fail to meet several of the CRA Approved Project's objectives. Because the General Plan Amendment Alternative would not seek any development assistance or incentives from the CRA, the property would be developed in strict conformance with the General Plan and Zoning regulations. Although the Proposed General Plan Amendment Alternative would meet the objective of creating a mixed-use retail/residential development, it would not provide the public park. While this alternative would provide high-density multi-family housing in close proximity to mass transit, it would not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the Proposed General Plan Amendment Alternative described in the Certified EIR and Draft Supplemental EIR.

d. Rationale for Finding

The Proposed General Plan Amendment Alternative would reduce the Aesthetics (Shade/Shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, the Proposed General Plan Amendment Alternative would fail to meet several of the CRA Project Objectives. Because the General Plan Amendment Alternative would not seek any development assistance or incentives from the CRA, the property would be developed in strict conformance with the General Plan and Zoning regulations. Although the Proposed General Plan Amendment Alternative would meet the objective of creating a mixed-use retail/residential development, it would not provide the public park. While this alternative would provide high-density multi-family housing in close proximity to mass transit, it would

not provide as much density as the CRA Approved Project and would thus fall short of the project site's potential to maximize traffic reduction transportation policies

Accordingly, the Proposed General Plan Amendment Alternative fails to meet the CRA Approved Project objectives. Therefore, the Proposed General Plan Amendment Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the Proposed General Plan Amendment Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

4. Alternative 4: North/South Tower Alignment Alternative

a. Description of the Alternative

During the planning and design process for the CRA Approved Project, several architectural and site plan configurations were considered in an effort to maximize the energy efficiency of the CRA Approved Project. One of the alternative designs considered but rejected was developing the podium and residential tower along a north-south axis instead of the east-west alignment that was proposed as part of the CRA Approved Project. The north-south tower alignment was considered for its ability to potentially reduce the scale and massing of the structure along the Sunset Boulevard frontage, to reduce the CRA Approved Project's shadow impacts on neighboring properties, and to open up the view corridor to and from the Hollywood Hills. After running preliminary calculations on this model, it was found that the north-south alignment would result in a less energy efficient building and would increase the future operating costs of the building. Nevertheless, this configuration remains a feasible project alternative to evaluate. In addition, this alternative analyzed the CRA Approved Project assuming the OSF Building façade would be completely demolished. Under this scenario, the architectural façade of the proposed structure would reflect a modern architectural design.

b. Impact Summary of Alternative

The Certified EIR concluded the North-South Alignment Alternative would generally result in the same environmental impacts as the CRA Approved Project for all environmental issue areas except for shade and shadow. The CRA Approved Project was anticipated to result in significant unavoidable impacts in the following issue areas: Aesthetics (shade/shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). The North-South Alignment Alternative would not reduce the CRA Approved Project's significant unavoidable impacts for any of these issues. Impacts associated with Aesthetics (shade/shadow) would be reduced but not to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise

and vibration and operational land use compatibility standards would remain under this alternative. In addition, impacts to energy efficiency and electricity and natural gas demands were anticipated to increase under this alternative; however, not to the extent that any new significant unavoidable impacts would occur.

c. Finding

The North-South Alignment Alternative would reduce the Aesthetics (shade/shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. The North-South Alignment Alternative would meet many of the CRA Approved Project objectives, however it would fail to provide a high-performance and energy-efficient building.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the North-South Alignment Alternative described in the Certified EIR and the Draft Supplemental EIR.

d. Rationale for Finding

The North-South Alignment Alternative would reduce the Aesthetics (Shade/Shadow) impact, however it would not be reduced to the extent that it would avoid a significant unavoidable impact on adjacent land uses. Impacts associated with construction noise and vibration and operational land use compatibility standards would remain significant and unavoidable under this alternative. However, while the North-South Alignment Alternative would meet many of the CRA Approved Project objectives it would fail to provide a high-performance and energy-efficient building.

Accordingly, the North-South Alignment Alternative fails to meet the CRA Approved Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the CRA Approved Project and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the North-South Alignment Alternative, please see Section VI, Alternatives to the Proposed Project, of the Certified EIR and Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

5. CRA Approved Project Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. In addition, Section 15126.6 of the CEQA Guidelines states that: "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. The Certified EIR determined the Environmentally Superior Alternative would be the No Project Alternative. The No Project Alternative would eliminate nearly all of the CRA Approved Project's potentially adverse effects upon the environment as it would maintain the status-quo.

In accordance with the CEQA Guidelines requirement to identify an environmentally superior Alternative other than the No Project Alternative, the By-Right Development Alternative was selected as the Environmentally Superior Alternative in the Certified EIR. Specifically, the By-Right Development Alternative was selected as the environmentally superior alternative because of its ability to avoid the CRA Approved Project's significant and unavoidable shade and shadow impacts upon neighboring properties. In addition, this alternative would result in a less intensive development and would consume less energy and water resources and would generate less wastewater and fewer demands for public utilities and services. However, the Certified EIR determined that the CRA Approved Project is preferable to the By-Right Development Alternative because the By-Right Development Alternative would fail to provide high density housing in proximity to mass transit opportunities in an area with a high level of employment opportunities. While on a project-by-project basis, the environmental impacts under this alternative appear beneficial from a regional perspective, this alternative would result in the displacement of the CRA Approved Project's proposed housing density to other areas within the City and would not entirely eliminate such impacts.

Accordingly, in adopting the statement of overriding considerations for the CRA Approved Project the CRA found that there are no feasible alternatives or feasible mitigation measures that would substantially lessen or avoid any significant environmental effect of the CRA Approved Project. (See CEQA Guidelines Section 15096(g)(2).) The City of Los Angeles made the same finding following its consideration of the CRA Approved Project.

D. Modified Project Alternatives Analysis

The Certified EIR determined the CRA Approved Project would result in significant unavoidable impacts in the following issue areas: Aesthetics (Shade/Shadow), Noise and Vibration (Construction), Cumulative Operational Roadway Noise, and Land Use/Noise (Operational Land Use Compatibility Standards). In adopting the statement of overriding considerations, the CRA found that there are no feasible alternatives or feasible mitigation measures that would substantially lessen or avoid any significant environmental effect of the CRA Approved Project. (See CEQA Guidelines Section 15096(g)(2).) The City of Los Angeles made the same finding following its consideration of the CRA Approved Project.

As discussed in Section I, Introduction/Executive Summary, of the Draft Supplemental EIR, the purpose of the Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Modified Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR for the CRA Approved Project, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

As analyzed in the Supplemental EIR, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project. In addition, some of the significant impacts that were previously identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts of the Modified Project. Specifically, for the Aesthetics (Shade/Shadow) significant impact, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties during the winter months. However, because the Modified Project is a mixed-use residential project located on an infill site within a Transit Priority Area as defined by CEQA, the Modified Project's aesthetic impacts are not considered significant impacts on the environment pursuant to SB 743. Therefore, the Modified Project would result in less-than-significant shade and shadow impacts upon nearby residential properties during the winter months. With regard to Land Use/Noise (Operational Land Use Compatibility Standards), the Certified EIR concluded the CRA Approved Project's operational noise impacts would be significant and unavoidable, as the CRA Approved Project would expose future residents of the project to exterior ambient noise levels that are in the "normally unacceptable" and "clearly unacceptable" CNEL exposure range. Consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The Modified Project would not exacerbate existing environmental conditions because future roadway noise levels with the Modified Project would not exceed the significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the Modified Project. As such, the Modified Project's operational noise impacts associated with exposure of future residents to ambient noise levels that are in the "normally unacceptable" CNEL exposure range would be less than significant. Additionally, the Modified Project's future year with project traffic volumes on local street segments would result in less than significant cumulative operational roadway noise impacts. Thus, the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact would be reduced to less than significant levels under the Modified Project. While the Noise and Vibration (Construction) significant impact identified in the Certified EIR would remain for the Modified Project, as discussed in Section IV.F., Noise and IV.H., Land Use and Planning, of the Draft Supplemental EIR, the Modified Project would not involve a substantial increase in the severity of the previously identified significant impacts to noise or vibration during construction.

Pursuant to CEQA Guidelines Section 15126.6, subd. (b) "[b]ecause an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." Pursuant to CEQA Guidelines Section 15163 the "supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised." As the Modified

Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project, the alternatives analysis prepared for the CRA Approved Project in the Certified EIR needed only to be updated to contain information necessary to make the previous EIR adequate for the project as revised. For the Modified Project's alternatives analysis, the only new information that affects the conclusions in the alternatives analysis from the Certified EIR is that since certification of the Certified EIR the project site has change and is now developed with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. Accordingly, the Draft Supplemental EIR updated the No Project Alternative for the Modified Project to account for these changed project site conditions.

In addition, while not required under CEQA because the Modified Project would not result in new significant effects or substantially more severe significant effects, to provide additional information for decisionmakers the analysis also includes a discussion of a No Automated Steel Parking Structure Alternative. Under this alternative, instead of providing parking in the new automated steel parking structure, approval of a City ordinance would be required that would provide for the reduction of clear space at structural elements in the Modified Project's parking structure and to allow up to 66 percent of the parking stalls to be compact parking stalls. Under the No Automated Steel Parking Structure Alternative, approximately 508 parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no additional construction would be required to provide parking within the project to meet Code requirements.

1. No Project Alternative

a. Description of the Alternative

The project site has substantially changed since the Certified EIR for the CRA Approved Project. The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Compared to the Modified Project, the No Project Alternative would ensure the vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park that currently occupies the project site remain vacant and closed until those uses are demolished. While it is somewhat speculative to assume what would occur if no further discretionary action is taken by the lead agency, it is reasonable to assume the vacant development on the project site would ultimately be required by the City to be demolished

under the No Project Alternative as a matter of public safety. If the project site were instead to remain vacant it could fall into disrepair and would lead to urban blight.

b. Impact Summary of Alternative

The construction activities associated with the demolition of the vacant development would result in air quality and GHG emissions, would generate new noise and vibration impacts, and would increase haul trucks and construction worker vehicle trips on a short-term and temporary basis. The short-term construction impacts of the No Project Alternative were compared to the short-term construction impacts of the Modified Project's additional construction activities. As discussed in Section VI, Alternatives to the Modified Project in the Draft Supplemental EIR, compared to the impacts associated with the additional construction activities under the proposed Modified Project for localized construction emissions, the No Project Alternative would result in higher peak daily construction emissions for all criteria pollutants. With respect to greenhouse gas emissions, the short-term construction impacts associated with the No Project Alternative would generate additional GHG emissions. As such, the short-term construction impacts associated with the No Project Alternative would not be environmentally superior to the additional construction activities necessary for the Modified Project with respect to construction air quality and GHG emissions

In addition, due to the activities involved with demolition of the existing development, the No Project Alternative would still not avoid the CRA Approved Project and Modified Project's significant unavoidable impacts to noise and vibration during construction because demolition of the existing development would generate noise and vibration impacts on surrounding uses.

The Aesthetics (Shade/Shadow), Land Use/Noise (Operational Land Use Compatibility Standards), and Cumulative Operational Roadway Noise impacts identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts for the Modified Project. Therefore, there are no significant impacts in these categories for an alternative to the Modified Project to reduce. While any further development on the project site would be speculative to address, any future development on the project site would likely also have significant unavoidable impacts to noise and vibration during construction due to the proximity of nearby residential land uses. Therefore, the No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. With respect to operations, impacts associated with the ongoing operation of further development on the project site would be speculative to address. As analyzed in the Draft Supplemental EIR, there are no significant operational impacts associated with the proposed Modified Project.

c. Finding

The No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. In addition, the No Project Alternative would fail to accomplish all of the Modified Project's

objectives. The No Project Alternative would fail to provide a publicly accessible park; would not contribute to the revitalization of the Hollywood Community Plan area; would not include affordable housing; would not generate increased property and sales tax revenues for the City; and would fail to provide high-density multi-family housing and jobs in a designated Transit Priority Area. Similar to the No Project Alternative analysis in the Certified EIR for the CRA Approved Project, the underlying purpose of the Modified Project, which is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles, would not be met under the No Project Alternative.

Therefore, pursuant to CEQA Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including considerations identified in Section XIV of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the Draft Supplemental EIR.

d. Rationale for Finding

The No Project Alternative would not be effective in reducing or avoiding the Modified Project's significant and unavoidable impact to construction related noise and vibration. In addition, the No Project Alternative would fail to accomplish all of the Modified Project's objectives. The No Project Alternative would fail to provide a publicly accessible park; would not contribute to the revitalization of the Hollywood Community Plan area; would not include affordable housing; would not generate increased property and sales tax revenues for the City; and would fail to provide high-density multi-family housing and jobs in a designated Transit Priority Area. Similar to the No Project Alternative analysis in the CRA Approved Project, the underlying purpose of the Modified Project, which is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles, would not be met under the No Project Alternative.

Accordingly, the No Project Alternative fails to meet the Modified Project objectives. Therefore, the No Project Alternative is infeasible and less desirable than the Modified and is rejected for the reasons stated above.

e. Reference

For a complete discussion of impacts associated with the No Project Alternative, please see Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

2. No Automated Steel Parking Structure Alternative

a. Description of the Alternative

The project site is currently improved with a vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and a closed approximately 18,962 square-foot public park. The building and public park are closed in compliance with an Order to Vacate issued by the Los Angeles Department of Building

and Safety on March 19, 2015. The building is comprised of an 18-floor residential tower above a four-level above-grade podium structure with three levels of subterranean parking and three levels of above-grade parking.

Compared to the Modified Project, the No Automated Steel Parking Structure Alternative would not include the automated steel parking structure that is proposed to be constructed above the parking area on Level L3 (within the approximate height of Level L4 of the rest of the podium structure), which would include two floors of automated parking. Instead, under the No Automated Steel Parking Structure Alternative, the City would adopt an ordinance that would provide for the reduction of clear space at structural elements in the parking structure and to allow up to 66 percent of the parking stalls to be compact parking stalls. Under the No Automated Steel Parking Structure Alternative, approximately 508 parking spaces would be provided within the three levels of subterranean parking and three levels of above-grade parking that are currently developed on the project site and no new construction would be required to provide parking that meets or exceeds Code required minimums. As discussed in Section IV.K.1 Traffic/Transportation of the Draft Supplemental EIR, providing 508 parking spaces, which would exceed the Code required minimum of 428 parking spaces, would not encourage additional vehicle trips to the project site.

To allow for the development of the Modified Project additional on-site construction is necessary associated with the installation and retrofitting for the new automated steel parking structure and interior building renovations. Additional construction may also be necessary to comply with the building code requirements. Construction of the new automated steel parking structure and interior building renovations would take approximately three to four months. To allow for the development of the No Automated Steel Parking Structure Alternative, additional on-site construction would still be necessary associated with interior building renovations and may also be necessary to comply with the building code requirements, however no additional on-site construction would be necessary for the installation of and retrofitting for the new automated steel parking structure. Additional construction for the No Automated Steel Parking Structure Alternative would be anticipated to take approximately three to four months consistent with the Modified Project; however, the additional construction is anticipated to be generally limited to interior building locations. While some construction activities may occur on the exterior of the building in connection with interior building renovations, the exterior construction activities would be reduced as no substantial changes to the aboveground parking podium are proposed.

b. Impact Summary of Alternative

As compared to the Modified Project's additional construction activities, the No Automated Steel Parking Structure Alternative's additional construction activities would slightly reduce the intensity of the significant noise impact. Like the Modified Project's additional construction activities, the additional construction for the No Automated Steel Parking Structure Alternative would not have a significant vibration impact. However, as concluded in Section IV.F Noise and Section IV.H, Land Use and Planning, the vibration from the construction of the entirely of the Modified Project would remain significant and

unavoidable. There is no change to this conclusion with the No Automated Steel Parking Structure Alternative. However, because the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact, it is considered environmentally superior to the Modified Project.

As discussed above, the Aesthetics (Shade/Shadow), Land Use/Noise (Operational Land Use Compatibility Standards), and Cumulative Operational Roadway Noise impacts identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts for the Modified Project. Therefore, there are no significant impacts in these categories for an alternative to the Modified Project to reduce.

c. Finding

While the significant noise and vibration impact would remain under the No Automated Steel Parking Structure Alternative, the alternative would slightly reduce the intensity of the significant noise impact and is therefore considered environmentally superior to the Modified Project. With respect to meeting the Modified Project objectives, the No Automated Steel Parking Structure Alternative would meet all of the Modified Project objectives to the same extent as the Modified Project. The removal of the automated steel parking structure and adoption of a parking ordinance would not impede the attainment of any of the Modified Project objectives

Therefore, the City finds that this alternative is feasible and meets the Modified Project's objectives to the same extent as the Modified Project.

d. Rationale for Finding

The No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant noise impact, however impacts associated with construction noise and vibration would remain significant and unavoidable under this alternative. In addition, the No Automated Steel Parking Structure Alternative would meet all of the Modified Project objectives to the same extent as the Modified Project. The removal of the automated steel parking structure and adoption of a parking ordinance would not impede the attainment of any of the Modified Project objectives.

Therefore, the City finds that this alternative is feasible and meets the Modified Project's objectives to the same extent as the Modified Project.

e. Reference

For a complete discussion of impacts associated with No Automated Steel Parking Structure Alternative, please see Section VI, Alternatives to the Modified Project, of the Draft Supplemental EIR.

3. Modified Project Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives

evaluated in an EIR. In addition, Section 15126.6 of the CEQA Guidelines states that: "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. While the Environmentally Superior Alternative was addressed in the Certified EIR pursuant to Section 15126.6 of the CEQA Guidelines, to provide additional information for decision makers, an Environmentally Superior Alternative was also evaluated for the two specific alternatives to the Modified Project addressed in the Draft Supplemental EIR. The environmentally superior alternative is the No Automated Steel Parking Structure Alternative because the No Automated Steel Parking Structure Alternative would slightly reduce the intensity of the significant and unavoidable noise impact as compared to the Modified Project because the No Automated Steel Parking Structure Alternative would include less exterior construction activities than the Modified Project. Therefore, the No Automated Steel Parking Structure alternative is the Environmentally Superior Alternative.

XII. Findings regarding General Impact Categories

A. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project will foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines states:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which will remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Certified EIR stated the CRA Approved Project was intended to increase housing and employment opportunities in the Hollywood Area and contribute to the revitalization of the area, which would meet the objectives of the Hollywood Redevelopment Area. The Certified EIR determined the demolition of existing uses and development of the CRA Approved Project would require upgrades to the existing infrastructure which could encourage other developments in the area, thereby contributing to growth. The Certified EIR also stated the CRA Approved Project would provide 311 multi-family residences and approximately 722 new residents to the project area, but that the CRA Approved Project

was consistent with the projected population and housing forecasts for the Hollywood Community Plan Area and would not exceed the maximum allowable dwelling units permitted within the Redevelopment Plan Area. The Certified EIR concluded the CRA Approved Project may induce substantial growth with respect to infrastructure through immediate and gradual upgrades to community facilities. However, the high-density, transit-oriented growth induced by the CRA Approved Project was determined to be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project Area.

Consistent with the CRA Approved Project, the Modified Project is intended to increase housing and employment opportunities in the Hollywood area and to contribute to the revitalization of the area through private investment and the development of commercial and residential uses. The Certified EIR stated the CRA Approved Project would be consistent with the population and housing forecasts. As discussed in Section IV.G. Population, Housing and Employment of the Draft Supplemental EIR, the growth associated with the Modified Project is within the planned population, housing, and employment growth forecasts of SCAG's 2016-2040 RTP/SCS. Further, compared to the CRA Approved Project, the Modified Project would involve the development of fewer residential apartment units and would increase the population by fewer new residents (from 311 dwelling units and 722 new residents for the CRA Approved Project to 299 dwelling units and 693 new residents for the Modified Project). Additionally, as compared to the CRA Approved Project some additional short-term employment opportunities would be generated by construction activity resulting from the installation and retrofitting for the new automated steel parking structure and interior building renovations for the Modified Project. The CRA Approved Project was expected to generate up to 200 - 250 daily construction workers, while the Modified Project's minimal additional construction activities would generate less than 100 additional short-term construction jobs (approximately 83 construction-related jobs). With regard to permanent jobs, the Modified Project would be expected to generate approximately 128 net new employees and approximately 163 gross new employees at the project site, which would be 18 fewer employees than estimated in the Certified EIR. Such economic growth inducing impacts of the Modified Project would meet the objectives of the Hollywood Redevelopment Project Area. Therefore, direct growth from the Modified Project would be within the Certified EIR's growth forecasts for the CRA Approved Project, and the Modified Project's growth would not substantially increase the growth impacts identified in the Certified EIR for the CRA Approved Project.

Like the Modified Project, economic growth inducing impacts of the No Automated Steel Parking Structure Alternative would meet the objectives of the Hollywood Redevelopment Project Area and direct growth from the No Automated Steel Parking Structure Alternative would not substantially increase the growth impacts identified in the Certified EIR for the CRA Approved Project.

Regarding indirect growth during construction, the Certified EIR determined in Section IV.G, Population and Housing, that the employment opportunities provided by the construction of the CRA Approved Project would not likely result in household relocation by construction workers to the vicinity of the project site. Thus, the Certified EIR concluded

the generation of temporary construction jobs would not cause a permanent increase in local population. For the Modified Project, as discussed in Section IV.G. Population, Housing and Employment of the Draft Supplemental EIR, the employment opportunities provided by the construction of the Modified Project are not likely to result in any household relocation by construction workers to the vicinity of the project site. Based on the temporary nature and relatively short duration of the additional construction work involved, it is anticipated that the construction work force would be filled by the local resident population and skilled labor positions that already exist within the greater Los Angeles region. Similar to the CRA Approved Project, it is anticipated that most construction workers would come from the existing construction industry workforce within Los Angeles County, and with contractors that already reside in the surrounding community or would commute from their existing place of residence within the region. This is due to the fact that the work requirements of many construction projects are highly specialized, temporary, and overlapping so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. Therefore, indirect population growth and employment growth impacts associated with construction of the Modified Project would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, indirect population growth and employment growth impacts associated with construction of the No Automated Steel Parking Structure Alternative would be less than significant, which is consistent with the conclusions of the analysis in the Certified EIR for the CRA Approved Project.

As described in Section IV.G, Population and Housing of the Certified EIR for the CRA Approved Project, new jobs in the retail and restaurant industries would not generate indirect population growth within the region because existing residents within the proximity of these types of employment opportunities typically fill these jobs. As such, the Certified EIR determined that the CRA Approved Project's proposed uses would not generate substantial indirect population growth or demand for new housing. As discussed in Section IV.G, Population, Housing and Employment of the Draft Supplemental EIR, the Modified Project's 128 net new employees and 163 gross new employees would be within the planned employment growth forecasts. The Modified Project's net and gross increase in employment would be 18 fewer employees than estimated in the Certified EIR. The Certified EIR also concluded the CRA Approved Project's new employees would be within the planned employment growth forecasts. Thus, the Modified Project's employment growth impacts during operation would be within the impacts concluded in the Certified EIR for the CRA Approved Project, Additionally, similar to the CRA Approved Project, new iobs in the retail and restaurant industries do not typically generate indirect population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. As such, the Modified Project would also not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Like the Modified Project, the No Automated Steel Parking Structure Alternative's employment growth impacts during operation would be within the impacts concluded in

the Certified EIR for the CRA Approved Project and would also not generate substantial indirect population growth or demand for new housing, which is consistent with the analysis in the Certified EIR for the CRA Approved Project.

Consistent with the CRA Approved Project, the Modified Project would develop a mixeduse multi-family residential/commercial/office project within a densely developed urban environment. However, as the Modified Project would develop less dwelling units and less commercial square footage than the CRA Approved Project, the Modified Project would result in less housing and employment opportunities than the CRA Approved Project. Thus, the Modified Project would result in less overall growth than the CRA Approved Project. As discussed above, the Certified EIR concluded that while the CRA Approved Project may induce substantial growth with respect to infrastructure through the immediate and gradual upgrades to community facilities, the high-density, transit-oriented growth induced by the CRA Approved Project would be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project Area. The Modified Project would result in less overall growth than the CRA Approved Project and also be consistent with the objectives of both the Hollywood Community Plan and the Hollywood Redevelopment Project by placing high density housing and commercial land uses in a Transit Priority Area. Therefore, the Modified Project would not spur additional direct or indirect growth in Hollywood other than what is already anticipated in adopted plans, and potential impacts would be less than significant. This is consistent with the analysis in the Certified EIR for the CRA Approved Project and therefore the Modified Project would not involve new significant environmental effects or substantially increase the severity of previously identified significant effects related to growth.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not spur additional direct or indirect growth in Hollywood other than what is already anticipated in adopted plans, and potential impacts would be less than significant. This is consistent with the analysis in the Certified EIR for the CRA Approved Project and therefore the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or substantially increase the severity of previously identified significant effects related to growth.

B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires that an EIR should include the consideration and discussion of significant irreversible environmental changes, which would be caused by implementation of the proposed project. Section 15126.2(c) of the CEQA Guidelines provides:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable

commitments of resources should be evaluated to assure that such current consumption is justified.

The Certified EIR for the CRA Approved Project did not analyze consumption of nonrenewable resources in accordance with Section 15126.2(c) of the CEQA Guidelines. However, the CRA Approved Project analyzed in the Certified EIR would have consumed limited, slowly renewable and nonrenewable resources for (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Similar to the CRA Approved Project, the Modified Project would consume limited, slowly renewable and nonrenewable resources. The limited, slowly renewable and nonrenewable resources the CRA Approved Project and Modified Project would consume would be in the form of raw land, lumber, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), water, and non-renewable fuel (i.e., gas and diesel fuel to power equipment and vehicles during construction and operation).

With respect to land resources, the project site for the CRA Approved and Modified Project occupies an infill lot that was previously developed with prior residential and commercial uses. The project site is located in an urban developed area and is adequately supported by existing infrastructure including roads and public utilities. As such, the CRA Approved Project and Modified Project would not consume raw land or result in the conversion of raw land in a manner that would commit future generations to develop raw land or occupy previously inaccessible areas.

With respect to the utilization and consumption of lumber, aggregate materials, metals and petrochemical construction materials (e.g., plastics) for construction, the CRA Approved Project and Modified Project's consumption of such materials would be satisfied with the existing supply of commercial products already committed to the marketplace. In addition, for the CRA Approved Project consistent with Mitigation Measures provided in the Certified EIR, the CRA Approved Project would divert and recycle construction and demolition debris. The Modified Project would implement a construction and demolition debris recycling program for the purposes of assisting the City in achieving its 50 percent diversion goal pursuant to AB 939 and the Modified Project's additional construction activities would comply with Section 99.05.408.1 of L.A. Green Building Code, effective 2014, which requires that construction waste be reduced by at least 50 percent. Thus, for both the CRA Approved Project and the Modified Project consumption of nonrenewable building materials such as hardwood lumber, aggregate materials, metals, and plastics would be reduced.

Water, which is a slowly renewable resource, would also be consumed during construction and operation of both the CRA Approved Project and Modified Project. As discussed in Section IV.I Public Utilities of the Draft Supplemental EIR, the CRA Approved Project and Modified Project would have less than significant impacts on water supply.

With respect to the consumption and utilization of fossil fuels, the operation of construction equipment and vehicles during both construction and operation would result in the irreversible consumption of nonrenewable resources. However, as discussed in

Section V.E General Impact Categories, Energy Resources of the Draft Supplemental EIR, the CRA Approved Project and the Modified Project's consumption of fuel would not be considered excessive or substantial with respect to regional fuel supplies. Furthermore, as mixed use projects in an urban setting that are in close proximity to alternative modes of transportation, both the CRA Approved Project and the Modified Project would promote an efficient use of fuel for the operational fuel demands associated with the use of vehicles.

Thus, though the CRA Approved Project and Modified Project would consume limited, slowly renewable and nonrenewable resources, the consumption would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment under both the CRA Approved Project and the Modified Project. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consumption of resources in accordance with Section 15126.2(c) of the CEQA Guidelines.

Like the Modified Project, the use of nonrenewable resources for the No Automated Steel Parking Structure Alternative would not result in significant irreversible changes to the environment and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to consumption of resources in accordance with Section 15126.2(c) of the CEQA Guidelines.

C. Energy Conservation

Section 21100(b) of the CEQA Guidelines requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project.

The Certified EIR for the CRA Approved Project did not analyze energy conservation in accordance with Appendix F. However, to provide a comparison to the Modified Project a discussion of the energy conservation of the CRA Approved Project was provided in the Draft Supplemental EIR. As mixed use development projects, both the CRA Approved Project and the Modified Project would use energy during short-term construction activities as well as long-term operational use over the life of the projects in the form of electricity, natural gas, and petroleum. Each fuel type is discussed separately below.

1. Electricity Use

Electricity demands for construction of the CRA Approved Project would be negligible and would be associated with limited lighting and electronic equipment. The electricity used

would be on temporary basis supplied by LADWP and would be substantially less than that required for the CRA Approved Project's operations.

Operation of the CRA Approved Project would require electricity for multiple purposes including, but not limited to heating, ventilation, and air conditioning (HVAC), refrigeration, lighting, electronics, and commercial machinery. As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the annual energy demands of the CRA Approved Project include approximately 3,420,493 kWh of electricity per year. As discussed in Section IV.I Public Utilities of the Draft Supplemental EIR, the Certified EIR for the CRA Approved Project would have complied with the 2005 Title 24 Building Energy Efficiency Standards and proposed additional energy conservation features related to electricity, including installation of energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, incorporating a solid waste reduction recycling program, and incorporating photovoltaic panels to meet a portion of the CRA Approved Project's energy demands. Further, as noted in the Certified EIR, one of the stated project objectives of the CRA Approved Project was to provide a highperformance and environmentally efficient mixed-use project with the intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process. In addition, as discussed in the Certified EIR, the CRA Approved Project would not have an adverse impact on the electrical system and therefore would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity.

Thus, with compliance with 2005 Title 24 Building Energy Efficiency Standards and implementation of the energy efficiency design features, the CRA Approved Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for electricity would be less than significant.

Similar to the CRA Approved Project, electricity demands for construction of the Modified Project would be negligible and would be associated with limited lighting and electronic equipment. The electricity used would be on temporary basis supplied by LADWP and would be substantially less than that required for the Modified Project during operations.

In addition, similar to the CRA Approved Project, operation of the Modified Project would require electricity for multiple purposes including, but not limited to heating, ventilation, and air conditioning (HVAC), refrigeration, lighting, electronics, and commercial machinery. As discussed in Section IV.I, Public Utilities of the Draft Supplemental EIR, the annual energy demands of the Modified Project would include approximately 2,933,723 kWh of electricity per year. This is lower than the estimated annual energy demands for the CRA Approved Project of approximately 3,420,493 kWh electricity per year.

As discussed in Section IV, Public Utilities of the Draft Supplemental EIR, the Modified Project would be required to comply with energy conservation standards pursuant to Title

24 of the California Code of Regulations (CCR). Title 24 standards are updated every three years and each set of successive standards improve energy efficiency from the previous set of standards. The Modified Project would implement the 2008 Title 24 Building Energy Efficiency Standards for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 Building Energy Efficiency Standards – Revised November 25, 2013. Additionally, the Modified Project would implement the 2010 CALGreen Code for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 version of the CALGreen Code (Effective January 1, 2014). The Modified Project's energy efficient features related to electricity would include energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, Energy Star rated appliances within the dwelling units, energy efficient boilers, heaters and air conditioning systems, and incorporating a solid waste reduction recycling program. The Modified Project also would be designed with the intent to achieve the same 2008 LEED Gold rating that was also a goal for the CRA Approved Project.

Since certification of the Certified EIR, a number of laws, regulations and policies have been enacted to promote renewable energy, which will increase the percentage of the Modified Project's electricity that comes from renewable sources. Thus, the sources that provide energy to the Modified Project will continue to be increasing supplied by renewable energy sources during the operational life of the Modified Project.

As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the Modified Project's electricity demands are consistent with existing energy standards and regulations and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Thus, with compliance with Title 24 Building Energy Efficiency Standards, the CALGreen Code, implementation of the Modified Project's energy efficiency design features, and increasing supply of renewable energy sources, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for electricity.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for electricity.

2. Natural Gas

Natural gas is not anticipated to be required for construction of the CRA Approved Project. Any minor amounts of natural gas that may be consumed would be temporary and would be substantially less than that required for the CRA Approved Project's operations.

Operation of the CRA Approved Project would require natural gas for various purposes including, but not limited to heating and cooling, service water heating, and kitchen appliances. As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the annual natural gas demands of the CRA Approved Project include approximately 15,436,416 cubic feet of natural gas per year. The CRA Approved Project would have been required to comply with energy conservation standards pursuant to the 2005 Title 24 Building Energy Efficiency Standards. The CRA Approved Project also proposed additional energy conservation features, including installation of energy efficient lighting, implementing a 20 percent water conservation strategy for indoor and outdoor water use, incorporating a solid waste reduction recycling program, and incorporating photovoltaic panels to meet a portion of the CRA Approved Project's energy demands. In addition, as noted in the Certified EIR, one of the stated project objectives of the CRA Approved Project was to provide a high-performance and environmentally efficient mixed-use project with the intent to achieve a Gold rating through the Leadership in Energy and Environmental Design (LEED)® certification process.

In addition, as discussed in Section IV.I, Public Utilities, of the Certified EIR, the natural gas demands of the CRA Approved Project would be accommodated in accordance with all standards and regulations for the conveyance of natural gas and would be within the available regional supplies. Thus, with compliance with 2005 Title 24 Building Energy Efficiency Standards and implementation of the energy efficiency design features, the CRA Approved Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for natural gas would be less than significant.

Similar to the CRA Approved Project, natural gas is not anticipated to be required for construction of the Modified Project. Any minor amounts of natural gas that may be consumed would be temporary and would be substantially less than that required for the Modified Project's operations.

Similar to the CRA Approved Project, operation of the Modified Project would require natural gas for various purposes including, but not limited to heating and cooling, service water heating, and kitchen appliances. As discussed in Section IV.I, Public Utilities of the Draft Supplemental EIR, the annual energy demand of the Modified Project would include 14,611,368 cubic feet of natural gas per year. This is lower than the estimated annual natural gas demands for the CRA Approved Project of approximately 15,436,416 cubic feet of natural gas per year.

Similar to the CRA Approved Project, the Modified Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Modified Project would implement the 2008 Title 24 Building Energy Efficiency Standards for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 Building Energy Efficiency Standards – Revised November 25, 2013. Additionally, the Modified Project would implement the 2010 CALGreen Code for all existing construction to remain on the project site, and any additional construction activities necessary for the Modified Project would comply with the 2013 version of the CALGreen Code (Effective January 1, 2014). The Modified Project also would be designed with the intent to achieve the same 2008 LEED Gold rating that was also a goal for the CRA Approved Project. As it pertains to natural gas consumption, the Modified Project's energy efficient features include implementing a 20 percent water conservation strategy for indoor and outdoor water use, providing Energy Star rated appliances within the dwelling units, and installing energy efficient boilers and heaters. The reduction in water use and the incorporation of energy efficient appliances, boilers, and heaters would further serve to reduce the Modified Project's demand for natural gas resources.

As discussed in Section IV.I, Public Utilities, of the Draft Supplemental EIR, the natural gas demands of the Modified Project would be accommodated in accordance with all standards and regulations for the conveyance of natural gas and would be within the regional supplies. Thus, with compliance with Title 24 Building Energy Efficiency Standards, the CALGreen Code, and implementation of the Modified Project's energy efficiency design features, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for natural gas.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Accordingly, as compared to the CRA Approved Project, the No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for natural gas.

3. Petroleum Based Fuel (Diesel and Gasoline)

a. Construction

While the Certified EIR for the CRA Approved Project did not analyze energy efficiency or the consumption of petroleum based fuels in accordance with Appendix F of the CEQA Guidelines, Section IV.I, Public Utilities, of the Certified EIR estimated that the CRA Approved Project would consume approximately 269,491 gallons of fuel during construction, including 213,197 gallons of diesel fuel associated with hauling and on-site heavy equipment and 56,294 gallons of gasoline associated with construction worker vehicles commuting to and from the construction site. The Certified EIR determined that, due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of the size and nature of the CRA Approved Project, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies.

Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration, the amount of diesel and petroleum-based gasoline (E10) consumed can be estimated based on CO₂ emissions. The CRA Approved Project's estimated CO₂e emissions are presented in Section IV.D, Greenhouse Gas Emissions of the Draft Supplemental EIR, it is estimated that the construction of the CRA Approved Project would consume approximately 202,012 gallons of fuel, including approximately 61,805 gallons of diesel fuel and 140,206 gallons of gasoline. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Further, the petroleum consumed related to construction of the CRA Approved Project would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. In addition, construction of the CRA Approved Project would equate to approximately 0.00054 percent of the total amount of petroleum that would be used statewide during the course of the CRA Approved Project construction.

Furthermore, the CRA Approved Project's construction activities would be subject to existing laws and regulations in place to reduce the consumption of energy resources, such as those presented in Section IV.B Air Quality of the Draft Supplemental EIR. The CRA Approved Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn reduce the wasteful, inefficient, and unnecessary consumption of energy. Further, due to the fact that the CRA Approved Project would be built on an urban infill site in a Transit Priority Area, construction worker trip and haul truck trip distances are anticipated to be reduced as compared to sites that are not located in urban centers. In this regard, petroleum consumption due to construction worker trips and hauling and vendor trips would be expected to be reduced as compared to construction activities on sites that are not located within infill development areas.

Therefore, the estimated annual fuel demands for the CRA Approved Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA

Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for petroleum during construction would be less than significant.

Using the same fuel consumption factors, and the CO₂ emissions estimates for the Modified Project's construction activities provided in Section IV.D, Greenhouse Gas Emissions of the Draft Supplemental EIR, construction of the Modified Project would consume approximately 186,492 gallons of fuel including approximately 62,645 gallons of diesel fuel and 123,847 gallons of gasoline. A total of approximately 202,012 gallons of fuel would be consumed by the construction of the CRA Approved Project and approximately 186,492 gallons of fuel would be consumed during construction of the Modified Project. As a result, the fuel that would be consumed during the Modified Project's construction would be 15,520 gallons less than the fuel that would be consumed during the construction of the CRA Approved Project. The overall reduction between the Modified Project and the CRA Approved Project is primarily attributed to a prior delayed construction timeline and the resulting improved fuel efficiency factors in construction equipment that occurred during that period of delay.

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Further, the petroleum consumed related to construction of the Modified Project would be typical of construction projects of similar types and sizes and would not necessitate new petroleum resources beyond what are typically consumed in California. In addition, construction of the Modified Project would equate to approximately 0.00042 percent of the total amount of petroleum that would be used statewide during the course of the Modified Project construction.

Furthermore, the Modified Project's construction activities would be subject to existing laws and regulations in place to reduce the consumption of energy resources, such as those presented in Section IV.B Air Quality of the Draft Supplemental EIR. The Modified Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn reduce the wasteful, inefficient, and unnecessary consumption of energy. Further, similar to the CRA Approved Project, the Modified Project would be built on an urban infill site in a Transit Priority Area, and construction worker trip and haul truck trip distances would be reduced as compared to sites that are not located in urban centers. In this regard, petroleum consumption due to construction worker trips and hauling and vendor trips would be expected to be reduced as compared to construction activities on sites that are not located within infill development areas.

As such, the Modified Project's construction would not substantially increase the petroleum use as compared to the CRA Approved Project. Therefore, the estimated annual fuel demands for the Modified Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result

in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the Modified Project's impacts related to energy efficiency for petroleum during construction would be less than significant. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during construction.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the No Automated Steel Parking Structure Alternative's impacts related to energy efficiency for petroleum during construction would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during construction.

b. Operation

During operation, the majority of fuel consumption resulting from the CRA Approved Project would involve the use of motor vehicles traveling to and from the project site. As explained in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the CRA Approved Project's demand for petroleum-based fuels would be approximately 350,627 gallons per year. In comparison to regional supplies, the CRA Approved Project's operations would equate to approximately 0.00188 percent of the total amount of petroleum that would be used statewide annual during operations of the CRA Approved Project.

With respect to reducing the demands upon fossil fuels generated from vehicle trips, as discussed in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the CRA Approved Project proposed to integrate the sustainable design features including: proximity to mass transit; in-fill smart growth, and providing a mix of land uses that would result in an overall reduction in vehicle trips and vehicle miles traveled.

In summary, although the CRA Approved Project would see an increase in petroleum use during operation, vehicles would use less petroleum due to advances in fuel economy over time. Additionally, the CRA Approved would include a variety of features that are expected to reduce the number of vehicles traveling to and from the site during operation. As such, while the CRA Approved Project would generate more vehicle trips when compared to 2006 conditions, it would increase density in an urban infill project located within a major population center that is in close proximity to public transportation systems. When compared with new development projects sited on previously undeveloped land and away from population centers, infill projects are generally expected to involve fewer vehicles miles traveled during operation. Given these considerations, the petroleum consumption associated with operation of the CRA Approved Project would be consistent

with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the CRA Approved Project's impacts related to energy efficiency for petroleum during operations would be less than significant.

Similar to the CRA Approved Project, the majority of fuel consumption resulting from the operation of the Modified Project would involve the use of motor vehicles traveling to and from the project site. As explained in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR, the Modified Project's demand for petroleum-based fuels would be approximately 317,497 gallons per year. In comparison to regional supplies, the Modified Project's operations would equate to approximately 0.0017 percent of the total amount of petroleum that would be used statewide annual during operations of the Modified Project.

Similar to the CRA Approved Project, the Modified Project would implement sustainable design features to reduce petroleum demands, which are discussed in detail in Section V.E. Energy Conservation of the Draft Supplemental EIR.

In summary, similar to the CRA Approved Project, the Modified Project would see an increase in petroleum use during operation. However, over the operational life of the Modified Project vehicles would use less petroleum due to advances in fuel economy over time. Additionally, the Modified Project would include a variety of features that are expected to reduce the number of vehicles traveling to and from the site during operation. As such, while the Modified Project would generate slightly more vehicle trips when compared to the CRA Approved Project it includes numerous additional measures that were not a part of the CRA Approved Project to promote the use of non-vehicular transportation to the site in a transit rich corridor with a pedestrian-friendly frontage. These include a required TDM program, substantial bicycle parking and additional electric vehicle ready parking spaces in the Modified Project's garage. Furthermore, when viewed on a regional scale, the Modified Project is an urban infill project located within a major population center that serves an existing demand for market rate and affordable housing products. When compared with new development projects sited on previously undeveloped land and away from population centers, infill projects are generally expected to involve fewer vehicles miles traveled during operation. Given these considerations, the petroleum consumption associated with the Modified Project would not be considered inefficient or wasteful, and impacts would be less than significant.

Therefore, the estimated annual fuel demands for Modified Project would be consistent with the energy conservation goals identified in Appendix F of the CEQA Guidelines and would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the Modified Project's impacts related to energy efficiency for petroleum during operations would be less than significant. Accordingly, as compared to the CRA Approved Project, the Modified Project would not involve new

significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during operations.

Like the Modified Project, the No Automated Steel Parking Structure Alternative would not result in the wasteful, inefficient, or unnecessary consumption of energy; would not conflict with existing energy standards and regulations; and would not place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Therefore, the No Automated Steel Parking Structure Alternative's impacts related to energy efficiency for petroleum during operations would be less than significant and would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to energy conservation for petroleum during operations.

XIII. Other CEQA Considerations

- 1. The City, acting through the Planning Department, is the "Lead Agency" for the project evaluated in the Supplemental EIR. The City finds that the Supplemental EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Supplemental EIR for the proposed project, that the Draft Supplemental EIR which was circulated for public review reflected its independent judgment and that the Final Supplemental EIR reflects the independent judgment of the City.
- 2. The Supplemental EIR evaluated or imposed mitigation measures for the following potential proposed project and cumulative environmental impacts: Aesthetics (Views, Light and Glare, and Shade/Shadow); Air Quality; Geology and Soils; Greenhouse Gas Emissions; Cultural Resources; Noise; Population, Housing, and Employment; Land Use Planning; Public Utilities (Water, Wastewater, Energy, Solid Waste); Public Services (Police Services, Fire Protection, Recreation and Parks, Schools); Traffic/Transportation; Parking; and Hazardous Materials/Risk of Upset. Additionally, the Supplemental EIR considered, in separate sections, Growth Inducing Impacts, Significant Irreversible Environmental Changes, and Energy Conservation. The significant environmental impacts of the proposed project and the alternatives were identified in the Supplemental EIR.
- 3. The City finds that the Supplemental EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the proposed project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft Supplemental EIR. The Final Supplemental EIR was prepared after the review period and responds to comments made during the public review period.
- 4. The Planning Department evaluated comments on environmental issues received from persons who reviewed the Draft Supplemental EIR. In accordance with CEQA, the Planning Department prepared written responses describing the

disposition of significant environmental issues raised. The Final Supplemental EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft Supplemental EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Supplemental EIR.

- 5. The Final Supplemental EIR documents changes to the Draft Supplemental EIR and accordingly provides additional information that was not included in the Draft Supplemental EIR. Having reviewed the information contained in the Draft Supplemental EIR, the Final Supplemental EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that will require recirculation of the Draft Supplemental EIR, or that will require preparation of another supplemental or subsequent EIR. Specifically, the City finds that:
 - The Responses to Comments contained in the Final Supplemental EIR fully considered and responded to comments claiming that the proposed project will have significant impacts or more severe impacts not disclosed in the Draft Supplemental EIR and include substantial evidence that none of these comments provided substantial evidence that the proposed project will result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft Supplemental EIR.
 - The City has thoroughly reviewed the public comments received regarding the proposed project and the Final Supplemental EIR as they relate to the proposed project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that will require recirculation of the Supplemental EIR prior to its adoption, and has determined that recirculation of the Supplemental EIR is not required.
 - None of the information submitted after publication of the Final Supplemental EIR, including testimony at the public hearings on the proposed project, constitutes significant new information or otherwise requires preparation of another supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final Supplemental EIR, or a feasible mitigation measure or alterative not included in the Final Supplemental EIR.

- 6. The project design features and mitigation measures identified for the proposed project were included in the Draft Supplemental EIR and Final Supplemental EIR. The final project design features and mitigation measures for the proposed project are described in the Mitigation Monitoring Program ("MMP"). Each of the project design features and mitigation measures identified in the MMP is incorporated into the proposed project. The City finds that the impacts of the project have been mitigated to the extent feasible by the project design features and mitigation measures identified in the MMP.
- 7. The responses to the comments on the Draft Supplemental EIR, which are contained in the Final Supplemental EIR, clarify and amplify the analysis in the Draft Supplemental EIR.
- 8. CEQA requires the Lead Agency approving a project to adopt a MMP for the changes to the project, which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the Supplemental EIR as certified by the City and included in the MMP as adopted by the City serves that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of CEQA §21081.6, the City hereby adopts the MMP.
- In accordance with the requirements of CEQA §21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.
- 10. The custodian of the documents or other material which constitute the record of proceedings upon which the City decision is based is the Planning Department.
- 11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Certified EIR and Supplemental EIR, which are incorporated herein by this reference, or is in the record of proceedings in the matter. The City finds and declares based on such evidence that the proposed project analyzed in the Supplemental EIR would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project analyzed in the Certified EIR.
- 12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Supplemental EIR as comprising the proposed project. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the Lead Agency for the project, the EIR is intended to be the basis for compliance with CEQA for each of

the possible discretionary actions by other State and local agencies to carry out the project.

13. The Supplemental EIR is a Project EIR for purposes of environmental analysis of the proposed project. A Project EIR examines the environmental effects of a specific project. The Supplemental EIR serves as the primary environmental compliance document for entitlement decisions regarding the proposed project by the City of Los Angeles and the other regulatory jurisdictions.

XIV. Statement of Overriding Considerations

As explained in Section II, Project Description of the Draft Supplemental EIR, on October 18, 2007, the CRA adopted Resolution No. 7094 that certified that the Final EIR (Certified EIR) was completed in compliance with CEQA and the CEQA Guidelines, that the information contained in the Final EIR and the Erratum to the Final EIR had been reviewed and considered by the Commissioners of the CRA prior to considering the proposed project, and that the Final EIR and the Erratum to the Final EIR reflected the independent judgment and analysis of the CRA. On December 14, 2007, the CRA subsequently adopted Resolution No. 7095 approving CEQA findings for the approval of the project, a statement of overriding considerations, and a mitigation monitoring and reporting program.

In September 2008, the City of Los Angeles approved the land use entitlements for the Sunset and Gordon Mixed-Use Project and as part of the approvals, the Los Angeles City Council considered the information contained in the Certified EIR and adopted findings and adopted the following Statement of Overriding Considerations in accordance with CEQA Section 21081:

"The proposed Sunset and Gordon Mixed-Use Project will result in significant unavoidable impacts, for which alternatives and mitigation measures to reduce the impacts to insignificant levels are not available or feasible for the reasons described in the Final EIR and CEQA findings, in the following environmental impact or issue area(s): shade and shadow, construction related noise and vibration, and ambient noise exposure above land use/noise compatibility standards for multi-family residential uses. Despite these significant impacts which have not been mitigated to below a level of significance, the Planning Commission has balanced the benefits of the Project against the unavoidable significant environmental effects as described in the CEQA Documents and makes the following Statement of Overriding Consideration that the Project will result in the following substantial community benefits, including economic, legal, social, technological, or other benefits, that outweigh and render acceptable the significant effects on the environment that cannot be mitigated to a level less than significant. Specifically such benefits include but are not limited to the following:

Promotes housing choices by providing workforce housing options

- Preserves and increases employment with the creation of new commercial and creative office targeted at the entertainment community
- Promotes a balanced community by providing a mix of land uses including commercial residential, and open space
- Provides a public park of approximately 21,500 square-feet
- Promotes rehabilitation and restoration by preserving key elements of the Peerless Auto Showroom/Old Spaghetti Factory, a vintage 1924 building
- Improves the quality of the environment by constructing to a Leadership on Environment and Energy Design ("LEED") Gold Standard
- Provides temporary construction-related employment opportunities using all union labor with a local area hiring program in place."

As discussed in Section I, Introduction/Executive Summary, of the Draft Supplemental EIR, the purpose of the Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Modified Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR for the CRA Approved Project, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

As discussed in Section XI of the Findings (Alternatives to the Project), following the assessment of the alternatives, it is recommended that the No Automated Steel Parking Structure Alternative be adopted in lieu of the Modified Project. The No Automated Steel Parking Structure Alternative would not impede the attainment of any of the Modified Project objectives and would slightly reduce the intensity of the significant noise impact, however impacts associated with construction noise and vibration would remain significant and unavoidable. The No Automated Steel Parking Structure Alternative would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the CRA Approved Project. In addition, some of the significant impacts that were previously identified in the Certified EIR for the CRA Approved Project are no longer considered significant impacts of the No Automated Steel Parking Structure Alternative.

For the Aesthetics (Shade/Shadow) significant impact, the Certified EIR concluded the CRA Approved Project would result in significant and unavoidable shade and shadow impacts upon nearby residential properties during the winter months. However, because the No Automated Steel Parking Structure Alternative is a mixed-use residential project located on an infill site within a Transit Priority Area as defined by CEQA, the aesthetic impacts are not considered significant impacts on the environment pursuant to SB 743. Therefore, the No Automated Steel Parking Structure Alternative

would result in less than significant shade and shadow impacts upon nearby residential properties during the winter months.

- For the Land Use/Noise (Operational Land Use Compatibility Standards). the Certified EIR concluded the CRA Approved Project's operational noise impacts would be significant and unavoidable, as the CRA Approved Project would expose future residents of the project to exterior ambient noise levels that are in the "normally unacceptable" and "clearly unacceptable" CNEL exposure range. Consistent with recent CEQA case law, impacts arising from exposure of future occupants of a project to existing environmental conditions is not a significant impact upon the environment. Instead, impacts arising from exposure of future residents to existing environmental conditions should be evaluated in the context of whether the project would exacerbate existing environmental conditions that, in turn, would result in a significant impact upon the environment. The No Automated Steel Parking Structure Alternative would not exacerbate existing environmental conditions because future roadway noise levels with the No Automated Steel Parking Structure Alternative would not exceed the significance threshold and the Noise/Land Use compatibility classifications would remain the same with or without the development of the No Automated Steel Parking Structure Alternative. As such, the operational noise impacts associated with exposure of future residents to ambient noise levels that are in the "normally unacceptable" CNEL exposure range would be less than significant.
- For the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact, the No Automated Steel Parking Structure Alternative's future year with project traffic volumes on local street segments would result in less than significant cumulative operational roadway noise impacts. Thus, the CRA Approved Project's significant and unavoidable cumulative operational roadway noise impact would be reduced to less than significant levels under the No Automated Steel Parking Structure Alternative.

While the Noise and Vibration (Construction) significant impact identified in the Certified EIR would remain for the No Automated Steel Parking Structure Alternative, the No Automated Steel Parking Structure Alternative would not involve a substantial increase in the severity of the previously identified significant impacts to noise or vibration during construction. Nevertheless, because the Final Supplemental EIR has identified unavoidable significant impacts that will result from implementation of the No Automated Steel Parking Structure Alternative. CEQA Section 21081 and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a

Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Supplemental EIR, including the reference library to the EIR, and documents and materials that constitute the record of proceedings.

The following impacts are not mitigated to a less than significant level for the No Automated Steel Parking Structure Alternative, as identified in the Supplemental EIR: Noise and Vibration (Construction) as discussed in Section IV.F, Noise and IV.H, Land Use and Planning.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the No Automated Steel Parking Structure Alternative. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the proposed No Automated Steel Parking Structure Alternative, as discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the No Automated Steel Parking Structure Alternative against the No Automated Steel Parking Structure Alternative's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

- The project would provide 299 residential apartment units to meet the demand for mid- to high-rise residential living based on the current and projected housing demand in the City of Los Angeles and the region supporting Mayor Garcetti's Housing Initiative to build 100,000 housing units by 2021.
- The project promotes affordable housing by including 5 percent of the total number of housing units, 15 residential apartment units, at the "Very Low" income level.
- The project promotes a balanced community and contributes to the revitalization of the Hollywood Community Plan by providing an example of "smart-growth" infill development consisting of a mix of land uses which are consistent with the surrounding Sunset Boulevard including 299 residential apartment units, neighborhood-serving uses including approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space, approximately 38,440 square feet of office space, and approximately 18,962 square-feet of park uses.
- The project preserves and increase employment with the creation of approximately 38,440 square feet of new commercial and creative office space targeted at the entertainment community in the Hollywood area of the City of Los Angeles.

- The project improves the quality of the environment by being designed with the intent to achieve the 2008 Leadership on Environment and Energy Design ("LEED") Gold Standard.
- The project provides temporary construction-related employment opportunities using all union labor with approximately 100 short-term construction jobs associated with the additional construction activities.
- The project provides a publicly accessible approximately 18,962 squarefoot park in a manner that will provide a safe, attractive and well maintained open space environment.
- The project supports traffic reduction transportation policies by providing high-density multi-family housing and jobs and developing a robust Transportation Demand Management program which among other features would include transit pass discounts for residents and employees, car sharing services, carpooling incentives, and unbundled parking in a designated Transit Priority Area.
- The project encourages the use of alternative modes of transit including bus, Metro Red Line Rail, walking, and bicycles by enhancing pedestrian connections by improving the signalized intersections at Sunset Boulevard and Gower Street and Sunset Boulevard and Bronson Avenue with Continental Crosswalks and improving the bus stop on the north side of Sunset Boulevard, east of Gordon Street.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract No. 74172, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The project is located within the Hollywood Community Plan, one of 35 Community Plans that comprise the Land Use Element of the General Plan. The Hollywood Community Plan designates the subject property for Regional Center Commercial and High Medium Residential land uses with the corresponding zones of C2, C4, P, PB, RAS3, and RAS4, and R4, respectively. Lots 6 and 12-16 are located in the Hollywood Signage Supplemental Use District (SUD).

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure

including three (3) levels of subterranean parking and three (3) levels of abovegrade parking. The existing building and public park are currently closed due to an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015.

The applicant is seeking approval of Vesting Tentative Tract Map No. VTT-74172 to permit the merger of nine (9) lots consisting of 1.66 net acres (72,154 net square feet) to create one (1) master lot and one (1) airspace lot (above and below grade) for the building, and for the limited dedication and merger of Gordon Street belowgrade at a width of four feet and depth of 48.33 feet.

The applicant is also seeking a concurrent General Plan Amendment to amend the 1988 Hollywood Community Plan to re-designate the portion of the project site located at 1528-1540 N. Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. 2), from High Medium Residential to Regional Center Commercial; a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and building height of approximately 250 feet (22 stories); a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant; an Affordable Housing On-Menu Incentive to allow a 20 percent decrease in the total required amount of usable open space for a project setting aside affordable housing units for Very Low Income Households in conjunction with Parking Option 1; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. With the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed map will consistent with the Hollywood Community Plan. As conditioned herein, in the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider must submit a tract map modification.

The Subdivision Map Act requires the Advisory Agency to find the proposed map be consistent with the General Plan. The proposed tract map is consistent with the General Plan Framework, Hollywood Community Plan, Housing Element, and Mobility Plan 2035 as follows:

Framework Element

GOAL 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.

GOAL 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.

Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public

infrastructure and serves and the residents' quality of life can be maintained or improved.

Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

Policy 3.10.5: support the development of small parks incorporating pedestrianoriented plazas, benches, other streetscape amenities and ,where appropriate, landscaped play areas.

The proposed map is consistent with the Framework Element by creating a master lot and an airspace lot to support the mixed-use development containing 299 dwelling units and approximately 46,110 square feet of commercial space comprised of office, restaurant, and retail areas, thereby providing housing and jobs in the area. Per Bureau of Engineering letter dated June 1, 2018, the proposed tract is currently connected to an existing sewer in the street adjoining the subdivision, and the tract will connect to the public sewer system and will not result in violation of the California Water Code. Per Bureau of Sanitation letter dated June 4, 2018, there are no potential problems to the sewer and storm drain line serving the proposed tract. Per the Department of Water and Power letter dated February 24, 2017, the proposed tract can be supplied with water from the municipal system, and all required water mains have been installed. Additionally, the existing streets are improved with sidewalks, curb, and gutter to serve the tract. As such, the proposed subdivision allows for growth in an area where there is sufficient public infrastructure.

Surrounding properties are developed with multi-family residential, retail, commercial and parking uses. The proposed tract map and mixed-use development provide various uses, including residential, commercial, retail, and restaurant, and are compatible with adjacent land uses. In addition, the proposed master lot is developed with an approximately 18,962-square-foot public park with landscaped areas and benches, which will be maintained on-site to serve existing and future residents, thereby supporting the development of small parks incorporating benches and other streetscape amenities that enhance existing and future residents' lifestyles.

Hollywood Community Plan

Objective 1: To further the development of Hollywood as a major center of population, employment, retail services, and entertainment.

Objective 2: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

As previously mentioned, the proposed tract and mixed-use development supports the development of Hollywood as a major center of population, employment, and retail services by providing various uses, including residential, commercial, retail and restaurant and accommodating population growth through the creation of 299 dwelling units. Additionally, the proposed project will provide market-rate units as well as affordable housing units for Very Low Income households, consisting of 50 studio, 156 one-bedroom and 93 two-bedroom units, thereby providing a range of housing opportunities by type and cost and satisfying the varying needs and desires of residents in the City.

Mobility Plan 2035

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.

Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

The proposed tract is located in a transit rich corridor and close proximity to employment, retail, restaurants, and entertainment, which will promote the use of transit and pedestrian trips in lieu of vehicular trips. The Metro Red Line Hollywood/Vine Station is located approximately one-half mile away from the project site. The Metro Red Line is a 17-mile subway that runs from Union Station in downtown Los Angeles to Highland Avenue and on to North Hollywood in the San Fernando Valley and connects to the Orange Line bus, which travels to Warner Center and Chatsworth at the North Hollywood Station. The Metro Red Line also connects to the Blue Line rail and the Expo Line rail at the 7th/Metro Center Station and the Gold Line rail and Purple Line rail at Union Station. These Metro Lines further connect to other points throughout the City and the greater Los Angeles area. Additionally, the Los Angeles Metropolitan Authority (MTA) routes a number of bus lines with stops conveniently located near the project site, including Bus Line 2 that connects Union Station to the Pacific Palisades and Bus Lines 180/181 and 217 that connects Hollywood to Pasadena and Westchester area.

Additionally, the proposed project will provide a total of 401 bicycle parking spaces, which encourages a different mode of transportation other than vehicles. All long-term bicycle parking spaces will be secured and comply with the City's Bicycle Parking Ordinance. Short-term bicycle parking spaces will be located outside the building on the Sunset Boulevard frontage as well as inside the ground level of the building and parking garage with direct access to the street.

Hollywood Signage and Supplemental Use District (SUD)

The proposed tract does not involve any signs subject to the SUD.

Therefore, in conjunction with the pending General Plan Amendment, Vesting Zone Change, and Height District change, the proposed Vesting Tentative Tract Map would be consistent with the use, density, and area requirements of the requested zone and would therefore be consistent with the Hollywood SUD.

(b) THE DESIGN OR IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

For purposes of a subdivision, design and improvement is defined by Section 66418 of the Subdivision Map Act and LAMC Section 17.02. Design refers to the configuration and layout of the proposed lots in addition to the proposed site plan layout. Pursuant to Section 66427(a) of the Subdivision Map Act, the location of the buildings is not considered as part of the approval or disapproval of the map by the Advisory Agency. Easements and/or access and "improvements" refers to the infrastructure facilities serving the sub division. LAMC Section 17.05 enumerates the design standards for a tract map and requires that each map be designed in conformance with the Street Design Standards and in conformance with the General Plan.

As indicated in Finding (a), LAMC Section 17.05 C requires that the Tract Map be designed in conformance with the zoning regulations of the project site. The site is currently zoned (T)(Q)C2-2D and (T)(Q)R4-1VL. The applicant is seeking a General Plan Amendment to amend the 1988 Hollywood Community Plan to redesignate the portion of the project site located at 1528-1540 N. Gordon Street (Lots 17, 18, and 19 of Bagnoli Tract No. 2), from High Medium Residential to Regional Center Commercial; a Vesting Zone and Height District Change from (T)(Q)C2-2D and (T)(Q)R4-1VL to C2-2D subject to conditions that would permit a total allowable floor area for the entire project site of approximately 324,693 square feet, 299 dwelling units, and building height of approximately 250 feet (22 stories); a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed ground floor restaurant; an Affordable Housing On-Menu Incentive to allow a 20 percent decrease in the total required amount of usable open space for a project setting aside affordable housing units for Very Low Income Households in conjunction with Parking Option 1; and a Site Plan Review for a project which creates, or results in an increase of, 50 or more dwelling units under related Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. With the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed map will be consistent with the Hollywood Community Plan. As conditioned herein, in the event that Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR is not approved, the subdivider must submit a tract map modification.

The applicant requests a Vesting Tentative Tract Map to permit the merger of nine (9) contiguous lots consisting of 1.66 net acres (72,154 net square feet) to create one (1) master lot (no upper and lower limits) and one (1) airspace lot (above and below grade) for the building, and for the limited dedication and merger of Gordon Street below-grade at a width of four feet and depth of 48.33 feet, approximately 0.3 feet below the finished grade of the public sidewalk. The revised tract map was distributed to and reviewed by the various city agencies of the Subdivision Committee that have the authority to make dedication, and/or improvement recommendations. The Bureau of Engineering (BOE) reviewed the tract map for compliance with the Street Design Standards. BOE determined that the City Engineer cannot enforce an existing policy that does not allow encroachments within 10 feet below the finished sidewalk grade for this subdivision, since the existing structure below grade is to remain. In addition, any required street dedication along Gordon Street including a property line cut corner at the intersection of Sunset Boulevard and Gordon Street cannot be obtained at this time, since the existing structure is to remain. However, BOE recommends that the existing parking structure below the public sidewalk along Gordon Street be permitted to be merged with the remainder of the tract map with conditions requiring that consents to the area being merged and waivers of any damages that may accrue as a result of such mergers be obtained from all property owners who might have certain rights in the area being merged and that satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged. Additionally, the applicant is required to record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times. As conditioned, the design and improvements of the proposed subdivision are consistent with the applicable General Plan.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE TYPE OF DEVELOPMENT.

The project site is physically suitable for the proposed type of development. Specifically, the project site is generally level and, according to the memo from the Grading Division of the Department of Building and Safety, is outside of a City of Los Angeles Hillside Area; is exempt or located outside of a State of California liquefaction, earthquake induced landslide, or fault-rupture hazard zone; and does not require any grading or construction of an engineered retaining structure to remove potential geologic hazards. The tract has been approved contingent upon the satisfaction of the Department of Building and Safety, Grading Division prior to the recordation of the map and issuance of any permits. Prior to the issuance of any permits, the project would be required to be reviewed and approved by the Department of Building and Safety and the Fire Department. Therefore, the project site is physically suitable for the proposed type of development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure including three (3) levels of subterranean parking and three (3) levels of abovegrade parking. The existing building and public park are currently closed due to an Order to Vacate issued by the Los Angeles Department of Building and Safety on March 19, 2015. However, the applicant is requesting a Vesting Tentative Tract Map to merge a portion of the public right-of-way below grade on Gordon Street and existing lots, and resubdivide to create a master lot and an airspace lot. The applicant is also seeking other entitlements under Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR. The Vesting Tentative Tract Map and other entitlements will allow the applicant to continue maintaining a 22-story structure consisting of an 18-floor residential tower containing 299 dwelling units and approximately 324,693 square feet of floor area and the 18,962-square-foot public park. As proposed, and in conjunction with the approval of Case No. CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR, the proposed density and height is consistent with the zone and land use designation. The Grading Division of the Department of Building and Safety determined that because of the site's location a Geology/Soils Report were not required for the proposed subdivision. The Bureau of Engineering determined that the tract is connected to an existing sewer in the street adjoining the subdivision. Additionally, prior to the issuance of a demolition, grading or building permit, the project would be required to comply with conditions herein and applicable requirements of the LAMC. As conditioned, the proposed Tract Map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION OR THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The site is currently improved with a vacant 22-story, approximately 250-foot high mixed-use building containing approximately 319,562 square feet of floor area, and an approximately 18,962-square-foot public park. The building is comprised of an 18-floor residential tower above a four-level, above-grade podium structure including three (3) levels of subterranean parking and three (3) levels of above-grade parking. The existing buildings will continue to be maintained on site. There is no habitat conservation plan or natural community conservation plans presently which govern any portion of the project site. There are no protected trees on the project site. The EIR concludes the project site does not contain or support any known species identified as candidate, sensitive, or special status by local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Impacts upon biological resources will

therefore be less than significant and no mitigation measures are required. Therefore, the design of the subdivision would not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

(f) THE DESIGN OF THE SUBDIVISION OR TYPE OF IMPROVEMENTS IS NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

There appears to be no potential public health problems caused by the design or improvement of the proposed subdivision. The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet Statewide ocean discharge standards. The Bureau of Engineering has reported that the proposed subdivision does not violate the existing California Water Code, because the subdivision will be connected to the public sewer system and will have only a minor incremental impact on the quality of the effluent from the Hyperion Treatment Plant. In addition, the EIR fully analyzed the impacts of the project on the existing public utility and sewer systems, facilities and services.

(g) THE DESIGN OF THE SUBDIVISION OR THE TYPE OF IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS, ACQUIRED BY THE PUBLIC AT LARGE, FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

As required by LAMC Section 12.03, the project site has a minimum of 20 feet of frontages along Sunset Boulevard and Gordon Street, which are public streets. The project site consists of nine (9) lots identified as Lots FR 6 (Arb 1) of Paul and Angel Reyes Subdivision of the East 5 Acres of the South East ¼ of the North West ½ of Section 11 Township 1 South Range 14 West SBM Tract; and Lot 12-19 of Bagnoli Tract No. 2 and by Assessor Parcel Map No. 5545-009-031. 5545-009-035, 5545-009-005, 5545-009-006, and 5545-009-007.

There is an easement granted to the City of Los Angeles for public utilities, recorded November 5, 1976 as Instrument No. 3321, located along Gordon Street on Lots 12 and 15. The existing development that will be maintained is constructed around the public utilities easement, and the design of the subdivision and improvements will continue to maintain the easement free and clear of obstructions and in safe conditions for use at all times.

Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of the property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION SHALL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 74172.

VINCENT P. BERTONI, AICP Advisory Agency

KEVIN S. GOLDEN Deputy Advisory Agency

VPB:CTL:KSG:MN:NC

CHRISTINATOY LEE Senior City Planner

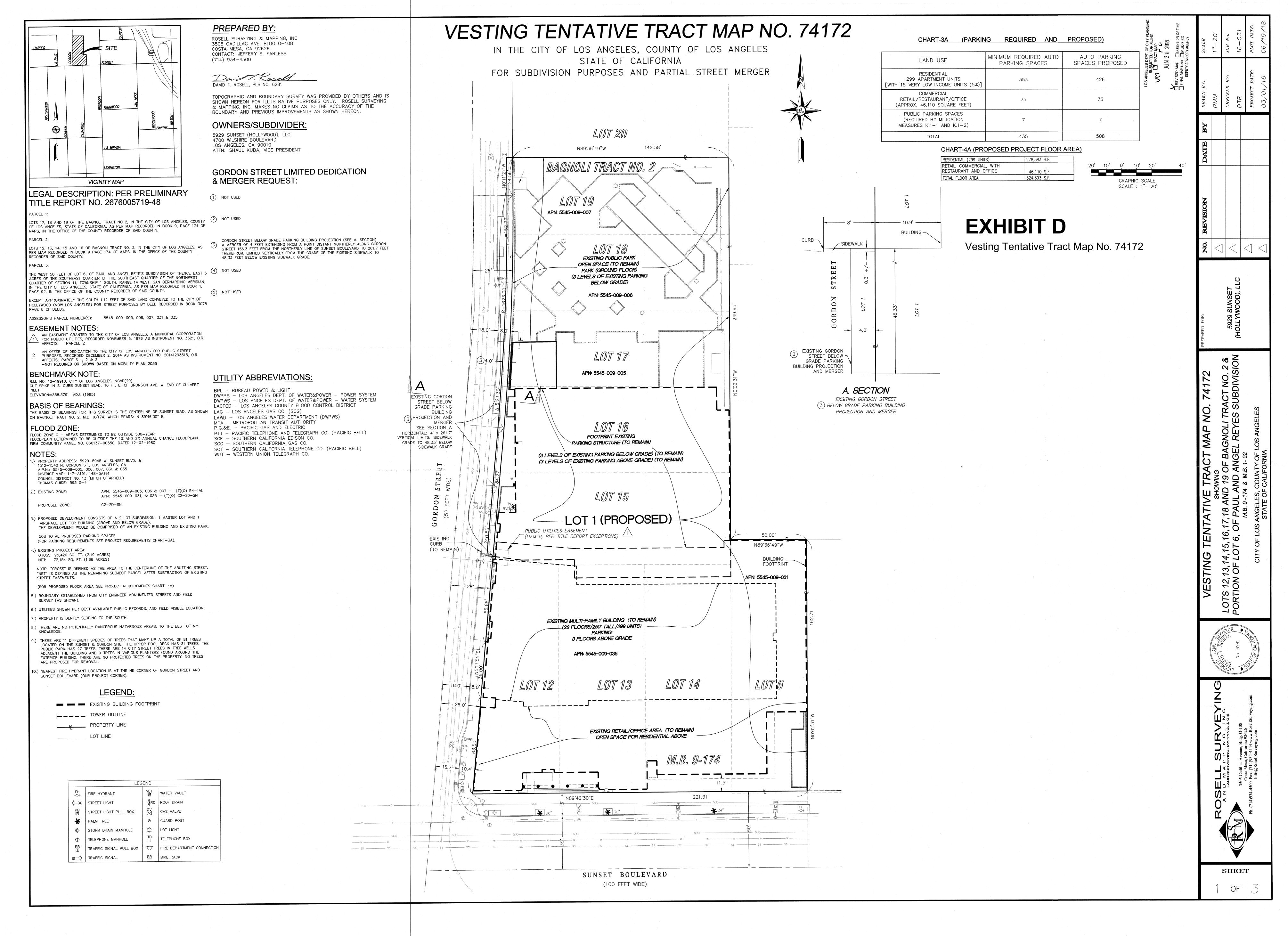
Note: If you wish to file an appeal, it must be filed within 10 calendar days from the decision date as noted in this letter. For an appeal to be valid to the City Planning Commission, it must be accepted as complete by the City Planning Department and appeal fees paid, prior to expiration of the above 10-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

Downtown Office Figueroa Plaza 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012 (213) 482-7077 Valley Office 6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401 (818) 374-5050

West Los Angeles Office 1828 Sawtelle Boulevard, 2nd Floor Los Angeles, CA 90025 (310) 231-2598

Forms are also available on-line at http://planning.lacity.org

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedure Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.



VESTING TENTATIVE TRACT MAP NO. 74172 IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES STATE OF CALIFORNIA FOR SUBDIVISION PURPOSES AND PARTIAL STREET MERGER LOT 1 LOT 1 (MASTER LOT) (MASTER LOT) LOT 2 LOT 1 (MASTER LOT) N89*36'49"W 50.00' N89°36'49"W 50.00' 131.35 **LOT 2**45,958 SQ. FT. LOT 2 15,328 SQ. FT. LOT 2 32,650 SQ. FT. LOT 1 (MASTER LOT) SUNSET L'OULEVARD SUNSET BOULEVARD SUNSET BOULEVARD SUNSET BOULEVARD LEVEL 5 THROUGH 23 1 MASTER LOT (LOT 1) (NO LOWER LIMIT/NO UPPER LIMIT) LOT 2: LEVEL 4 LEVEL. 1 THROUGH 3 P1 THROUGH P4 1 MASTER LOT (LOT 1) (NO LOWER LIMIT/NO UPPER LIMIT) LOT 2: U.E. = 31.7' L.E. = GROUND NOT-TO-SCALE 1 MASTER LOT (LOT 1) (NO LOWER LIMIT/NO UPPER LIMIT) LOT 2: 1 MASTER LOT (LOT 1) (NO LOWER LIMIT/NO UPPER LIMIT) LOT 2: U.E. = GROUND L.E. = -48.33' NOT-TO-SCALE U.E. = 294.8' L.E. = 45.7' NOT-TO-SCALE U.E. = 45.7' L.E. = 31.7' NOT-TO-SCALE

VESTING TENTATIVE TRACT MAP NO. 74172 IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES STATE OF CALIFORNIA FOR SUBDIVISION PURPOSES AND PARTIAL STREET MERGER LOT 1 LOT 1

U.E. = GROUND L.E. = -48.33' LOT 2

LOT 2

MASTER LOT NO LOWER LIMIT

LOT DETAIL (ISOMETRIC VIEW)

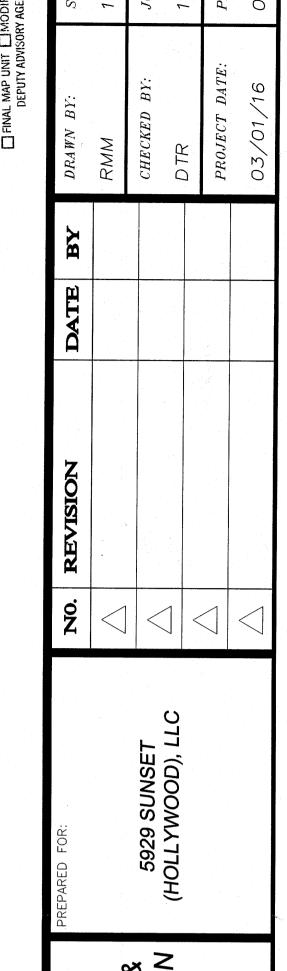
1 MASTER LOT (LOT 1) (NO LOWER LIMIT/NO UPPER LIMIT)

LOT 2:

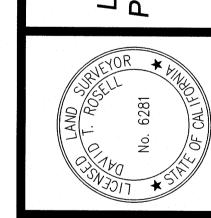
U.E. = 294.8'

L.E. = -48.33' NOT-TO-SCALESEE SHEET 2 FOR ADDITIONAL DETAILS

LOT 1



SHOWING LENTATIVE TRACT MAP NO. 74172
SHOWING
S 12,13,14,15,16,17,18 AND 19 OF BAGNOLI TRACT NO. 2 & SION OF LOT 6, OF PAUL AND ANGEL REYES SUBDIVISIO
M.B. 9-174 & M.B. 1-92



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SHEET

Z OF Z



EXHIBIT E

Email Correspondence from LADOT

Fwd: 5929-5945 W. Sunset Boulevard / 1512-1540 N. Gordon Street

Mindy Nguyen <Mindy.Nguyen@lacity.org>
To: Nuri Cho <nuri.cho@lacity.org>

Fri, Jul 20, 2018 at 11:10 AM

FYI.

----- Forwarded message ------

From: Eddie Guerrero <eddie.guerrero@lacity.org>

Date: Wed, Mar 21, 2018 at 1:44 PM

Subject: 5929-5945 W. Sunset Boulevard / 1512-1540 N. Gordon Street

To: Mindy Nguyen < Mindy.Nguyen@lacity.org>

Mindy,

I was contacted by a traffic consultant on behalf of the subject project regarding the comment letter submitted by Mitchell Tsai to the project SEIR and the specific accusation that the neighborhood impact analysis was incorrectly applied. Since being contacted by the consultant I have reviewed the analysis and confirmed that the traffic study was completed correctly.

The reason the residential component of the project traffic was not considered in the neighborhood impact analysis is because the specific intent of this analysis is to identify "cut-through" traffic that is primarily defined as commercial traffic that uses the local neighborhood street network to "by-pass" congested arterials. Residential traffic that is using the local street network merely as direct access to the project property is not "cut-through" traffic and is therefore not applicable to this analysis.

I informed the contact that I would coordinate with you on this issue and provide whatever input is needed so please advise if this communication will suffice as appropriate redress on this matter or if a more formal response is required and it will be provided.

A copy of the aforementioned comment letter is attached for reference.

If further discussion is needed, please feel free to contact me directly.

Regards.

Eddie Guerrero

Senior Transportation Engineer Metro Development Review

Los Angeles Department of Transportation 100 South Main Street, 9th Floor Los Angeles, California 90012 213.972.8476 This electronic message transmission contains information from the Los Angeles Department of Transportation, which may be confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachment without reading or saving in any manner.

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Mindy Nguyen I Central Project Planning Division

City of Los Angeles | Department of City Planning 200 N Spring Street, Room 621 I Los Angeles CA 90012

E: mindy.nguyen@lacity.org I T: 213 978 1241



FORM GEN. 160A (Rev. 1/82)

EXHIBIT F

LADOT Approval Letter of Supplemental Traffic Analysis

CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

5939 W. Sunset BI DOT Case No. CEN 14-42700

Date:

July 31, 2018

To:

Luciralia Ibarra, Senior City Planner

Department of City Planning

From:

Wes Pringle, Transportation Engineer

Department of Transportation

Subject:

SUPPLEMENTAL TRAFFIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT PROJECT

AT 5939 WEST SUNSET BOULEVARD

On December 27, 2016 the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. Subsequent to the release of the Draft Supplemental Environmental Impact Report (DEIR), a supplemental traffic analysis, prepared by Overland Traffic Consultants (OTC), dated March 2018, was completed to address comments received to the DEIR. After completing a review of the additional analysis, DOT has determined that the report adequately reflects the potential traffic impacts of the proposed project. Therefore, all of DOT's prior recommendations in the December 27, 2016 letter remain fully appropriate and shall remain in effect.

DOT has also reviewed the summary response prepared by OTC, dated July 2018, to the June 19, 2018 comment letter submitted by RK Engineering Group, Inc. to the Final Supplemental EIR and has found the findings of the response to be complete and appropriate.

BACKGROUND

On December 27, 2016 the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on a proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. Subsequent to the release of the Draft Supplemental Environmental Impact Report (DEIR), a supplemental traffic analysis, prepared by Overland Traffic Consultants (OTC), dated March 2018, was completed to address comments submitted to the DEIR.

The proposed project that was the subject of the October 2016 traffic study, included the construction of 299 apartment units, 38,440 square-feet of office use, 3,700 square-feet of restaurant space, 2,495 square-feet of retail use, a 1,475 square-foot coffee shop, and a 18,962 square-foot park and the updated project proposal would not change the project description. The original impact analysis included a review of the proposed project both with and without the consideration of existing land-use credits. In the 2018 supplemental analysis, in order to yield the more conservative result, only the "without credit" scenario was reviewed. The supplemental analysis also considered changes to the ambient growth by extending the buildout year from 2017 to 2018, included an updated related projects list to account for cumulative impacts and, although there are no proposed changes to the project vehicular access, the supplemental analysis also included a queueing analysis of the project driveway. The project trip generation was analyzed both with existing use credits and without.

Under the original traffic analysis, it was determined that two of the twenty analyzed intersections would be significantly impacted by project related traffic and the supplemental analysis indicated the same result with only nominal changes.

ADDITIONAL DISTRIBUTION ANALYSIS

While the October 2016 traffic study correctly followed the trip distribution agreed upon with DOT in the Memorandum of Understanding (MOU), the supplemental analysis provided a more conservative analysis that distributed the project trips differently and analyzed the effects on three additional intersections. The analysis found that the original study findings would not change, but for one additional potential significant impact at the intersection of Sunset Boulevard and Vine Street. The proposed mitigation measures and an enhanced Transportation Demand Management (TDM) plan would mitigate this impact.

A copy of both the response to comments and the DOT original assessment letter and are attached for reference, as **Attachment 1** and **Attachment 2** respectively.

If you have any questions, please contact me at (213) 972-8482.

Attachments

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c: Craig Bullock, Council District No. 13
Bhuvan Bajaj, Hollywood-Wilshire District, DOT
Taimour Tanavoli, Citywide Planning Coordination Section, DOT
Carl Mills, Central District, BOE
Liz Fleming, Overland Traffic Consulting

Attachment 1

PROPOSED MIXED-USE PROJECT AT 5939 WEST SUNSET BOULEVARD – RESPONSE TO COMMENTS

On December 27, 2016, DOT issued a traffic assessment report summarizing the findings of a traffic analysis, dated October 2016, prepared by Overland Traffic Consultants for the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street. The traffic study was prepared consistent with the City's traffic study policies and procedures, and consistent with how all traffic studies for projects within transit-oriented areas are processed in the City. On June 19, 2018, the Department of City Planning received a comment letter with questions about the study from RK Engineering Group.

The main areas of concern of the comments have to do with the trip distribution of the project trips, the need for the inclusion of a parking queueing analysis for the project driveway, and which trips were included as part of the residential street impact analysis. Overland Traffic Consultants has reviewed the comments and issued a response letter.

The October 2016 traffic study was prepared per DOT's Traffic Study Guidelines and followed the agreed upon Memorandum of Understanding (MOU) that was approved and signed prior the preparation of the traffic study. Overland Traffic Consultants thoroughly addressed the comments and has also prepared supplemental analyses to confirm the responses. DOT concurs with the response letter issued by the Overland Traffic Consultants. The response letter accurately indicated that the distribution of the trips was reasonable for the existing street system and conditions. A supplemental analysis was performed that illustrated a more conservative redistribution of the trips could create a potential significant impact at Sunset Boulevard and Vine Street. The impact would be mitigated by an enhanced Transportation Demand Management plan and the improvements already included in the study. Secondly, the response letter adequately answered the question on the driveway queueing analysis and provided a quantitative assessment of this in the supplemental analysis. Finally, the response letter's explanation of the residential street analysis provided sufficient evidence that the residential street segment analysis was prepared per DOT guidelines.

FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

5939 W Sunset Blvd. DOT Case No. CEN 14-42700

Date:

December 27, 2016

To:

Karen Hoo, City Planner Department of City Planning

From:

Wes Pringle, Transportation Engineer

Department of Transportation

Subject:

TRAFFIC IMPACT STUDY FOR THE PROPOSED SUNWEST AND GORDON MIXED-USE DEVELOPMENT LOCATED AT 5929-5945 WEST SUNSET BOULEVARD AND 1512-1540 NORTH GORDON STREET

The Department of Transportation (DOT) has reviewed the traffic analysis dated October 2016 prepared by Overland Traffic Consultants, Inc., for the proposed mixed-use project located on the northeast corner of Sunset Boulevard and Gordon Street in the Hollywood-Wilshire Community Planning Area of the City of Los Angeles. Based on DOT's traffic impact criteria¹, the traffic study included the detailed analysis of twenty intersections and three neighborhood street segments, and determined that two of the study intersections would be significantly impacted by project-related traffic. The results of the traffic impact analysis, which accounted for other known development projects in evaluating potential cumulative impacts and adequately evaluated the project's traffic impacts on the surrounding community, are summarized in **Attachment 1**.

DISCUSSION AND FINDINGS

A. Project Description

This traffic study was conducted as part of a Draft Supplemental EIR prepared for the proposed project. The original EIR was certified by the Community Redevelopment Agency of the City of Los Angeles (CRA) in October 2007. This new traffic analysis referred to herein as the "Modified Project" evaluates proposed modifications as shown in the table below and potential significant traffic impacts with respect to the previously CRA Approved Project.

Land Use	CRA Approved Project	Modified Project
Apartments (DU)	311	299
Office (SF)	40,000	38,440
Restaurant (SF)	8,500	3,700
Retail (SF)	5,000	2,495 Retail & 1,475 Coffee Shop
Park (SF)	21,117	18,962

Per the DOT Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

The newly proposed Modified Project proposes to construct a mixed-use development with 299 apartment units, 38,440 square feet of office, a 3,700 square foot quality restaurant, 2,495 square feet of retail space, a 1,475 square foot coffee shop with no drive thru and an 18,962 square foot public park. The project site is currently improved with a vacant 22-story mixed-use building of approximately 319,562 square feet of floor area and a closed 18,962 square foot public park. The Modified Project will provide a total of 428 (353 residential and 75 commercial) vehicle parking spaces and a total of 401 bicycle parking spaces on-site. Vehicular access to the parking structure will be provided via a driveway on Gordon Street north of Sunset Boulevard with one inbound lane and two outbound lanes. The Modified Project is expected to be completed by 2017.

B. Trip Generation

The Modified Project's traffic impact analysis was conducted under two scenarios. The first scenario was based on net Modified Project trip generation with credits for the uses that existed on the Project Site at the time the traffic analysis was conducted for the CRA Approved Project. In order to present a more conservative estimate of potential traffic impacts, the second scenario was based on net Modified Project trip generation without credits for the prior uses that existed on the Project site. The Modified Project including credits for prior use is estimated to generate 1,410 daily vehicle trips, a net increase of 249 trips in the a.m. peak hour, and a net increase of 149 trips in the p.m. peak. The Modified Project without credits is estimated to generate 2,869 daily vehicle trips, a net increase of 254 trips in the a.m. peak hour, and a net increase of 263 trips in the p.m. peak. The trip generation estimates are based on formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition, 2012. A copy of the trip generation tables with and without credits for prior use can be found in **Attachment 2**.

C. Traffic Impacts

The study concluded that the proposed Modified Project with or without credit for the prior site use would result in significant traffic impacts at the following two intersections:

- 1. Gower Street and Sunset Boulevard (p.m. peak hours)
- 2. Bronson Avenue and Sunset Boulevard (a.m. peak hours)

Traffic mitigation measures under the "Project Requirements" section have been proposed by the developer in order to reduce the traffic impacts at these two locations.

D. <u>Freeway Analysis</u>

The traffic study included a freeway impact analysis that was prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). According to this analysis, the project would not result in significant traffic impacts on any of the evaluated freeway mainline segments. To comply with the Freeway Analysis Agreement executed between Caltrans and DOT in October 2013 and updated in December 2015, the project included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was

necessary beyond the CMP requirements. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses. However, the project did not meet or exceed any of the four thresholds defined in the agreement; therefore, no additional freeway analysis was required.

PROJECT REQUIREMENTS

A. Intersection Improvements

To offset the Modified Project-related significant traffic impacts at the two impacted intersections, the traffic study proposes the following operational improvements which should reduce these traffic impacts to a less than significant level as shown on **Attachment 1**:

1. Gower Street and Sunset Boulevard

Provide an operational northbound right-turn lane on Gower Street; this would allow the northbound approach to accommodate one left-turn lane, one through lane, and one operational right-turn lane. However, this improvement would require the relocation of an existing passenger loading zone southerly on Gower Street south of Sunset Boulevard. Additionally, it would require the removal of up to three parking meters as well as the installation of additional system detector loops along the west side of Gower Street.

2. Bronson Avenue and Sunset Boulevard

Provide an operational southbound right-turn lane on Bronson Avenue; this would allow the southbound approach to accommodate one left-turn lane, one through lane, and one operational right-turn lane. However, this improvement would require the removal of up to four parking spaces as well as the installation of additional system detector loops along the west side of Bronson Avenue.

In addition to the above mentioned intersection improvements, as a project design feature, the developer is proposing to improve both intersections with Continental Crosswalks to improve pedestrian visibility. Sunset Boulevard has been identified as part of DOT's High Injury Network (HIN) and in addition to the above mentioned intersection improvements, the developer is proposing to improve both intersections with Continental Crosswalks at both locations which may or may not require new loop detectors depending on their existing proximity to the current crosswalk. Both, DOT's Hollywood-Wilshire District Office and Council District 13 (CD-13) have agreed to lose the on street parking as long as the proposed project allocates the same number of lost public parking spaces onsite. The applicant should continue to work with DOT's Hollywood-Wilshire District Office and CD-13 to seek approval for the above mentioned improvements. All proposed improvements should be implemented by the applicant through the B-permit process of the Bureau of Engineering (BOE).

Based on DOT's current parking meter policy, payment to DOT for lost parking meter revenues is required. Please contact Mr. Ray Lau, ray.lau@lacity.org, for

the total cost estimate of lost parking meter revenues for the removal of the proposed 3 parking meters along the west side of Gower Street. This cost must be guaranteed <u>prior</u> to the issuance of any building permit and completed <u>prior</u> to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of DOT. Costs related to any relocation of bus zones and shelters, and to modifying or upgrading traffic signal equipment and that are necessary to implement the proposed mitigations shall be incurred by the applicant. In the event the originally proposed mitigation measures become infeasible, substitute mitigation measures of an equivalent cost may be provided subject to approval by DOT, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.

B. Transportation Demand Management (TDM)

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the project's mitigation program first focuses on developing a trip reduction program and on solutions that promote other modes of travel. The traffic analysis has indicated that there are two intersections with significant impacts as a result of the proposed project. These traffic impacts can be significantly reduced to acceptable levels with the implementation of the above mentioned intersection improvements as well as the following TDM program:

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, this project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM program shall be prepared and provided for DOT review <u>prior</u> to the issuance of the first building permit for this project and a final TDM program approved by DOT is required <u>prior</u> to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:

- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator (on-site or off-site);
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Provide on-site transit routing and schedule information;
- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Provide transit and share incentives
- Provide up to two on-site car-share spaces.

C. <u>Neighborhood Traffic Management (NTM) Plan</u>

According to the three residential street impact analysis included in the traffic study, no significant neighborhood traffic impacts were found to potentially experience adverse impacts by project related traffic. A local residential street is considered to be impacted based on an increase in the average daily traffic volumes. The objective of the residential street impact analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from the project. Cut-through trips are measured as vehicles that bypass a congested arterial by instead opting to travel along a residential street.

D. Highway Dedication and Street Widening Requirements

On January 20, 2016, the City Council adopted the Mobility Plan 2035 which is the new Mobility Element of the General Plan. A key feature of the updated plan is to revise 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, etc. Per the new Mobility Element **Sunset Boulevard** has been redesignated to an Avenue I (Major Highway Class II) that would require a 35-foot half-width roadway within a 50-foot half-width right-of-way and **Gordon Street** will continue to be designated Local Street that would require an 18-foot half-width roadway within a 30-foot half-width right-of-way. The applicant should check with BOE's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

E. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

F. Parking Requirements

As previously indicated, the project would provide a total of 428 (353 residential and 75 commercial) vehicle parking spaces and a total of 401 bicycle parking spaces onsite. The developer should check with the Department of Building and Safety on the number of parking spaces needed. Additionally, the developer has agreed to set aside up to 7 on-site spaces designated for public parking to off-set the loss in street parking.

G. Driveway Access and Circulation

The conceptual site plan as illustrated on **Attachment 3** shows that vehicular access to the site would be provided via a single driveway along Gordon Street north of Sunset Boulevard with one inbound lane and two outbound lanes. The study also indicates that a minimum of 60 feet between the property line and the security gate will be provided for queuing. The review of this study does not constitute approval of

the proposed sub-standard driveway dimensions, access and circulation schemes. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 5th Floor, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts, for driveway width and internal circulation requirements. New driveways should be Case 2 - designed with a recommended width of 30 feet for two-way operations or to the satisfaction of DOT. Delivery truck loading and unloading should take place on site with no vehicles having to back into the street.

H. <u>Development Review Fees</u>

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Vicente Cordero at (818) 374-4697.

Attachments

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Chris Robertson, Council District No. 13
 Jeannie Shen, Hollywood-Wilshire District, DOT
 Taimour Tanavoli, Citywide Planning Coordination Section, DOT
 Carl Mills, Central District, BOE
 Jerry Overland, Overland Traffic Consultants, Inc.

Attachment 1

Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 10a
Future Plus Modified Project Traffic Conditions
Analysis with Credits for Prior Uses

			Future (2017)		Future (2017)			
		Peak	Without Project		W	ith Pr	Significant	
No.	<u>Intersection</u>	<u>Hour</u>	<u>CMA</u>	LOS	<u>CMA</u>	LOS	<u>Impact</u>	<u>Impact</u>
1	Cahuenga Bl &	AM	1.026	E	1.028	F	+ 0.002	NO
	Franklin Av	PM	0.880	D	0.881	D	+ 0.001	NO
2	Cahuenga Bl &	AM	0.887	D	0.892	D	+ 0.005	NO
	Hollywood BI	PM	0.811	D	0.814	D	+ 0.003	NO
3	Cahuenga BI &	AM	0.805	D	0.809	D	+ 0.004	NO
	Sunset BI	PM	0.829	D	0.835	D	+ 0.006	NO
4	Vine St &	AM	0.798	С	0.800	D	+ 0.002	NO
	Hollywood BI	PM	0.768	С	0.769	С	+ 0.001	NO
5	Vine St &	AM	0.827	D	0.832	D	+ 0.005	NO
	Sunset BI	PM	0.929	Ε	0.933	Ε	+ 0.004	NO
6	Vine St &	AM	0.749	С	0.752	С	+ 0.003	NO
	Fountain Av	PM	0.819	D	0.821	D	+ 0.002	NO
7	Vine St &	AM	0.907	Ε	0.911	E	+ 0.004	NO
	Santa Monica Bl	PM	0.923	E	0.925	E	+ 0.002	NO
8	Gower St &	AM	0.656	В	0.656	В	+ 0.000	NO
	Franklin Av	PM	0.747	С	0.749	С	+ 0.002	NO
9	Gower St &	AM	0.755	С	0.763	С	+ 0.008	NO
	Hollywood BI	PM	0.743	С	0.748	С	+ 0.005	NO
10	Gower St &	AM	0.747	С	0.762	С	+ 0.015	NO
	Sunset BI	PM	0.916	E	0.926	Ε	+ 0.010	YES

Attachment 1 (cont'd)

Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 10a (continued)
Future Plus Modified Project Traffic Conditions
Analysis With Credits for Prior Uses

		Peak	Future (2017) Without Project		Fu W	Significant		
<u>No.</u>	Intersection	<u>Hour</u>	CMA	LOS	CMA	LOS	<u>Impact</u>	<u>Impact</u>
11	Gower St &	AM	0.729	С	0.739	С	+ 0.010	NO
	Fountain Av	РМ	0.886	D	0.889	D	+ 0.003	NO
12	Gower St &	AM	0.798	С	0.807	D	+ 0.009	NO
	Santa Monica Bl	PM	0.903	Ε	0.907	E	+ 0.004	NO
13A	Gordon St (west)	AM	0.635	В	0.655	В	+ 0.020	NO
	Sunset BI	PM	0.528	Α	0.537	Α	+ 0.009	NO
13B	Gordon St (east)	AM	0.424	Α	0.540	Α	+ 0.116	NO
	Sunset BI	PM	0.468	Α	0.505	Α	+ 0.037	NO
14	Bronson Av &	AM	0.722	С	0.725	С	+ 0.003	NO
	Hollywood BI	PM	0.679	В	0.694	В	+ 0.015	NO
15	Bronson Av &	AM	0.833	D	0.859	D	+ 0.026	YES
	Sunset BI	PM	0.827	D	0.833	D	+ 0.006	NO
16	Bronson Av &	AM	0.572	Α	0.581	Α	+ 0.009	NO
	Santa Monica Bl	PM	0.539	Α	0.544	Α	+ 0.005	NO
17	101 Fwy SB Ran	AM	0.682	В	0.685	В	+ 0.003	NO
	Hollywood BI	PM	0.515	Α	0.522	Α	+ 0.007	NO
18	101 Fwy NB Ran	AM	0.612	В	0.627	В	+ 0.015	NO
	Hollywood BI	PM	0.584	Α	0.592	Α	+ 0.008	NO
19	Van Ness Av &	AM	0.653	В	0.659	В	+ 0.006	NO
	Sunset BI	PM	0.741	C	0.746	С	+ 0.005	NO
20	Wilton PI &	AM	0.651	В	0.664	В	+ 0.013	NO
	Sunset BI	PM	0.699	В	0.702	С	+ 0.003	NO

Attachment 1 (cont'd)

Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 10b
Future Plus Modified Project Traffic Conditions
Analysis Without Credits For Prior Uses

			Future (2017)		Fu			
		Peak	Without Project		w	Significant		
<u>No.</u>	<u>Intersection</u>	<u>Hour</u>	<u>CMA</u>	LOS	<u>CMA</u>	LOS	<u>Impact</u>	<u>Impact</u>
1	Cahuenga BI &	AM	1.026	F	1.028	F	+ 0.002	NO
	Franklin Av	PM	0.880	D	0.883	D	+ 0.003	NO
2	Cahuenga BI &	AM	0.887	D	0.892	D	+ 0.005	NO
	Hollywood BI	PM	0.811	D	0.817	D	+ 0.006	NO
3	Cahuenga BI &	AM	0.805	D	0.809	D	+ 0.004	NO
	Sunset Bl	PM	0.829	D	0.840	D	+ 0.011	NO
4	Vine St &	AM	0.798	С	0.800	D	+ 0.002	NO
	Hollywood BI	PM	0.768	С	0.771	С	+ 0.003	NO
5	Vine St &	AM	0.827	D	0.832	D	+ 0.005	NO
	Sunset BI	PM	0.929	E	0.938	E	+ 0.009	NO
6	Vine St &	AM	0.749	С	0.752	С	+ 0.003	NO
	Fountain Av	PM	0.819	D	0.823	D	+ 0.004	NO
7	Vine St &	AM	0.907	E	0.911	Ε	+ 0.004	NO
	Santa Monica BI	PM	0.923	E	0.927	Ε	+ 0.004	NO
8	Gower St &	AM	0.656	В	0.656	В	+ 0.000	NO
	Franklin Av	PM	0.747	С	0.752	С	+ 0.005	NO
9	Gower St &	AM	0.755	С	0.763	С	+ 0.008	NO
	Hollywood BI	PM	0.743	С	0.753	С	+ 0.010	NO
10	Gower St &	AM	0.747	С	0.762	С	+ 0.015	NO
	Sunset BI	PM	0.916	E	0.935	E	+ 0.019	YES

Attachment 1 (cont'd)

Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 10b (continued)
Future Plus Modified Project Traffic Conditions
Analysis Without Credit For Prior Uses

			Future (2017)		Fu			
		Peak	Without Project		W	Significant		
No.	Intersection	<u>Hour</u>	<u>CMA</u>	LOS	<u>CMA</u>	LOS	<u>Impact</u>	<u>Impact</u>
11	Gower St &	AM	0.729	С	0.740	С	+ 0.011	NO
	Fountain Av	PM	0.886	D	0.893	D	+ 0.007	NO
12	Gower St &	AM	0.798	С	0.807	D	+ 0.009	NO
	Santa Monica BI	PM	0.903	E	0.911	E	+ 0.008	NO
13A	Gordon St (west)	AM	0.635	В	0.655	В	+ 0.020	NO
	Sunset Bl	PM	0.528	Α	0.543	Α	+ 0.015	NO
13B	Gordon St (east)	AM	0.424	Α	0.543	Α	+ 0.119	NO
	Sunset Bl	PM	0.468	Α	0.534	Α	+ 0.066	NO
14	Bronson Av &	AM	0.722	С	0.725	С	+ 0.003	NO
	Hollywood BI	PM	0.679	В	0.706	С	+ 0.027	NO
15	Bronson Av &	AM	0.833	D	0.860	D	+ 0.027	YES
	Sunset BI	PM	0.827	D	0.838	D	+ 0.011	NO
16	Bronson Av &	AM	0.572	Α	0.581	Α	+ 0.009	NO
	Santa Monica Bl	PM	0.539	Α	0.548	Α	+ 0.009	NO
17	101 Fwy SB Ran	AM	0.682	В	0.685	В	+ 0.003	NO
	Hollywood BI	PM	0.515	Α	0.527	Α	+ 0.012	NO
18	101 Fwy NB Ran	AM	0.612	В	0.628	В	+ 0.016	NO
	Hollywood BI	PM	0.584	Α	0.598	Α	+ 0.014	NO
19	Van Ness Av &	AM	0.653	В	0.659	В	+ 0.006	NO
	Sunset Bl	PM	0.741	С	0.750	С	+ 0.009	NO
20	Wilton PI &	AM	0.651	В	0.665	В	+ 0.014	NO
	Sunset BI	PM	0.699	В	0.704	С	+ 0.005	NO

Attachment 1 (cont'd)

Volume to Capacity Ratios (v/c) and Levels of Service (LOS) 5939 West Sunset Boulevard

Table 18a
CMA Summary with Mitigation
Modified Project Analysis With Credits For Prior Uses

	. Intersection	Peak <u>Hour</u>	Future (2017) Without Project		Future (2017) With Project			Significant	Future (2017) With Mitigation			Significant
No.			CMA	LOS	CMA	LOS	Impact	Impact	CMA	LOS	Impact	Impact
10	Gower St &	AM	0.747	С	0.762	С	+ 0.015	NO	0.744	С	-0.003	NO
	Sunset BI	PM	0.916	Е	0.926	Ε	+ 0.010	YES	0.862	D	-0.054	NO
15	Bronson Av&	AM	0.833	D	0.859	D	+ 0.026	YES	0.717	С	-0.116	NO
	Sunset BI	PM	0.827	D	0.833	D	+ 0.006	NO	0.833	D	+ 0.006	NO

Table 18b
CMA Summary with Mitigation
Modified Project Analysis Without Credits For Prior Uses

			Future (2017)		Future (2017)			Future (2017)					
		Peak	Without	t Project		With Project		Significant	With Mitigation			Significant	
No.	Intersection	<u>Hour</u>	<u>CMA</u>	LOS	<u>CMA</u>	LOS	<u>Impact</u>	<u>Impact</u>	<u>CMA</u>	LOS	<u>Impact</u>	<u>Impact</u>	
10	Gower St &	AM	0.747	С	0.762	С	+ 0.015	NO	0.744	С	-0.003	NO	
	Sunset BI	PM	0.916	E	0.935	E	+ 0.019	YES	0.862	D	-0.054	NO	
15	Bronson Av &	AM	0.833	D	0.860	D	+ 0.027	YES	0.718	С	-0.115	NO	
	Sunset BI	PM	0.827	D	0.838	D	+ 0.011	NO	0.837	D	+ 0.010	NO	

Attachment 2

Project Trip Generation Estimates 5939 West Sunset Boulevard

Table 2a
Estimated Modified Project Traffic Generation
Modified Project Analysis With Prior Use Credits

Modified Pr	oject Analy	Daily	AM Peak Hour PM Peak Hour						
Description	Size	Traffic		Total In		Total In		Out	
Proposed Project					Out				
Apartment Transit	299 units 10%	1,988 (199)	152 (15)	30 <u>(3)</u>	122 (12)	185 (19)	120 (12)	65 <u>(7)</u>	
Subtotal Apartment		1,789	137	27	110	166	108	58	
Office	38,440 sf	424	60	53	7	57	10	47	
Transit	10%	<u>(42)</u>	<u>(6)</u>	(5)	(1)	(6)	<u>(1)</u>	<u>(5)</u>	
Subtotal Office	0.405	382	54	48	6	51	9	42	
Community Serving Retail	2,495 sf	107	2	1	1	9	4	5	
Transit Internal Trips	10% 10%	(11) (10)	(O) (O)	(0) (0)	(0)	(1) (1)	(0) (0)	(1) (1)	
Pass-By	50%	(43)	(0) (1)	(0)	(1)	(4)	(2)	(2)	
Subtotal Retail	3070	43	1	1	0	3	2	1	
Quality Restaurant	3,700 sf	333	3	2	1	28	19	9	
Transit	10%	(33)	(O)	(0)	(0)	(3)	(2)	(1)	
Internal Trips	10%	(30)	(0)	(0)	(0)	(3)	(2)	(1)	
Pass-By	10%	<u>(27)</u>	<u>(O)</u>	<u>(0)</u>	<u>(0)</u>	<u>(2)</u>	<u>(1)</u>	<u>(1)</u>	
Subtotal Restaurant		243	3	2	1	20	14	6	
Coffee Shop-No Drive Thru	1,475 sf	1,100	160	82	78	60	30	30	
Transit	10%	(110)	(16)	(8)	(8)	(6)	(3)	(3)	
Internal Trips	20%	(198)	(29)	(15)	(14)	(11)	(5)	(6)	
Pass-By	50%	<u>(396)</u>	<u>(58)</u>	<u>(30)</u>	<u>(28)</u>	(22)	<u>(11)</u>	<u>(11)</u>	
Subtotal Coffee Shop		396	57	29	28	21	11	10	
Public Park	18,962 sf	18	2	1	1	2	1	1	
Transit	10%	<u>(2)</u>	<u>(O)</u>	<u>(0)</u>	<u>(0)</u>	(0)	<u>(0)</u>	<u>(0)</u>	
Subtotal Park		16	2	11	, 1	2	1	1	
Subtotal Proposed		2,869	254	108	146	263	145	118	
Prior Use Removed									
HTO Restaurant (no breakfast)	15,252 sf	1,939	0	0	0	150	90	60	
Transit	10%	(194)	0	0	0	(15)	(9)	(6)	
Pass-by	20%	(349)	0	0	0	(27)	(16)	(11)	
Apartment	8 units	53	4	1	3	5	3	2	
Single Family Home	1 unit	10	1	0	1	1	0	1	
Subtotal Prior Uses		1,459	5	1	4	114	68	46	
NET TRIPS (Proposed - Prior)		1,410	249	107	142	149	77	72	

Attachment 2 (cont'd)

Project Trip Generation Estimates 5939 West Sunset Boulevard

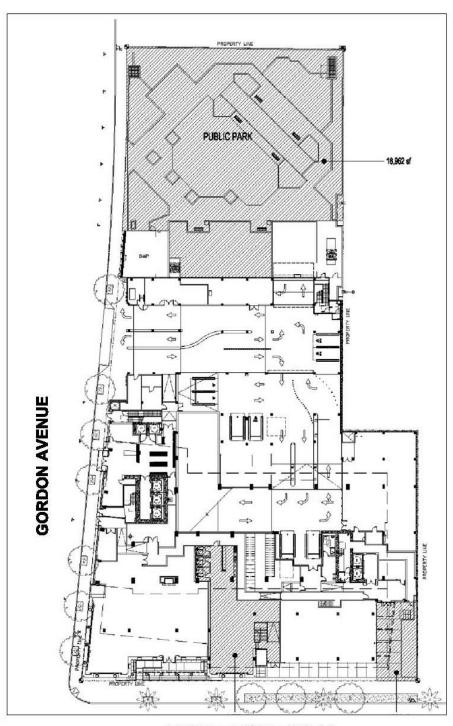
Table 2b
Estimated Modified Project Traffic Generation
Modified Project Analysis Without Credits For Prior Uses

	Daily AM Peak Hour				r PM Peak Hour			
<u>Description</u>	<u>Size</u>	<u>Traffic</u>	Total	<u>In</u>	<u>Out</u>	Total	<u>In</u>	Out
Proposed Project								
Apartment	299 units	1,988	152	30	122	185	120	65
Transit	10%	<u>(199)</u>	<u>(15)</u>	<u>(3)</u>	(12)	(19)	<u>(12)</u>	<u>(7)</u>
Subtotal Apartment		1,789	137	27	110	166	108	58
Office	38,440 sf	424	60	53	7	57	10	47
Transit	10%	<u>(42)</u>	<u>(6)</u>	<u>(5)</u>	<u>(1)</u>	<u>(6)</u>	<u>(1)</u>	<u>(5)</u>
Subtotal Office		382	54	48	6	51	9	42
Community Serving Retail	2,495 sf	107	2	1	1	9	4	5
Transit	10%	(11)	(0)	(0)	(0)	(1)	(0)	(1)
Internal Trips	10%	(10)	(0)	(0)	0	(1)	(0)	(1)
Pass-By	50%	<u>(43)</u>	<u>(1)</u>	<u>(0)</u>	<u>(1)</u>	<u>(4)</u>	(2)	<u>(2)</u>
Subtotal Retail		43	1	1	0	3	2	1
Quality Restaurant	3,700 sf	333	3	2	1	28	19	9
Transit	10%	(33)	(0)	(0)	(0)	(3)	(2)	(1)
Internal Trips	10%	(30)	(0)	(0)	(0)	(3)	(2)	(1)
Pass-By	10%	<u>(27)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(2)</u>	<u>(1)</u>	<u>(1)</u>
Subtotal Restaurant		243	3	2	1	20	14	6
Coffee Shop-No Drive Thru	1,475 sf	1,100	160	82	78	60	30	30
Transit	10%	(110)	(16)	(8)	(8)	(6)	(3)	(3)
Internal Trips	20%	(198)	(29)	(15)	(14)	(11)	(5)	(6)
Pass-By	50%	(396)	(58)	(30)	(28)	(22)	(11)	<u>(11)</u>
Subtotal Coffee Shop		396	57	29	28	21	11	10
Public Park	18,962 sf	18	2	1	1	2	1	1
Transit	10%	<u>(2)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>
Subtotal Park		16	2	1	_ 1	2	1	1
Total Proposed		2,869	254	108	146	263	145	118

Attachment 3

Conceptual Site Plan 5939 West Sunset Boulevard





SUNSET BOULEVARD

INITIAL **SUBMISSIONS**

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the accessed number copies. The Commission's **ROPs** can be http://planning.lacity.org, by selecting "Commissions & Hearings" and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

July 19, 2018

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Re: Sunset and Gordon Mixed-Use Project (CPC-2015-1922-GPA-VZC-HD-

CUB-DB-SPR) (VTT-74172) (ENV-2015-1923-EIR): Response to Coalition to Preserve LA June 20, 2018 Letter and July 6, 2018 Appeal

Dear Mr. Golden, Ms. Nguyen, and Ms. Cho:

We write on behalf of our client, 5929 Sunset (Hollywood), LLC ("5929 Sunset"), regarding the proposed Sunset and Gordon Mixed-Use Project located on Sunset Boulevard in the Hollywood community of Los Angeles (the "Modified Project") and in response to a letter submitted to you on June 20, 2018, by Mitchell Tsai on behalf of the Coalition to Preserve LA ("Coalition") as well as the Coalition's July 6, 2018 appeal of the Advisory Agency's approval of the Vesting Tentative Tract Map (VTT-74172) ("VTTM") for the Modified Project. The arguments in the June 20, 2018 letter and July 6, 2018 appeal are virtually identical. On the morning of the June 20 Advisory Agency and Hearing Officer hearing, Mr. Tsai submitted the Coalition's over 600 page comment letter regarding the Final Supplemental Environmental Impact Report ("Supplemental EIR") for the Modified Project, which conduct was in direct conflict with the City's submittal guidelines that limit day of hearing submissions to two written pages. Subsequently, on June 29, 2018, the Advisory Agency approved the VTTM for the Modified Project and the Coalition appealed the Advisory Agency approval on July 6, 2018. The Coalition's appeal is also over 600 pages and provides all of the same content and raises all of the same claims as the June 20, 2018 letter. Accordingly, we are responding to both submittals with this letter.

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The Coalition's claims are erroneous and were largely addressed in responses to comment from the City set forth in the Final Supplemental EIR. In fact, many of the Coalition's claims appear to have been recycled, verbatim, from comments previously submitted on the Draft Supplemental EIR by Mr. Tsai on behalf of the AIDS Healthcare Foundation in a letter dated October 9, 2017. Regardless of this duplication, and in order to keep the City fully informed of the issues, we have responded to each of the Coalition's claims in Attachment A. These responses, together with the substantial and detailed consideration that has been given to the Modified Project as part of a robust public process, fully support our request that the City Planning department recommend approval of the Modified Project and denial of the Coalition's appeal to the City Planning Commission.

We appreciate your consideration of our responses and would be happy to answer any questions you may have.

Duncan Joseph Moore

Very truly your

of LATHAM & WATKINS LLP

Enclosures

cc: Councilmember Mitch O'Farrell
Craig Bullock, Council District 13
Shaul Kuba, 5929 Sunset (Hollywood), LLC
Katherine Casey, Craig Lawson & Co., LLC
Lauren Paull, Latham & Watkins

ATTACHMENT A: RESPONSE TO COALITION TO PRESERVE LA CLAIMS

I. INTRODUCTION

On June 20, 2018, the Coalition to Preserve LA ("Coalition") submitted a comment letter to the Department of City Planning concerning the Final Supplemental Environmental Impact Report ("Supplemental EIR") for the Sunset and Gordon Mixed-Use Project ("Modified Project"). Subsequently, on July 6, 2018, the Coalition appealed the Advisory Agency's approval of the Modified Project's Vesting Tentative Tract Map ("VTTM"). The Coalition's appeal submittal raises the exact same claims as its June 20, 2018 letter.

Notably, the Coalition appears to have ignored the responses to comment provided in the Modified Project's Final Supplemental EIR. Specifically, many of the Coalition's claims are identical to comments that Mitchell Tsai submitted on the Modified Project's Draft Supplemental EIR on behalf of the AIDS Healthcare Foundation ("AHF"), which the Final Supplemental EIR fully addressed. Further, the new arguments submitted by the Coalition on the Supplemental EIR are erroneous, unsupported by evidence and contradicted by the robust analysis provided by the City's experts in the Final Supplemental EIR. Contrary to the Coalition's claims, the Supplemental EIR was prepared in compliance with the California Environmental Quality Act ("CEQA") and the CEQA Guidelines and does not require revision or recirculation.

In addition to CEQA claims, the Coalition also argues that the City failed to comply with the General Plan, Hollywood Community Plan, and the Los Angeles Municipal Code ("LAMC"). All of the Coalition's claims are without merit or foundation. The Advisory Agency has followed the requirements of the City Charter, LAMC, and Subdivision Map Act ("Map Act") in approving the Modified Project's VTTM.

In sum, the Modified Project has undergone an extremely rigorous public process and environmental review. Substantial evidence in the record supports the Advisory Agency's determination and the conclusions in the Supplemental EIR. Detailed responses to each of the Coalition's erroneous claims are provided below.

II. THE SUPPLEMENTAL EIR COMPLIES WITH CEQA

A. The Supplemental EIR Adequately Analyzes and Discloses All Significant Transportation Impacts

Citing to an analysis prepared by RK Engineering Group, Inc., ("RK Analysis") the Coalition argues that the Supplemental EIR failed to adequately analyze significant transportation impacts. (Coalition June 20, 2018 Letter pp. 4-5, Coalition July 6, 2018 Letter pp. 4-5.) The RK Analysis was included at Exhibit A to both the Coalition's June 20, 2018 letter

¹ As background, the Supplemental EIR was prepared as a supplement to the EIR certified by the former Community Redevelopment Agency of the City of Los Angeles, as the lead agency, on October 18, 2007 (State Clearinghouse No. 2006111135) ("Certified EIR"). The project analyzed in the Certified EIR is referred to as the "CRA Approved Project".

and July 6, 2018 appeal. Overland Traffic Consultants, Inc. prepared a complete response to the RK Analysis dated July 2018, which is included as Exhibit 1 hereto (referred to herein as the "Overland Response"). A summary of the Overland Response is provided herein and demonstrates that the Modified Project would not result in any significant unmitigated transportation impacts.

1. The Supplemental EIR Adequately Discloses the Modified Project's Impact on Residential Streets

Citing to the RK Analysis, the Coalition claims that the Supplemental EIR fails to disclose a significant impact on neighborhood streets because the analysis excluded traffic generated by the residential portion of the Modified Project as part of its residential street segment analysis. (Coalition June 20, 2018 Letter p. 4, Coalition July 6, 2018 Letter p. 4.) Contrary to the Coalition's claims, as explained in the Final Supplemental EIR in Section III.B Response to Comment Letters page III.B-74 – 75 (Response to Comment 5A.29) as well as the Overland Response, the residential street analysis was conduced fully in compliance with CEQA, the CEQA Guidelines, and Los Angeles Department of Transportation ("LADOT") polices, procedures and guidelines, and no significant impact from Modified Project traffic would result.

The LADOT Traffic Study Policies and Procedures, August 2014 and updated Transportation Impact Study Guidelines, December 2016 provide thresholds for the residential street segment impact analysis requirements and impact identification. The LADOT Traffic Study Policies and Procedures, August 2014 state:

Commercial projects may be required to conduct residential street impact analysis. A local residential street can be potentially impacted based on an increase in the average daily traffic volumes. The objective of the residential street analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from a Project. Cut-through trips are measured as vehicles that bypass a congested arterial or intersection by instead opting to travel along a residential street.

(Traffic Study Policies and Procedures, p. 16.) In addition, the Traffic Study Policies and Procedures state that:

When selecting residential street segments for analysis during the traffic study scoping process, all of the following conditions must be present:

- the project is a nonresidential development and not a school.

(Traffic Study Policies and Procedures, p. 16.) The December 2016 Transportation Impact Study Guidelines reiterate these same statements. Therefore, consistent with LADOT procedures and guidelines a neighborhood traffic analysis must be completed for commercial projects but is not required for residential projects. This is because the purpose of a residential street segment analysis is to determine whether new commercial uses are causing intrusion into a residential neighborhood, and not because of new residents. Because the Modified Project has both residential and commercial

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components, the Modified Project's Traffic Study was required to evaluate potential cutthrough traffic on residential streets of its commercial component only. This approach is consistent with how other traffic studies of mixed-use projects are conducted in the City of Los Angeles.^{2,3,4,5}

To support its claim that the analysis should include the residential trips, the Coalition cites to outdated language from the 2009 CEQA Guidelines Appendix G asking whether the project would "[c]ause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?" (Coalition June 20, 2018 Letter p. 4, Coalition July 6, 2018 Letter p. 4.) Contrary to the Coalition's inaccurate citation, the current CEQA Appendix G, XVI Transportation/Traffic asks, would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Accordingly, the CEQA Guidelines' Appendix G provides that the focus of the analysis is the performance of the entire circulation system based on applicable plans and policies not whether there is an increase in vehicle trips. This change to the CEQA Guidelines Appendix G was implemented effective March 18, 2010 in response to Senate Bill 97, which directed the Natural Resources Agency to develop certain amendments to the CEQA Guidelines. The traffic and transportation language in Appendix G was amended to focus on a project's effect on the overall circulation system instead of merely an increase in traffic trips. The Natural Resources Agency made this change because increases in traffic are not necessarily indicators of a potentially significant environmental impact. For instance, some projects that improve the effectiveness of the circulation system can actually result in an increase in vehicle traffic. In amending CEQA Guidelines Appendix G, the Natural Resources Agency recognized a lead agency's discretion to select a methodology to evaluate the impacts of a project on the circulation system as a whole. The City's decision to focus only on the commercial trips for the residential street segment

City of Los Angeles Department of Transportation, LADOT Approval Letter for the Transportation Impact Assessment for the Proposed Mixed-Use Development Located at 800 South Western Avenue (CPC-2016-3608-GPAJ-ZCJ-HD-DB-MCUP-CU-SPR), dated August 7, 2017,

City of Los Angeles Department of Transportation, LADOT Approval Letter for the Transportation Impact Assessment for the Mixed-Use Project Located at 1350 North Western Avenue (ENV-2016-4544-EAF/DIR-2016-4510-DB-WDI-SPR), dated July 11, 2017.

City of Los Angeles Department of Transportation, LADOT Approval Letter for the Transportation Impact Assessment for the Proposed Mixed-Use Project Located at 3700 West Wilshire Boulevard (ENV- 2016-2580-EAF /CPC-2016-2579-VZC-BL-MCUP-ZAD-SPR /VTT-74191), dated November 23, 2016.

City of Los Angeles Department of Transportation, LADOT Approval Letter for the Transportation Impact Assessment for the Proposed Mixed-Use Project at 6901 Santa Monica Boulevard (<u>CORRECTED</u>), dated August 5, 2015.

analysis is consistent with CEQA Guidelines Appendix G and reflects the City's independent judgment about how to evaluate impacts to the entire circulation system.

Therefore, for the reasons stated above the Modified Project would not have a significant impact on local residential streets and the street segment analysis was conduced in compliance with applicable LADOT policies and CEQA and the CEQA Guidelines.

2. The Modified Project Would Not Significantly Impact the Intersection of Sunset Boulevard and Vine Street

Citing to the RK Analysis, the Coalition claims that the Supplemental EIR fails to disclose a significant impact at the intersection of Sunset Boulevard and Vine. (Coalition June 20, 2018 Letter pp. 4-5, Coalition July 6, 2018 Letter p. 5.) As explained in detail in the Overland Response, the Modified Project would not have a significant impact at Sunset Boulevard and Vine Street.

As part of the Final Supplemental EIR, Overland Traffic Consultants prepared the March 2018 Sunset & Gordon Mixed Use Project Supplemental Traffic Analysis ("Supplemental Traffic Analysis"). As detailed in the Supplemental Traffic Analysis and restated in the Overland Response, the Supplemental Traffic Analysis determined that even with a conservative redistribution of the Modified Project's traffic, which relocated trips north of Sunset Boulevard on Vine Street and Argyle Avenue, the Modified Project would have a less than significant traffic impact to the intersection of Sunset Boulevard and Vine Street with the incorporation of feasible mitigation.

Nonetheless, the Coalition argues without citation or support that more of the Modified Project's trips are likely to use Vine Street north of Sunset Boulevard than was assumed as part of the Supplemental Traffic Analysis. (Coalition June 20, 2018 Letter pp. 4-5, Coalition July 6, 2018 Letter p. 5.) Contrary to the Coalition's argument, as detailed in the Overland Response the distribution in the Supplemental Traffic Analysis was conservative. While the Supplemental Traffic Analysis fully addressed the Coalition's comment regarding potential impacts at Sunset Boulevard and Vine Street and its conclusions are correct, the Overland Response explains that the Supplemental Traffic Analysis (and the Traffic Study in the Draft Supplemental EIR) were prepared based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition. The ITE Trip Generation Manual has been updated to the 10th Edition Manual, which was published in September 2017. Given that use of the 10th Edition Manual is current best practices, the Overland Response included an additional analysis to update the Modified Project's trip generation assumptions to reflect the trip generation provided in the 10th Edition Manual. This analysis demonstrates that under current best practices, the Sunset Boulevard and Vine Street intersection would not be significantly impacted by Modified Project traffic and the less than significant impact with mitigation identified in the Supplemental Traffic Analysis would be further reduced. Accordingly, use of the 10th Edition Manual shows that the potential for an impact at the Sunset Boulevard and Vine Street intersection is even lower than what was set forth in the Supplemental Traffic Analysis. This demonstrates the conservative nature of the Supplemental Traffic Analysis' assessment and conclusions regarding this intersection, and

further confirms the conclusion that the Sunset Boulevard and Vine Street intersection would not be significantly and unavoidably impacted.

The Modified Project's trip generation using the 10th Edition Manual is presented in Table 2 of the Overland Response and demonstrates that by utilizing the 10th Edition Manual's trip generation rates, the Modified Project would result in 1,221 fewer daily trips, 101 fewer AM Peak Hour trips, and 128 fewer PM Peak Hour trips than was previously assumed based on the trip generation rates in the 9th Edition Manual. Therefore, the more current 10th Edition Manual demonstrates that the impacts of the Modified Project are overestimated in the Modified Project's Traffic Study and Supplemental Traffic Analysis. Using the 10th Edition Manual, all of the study intersections would have less traffic from the Modified Project than was anticipated using the 9th Edition Manual. Specifically, for Sunset Boulevard and Vine Street, utilizing the same distribution assumptions as those from the Supplemental Traffic Analysis (but updating trip generation to the 10th Edition Manual), the intersection of Sunset Boulevard and Vine Street would have a less than significant impact without mitigation. Accordingly, under the 10th Edition Manual, implementation of MM K.1.3, which provides for a robust Transportation Demand Management (TDM) Plan, would no longer be required to mitigate a potentially significant impact.

In addition, by using the 10th Edition Manual, the Supplemental Traffic Analysis' conservative assumption that 2% of the Modified Project's trips would occur north on Vine Street could increase to 10% of the Modified Project's trips during the peak hour without significantly impacting the intersection of Vine Street and Sunset Boulevard. Consequently, the Modified Project could cause an additional seven vehicle trips to go through the southbound left turn at the intersection without resulting in a significant impact and without the need for mitigation. As detailed in the Overland Response and the Supplemental Traffic Analysis, it is unreasonable to assume that 10% of the Modified Project's trips would occur on Vine Street north of Sunset Boulevard. Nevertheless, this analysis was included in the Overland Response to demonstrate that by utilizing the 10th Edition Manual, which is current best practice in transportation impact analyses, a substantial increase in traffic could occur at the Vine Street and Sunset Boulevard intersection associated with the Modified Project without resulting in a potentially significant traffic impact.

Therefore, contrary to the Coalition's assertions, the Modified Project would have a less than significant impact at Sunset Boulevard and Vine Street even under an unreasonable assumption where the amount of Modified Project-related traffic going through that intersection is substantially increased.

3. Vehicles Queuing in the Modified Project Would Not Result in a Significant Impact to Gordon Street

Citing to the RK Analysis, the Coalition claims that the Supplemental EIR underestimates the length of vehicle queues likely to form from vehicles attempting to enter the Project Site. (Coalition June 20, 2018 Letter p. 5, Coalition July 6, 2018 Letter p. 5.) As explained in the Overland Response, queuing from the Modified Project would not result in a significant impact to Gordon Street.

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The Supplemental Traffic Analysis included a queuing analysis for the Modified Project and concluded that there is adequate on-site queue space under conservative estimates and the vehicle queue would not extend beyond the boundaries of the Modified Project site such that it would have the potential to affect vehicles traveling on Gordon Street. As provided in the Supplemental Traffic Analysis, the combined maximum queue of seven vehicles during the AM Peak Hour (comprised of one vehicle associated with residential uses and six vehicles associated with the commercial uses) and combined maximum of six vehicles during the PM Peak Hour (comprised of two vehicles associated with residential uses and four vehicles associated with the commercial uses) can be accommodated within the Modified Project's parking garage which provides space for eleven vehicles to queue prior to entry through the access gates.

The RK Analysis argues without support that in accessing the residential portion of the garage, "vehicles will creep up towards the gate itself and block circulation leaving the project" and will "result in conflicts with . . parking spaces that will need to back into the main circulation aisle." (Coalition June 20, 2018 Letter p. 5, Coalition July 6, 2018 Letter p. 5, RK Analysis p. 3.) This argument is focused on potential delays that could occur within the parking structure, and not queues that could extend outside the parking structure and affect a public street. The Modified Project's queuing analysis was conducted consistent with CEQA requirements to evaluate whether queuing would have the potential to affect vehicles traveling on the public street of Gordon Street. The L.A. CEQA Thresholds Guide (2006) does not require that a proposed project evaluate parking conditions on-site, but instead requires evaluation of a project's parking access and circulation to vehicular traffic on the existing traffic system. (See CEQA Thresholds Guide (2006), L.5 Project Access.)

Therefore, the comments raised by the RK Analysis regarding potential temporary conflicts that could arise in the internal workings of the garage are not properly evaluated as part of a queuing analysis because these conflicts would not have an impact on drivers traveling north or south on Gordon Street. Further, any internal conflicts within a parking garage are typical as vehicles enter and exit parking spaces. The RK Analysis also states that there is no left turn pocket to make a U-turn out of the site in the event that a vehicle erroneously enters the building. However, like most garages in the City of Los Angeles, if a vehicle enters the garage accidentally and wants to exit immediately, the vehicle will likely need to enter the parking area in order to exit. This is not an unusual circumstance for a parking garage, as garages are not designed for accidental entry. Regardless, were a vehicle to accidently enter the garage and need to turn around within the garage, this would not result in a potential affect to vehicles traveling north or south on Gordon Street.

The RK Analysis also asks how guests will enter the residential gated area. (Coalition June 20, 2018 Letter p. 5, Coalition July 6, 2018 Letter p. 5, RK Analysis p. 3.) As explained in the Supplemental Traffic Analysis, residents will have an entry card/fob sensor to quickly activate the entry gates. Accordingly, some guests who will be using resident parking spaces would access the residential parking area with a tenant's entry card or fob sensor. Other guests of the Project Site may choose to park in the commercial parking area in which case they will access the parking area with a ticket. The LAMC does not require specific guest parking spaces for the Modified Project under Parking Option 1. Were a residential guest to park in the residential area their access time is anticipated to be similar to a residents because they would

have the tenant's entry card or fob sensor, and therefore the access time was estimated at a conservative 13 seconds. Were a guest to utilize the commercial parking area a conservative 40-second service rate was assumed. Accordingly, the queuing analysis accounted for conservative service rates, and guest queuing would not be longer than estimated. Therefore, contrary to the Coalition's assertion no impact to Gordon Street would occur for vehicles queuing at the Modified Project.

4. Recirculation of the Supplemental EIR is not Required Because There is No Significant New Information in the Final Supplemental EIR

The Coalition asserts that the Draft Supplemental EIR should be recirculated because the Final Supplemental EIR adopted as a mitigation measure a transportation demand management plan to mitigate transportation impacts. (Coalition June 20, 2018 Letter p. 5, Coalition July 6, 2018 Letter p. 5.) The Coalition misstates the CEQA requirement for recirculation. The Final Supplemental EIR's new transportation mitigation measure does not constitute "significant new information" warranting recirculation.

CEQA requires recirculation when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review." (CEQA Guidelines Section 15088.5.) CEQA Guidelines Section 15088.5 explains that "significant new information" requiring recirculation includes:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The Final Supplemental EIR: disclosed no new significant environmental impacts from the Modified Project that could not be mitigated; did not result in a substantial increase in the severity of an environmental impact; included no new alternative or mitigation measure that would lessen impacts that was declined to be adopted; and was not inadequate and conclusory such that meaningful public review and comment were precluded. Therefore, no recirculation is required.

CEQA case law regarding recirculation further supports that no recirculation of the Supplemental EIR is required. As stated in *Laurel Heights v. Regents of University of California*, "the Legislature did not intend to promote endless rounds of revision and recirculation of EIR's. Recirculation was intended to be an exception, rather than the general

rule." (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1132.) Specifically, "[r]ecirculation ... is required when it reveals, for example, a new substantial impact or a substantially increased impact on the environment." (Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 447 [citation omitted].) "New information to an EIR after the close of the public comment period is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. [Citation.]" (Laurel Heights (1993) 6 Cal.4th 1112, 1129.) In fact "even a substantial increase in the severity of an environmental impact does not require recirculation of an EIR, or the preparation of an SEIR if mitigation measures are adopted which reduce the impact to a level of insignificance." (River Valley Preservation Project v. Metropolitan Transit Development Board (1995) 37 Cal. App. 4th 154, 168 (internal citations omitted).) The Final Supplemental EIR included no new significant information requiring recirculation. Identifying an impact that would be reduced to a less than significant level with feasible mitigation, such as the Modified Project's transportation demand management plan, is not new significant information requiring recirculation. Therefore, recirculation of the Supplemental EIR is not required.

B. The Supplemental EIR Adequately Analyzes the Modified Project's Impact on Housing and Population.

The Coalition asserts that the Supplemental EIR fails to analyze or mitigate impacts on housing and population. (Coalition June 20, 2018 Letter pp. 45-6, Coalition July 6, 2018 Letter pp. 6.) The Coalition's comment regarding housing and population is the exact same comment that AHF submitted in response to the Draft Supplemental EIR. Accordingly, the comment was fully addressed in the Final Supplemental EIR at Response to Comments 5A.33 and Response to Comment 5A.34 in Section III.B Responses to Comment Letters at pages III.B-79 - 82. However, the Coalition's comment entirely ignores that a response to this was provided in the Final Supplemental EIR.

As explained in the Final Supplemental EIR, the Modified Project's potential impacts with respect to housing and population were fully analyzed in Section IV.G, Population, Housing & Employment, of the Draft Supplemental EIR. The Coalition argues that allocating 5 percent of the Modified Project's units to affordable housing does not adequately mitigate the Modified Project's impacts on displacement of residents in the City. (Coalition June 20, 2018 Letter pp. 5-6, Coalition July 6, 2018 Letter p. 6.) However, the Supplemental EIR determined that the Modified Project would have no impact with respect to housing and population displacement. The analysis of displacement was fully addressed in the Certified EIR, which determined that the CRA Approved Project would not result in a significant impact with regard to population or housing displacement, as replacement housing for the nine dwelling units that existed on the Project Site would be provided by the new housing units that would be developed on the Project Site. The Modified Project does not change the Certified EIR's conclusion since the Modified Project would continue to provide replacement housing units that would exceed the nine dwelling units that previously existed on the site. Further, as an additional benefit, the Modified Project includes 15 affordable housing units that were not proposed under the CRA Approved

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Project analyzed in the Certified EIR, which exceeds the nine older dwelling units that previously existed on the Project Site. Therefore, while no change would occur from the CRA Approved Project regarding displacement of people or housing and no impact would occur, the Modified Project enhances the mix of housing provided by including 15 new affordable housing units. Accordingly, contrary to the Coalition's claim that the Supplemental EIR fails to mitigate its impacts on housing and population there is no mitigation necessary for the Modified Project because it would not result in an impact to displacement of people or housing under CEQA.

The Coalition further claims that urban revitalization, such as new housing, can have negative impacts on low-income residents of a neighborhood. (Coalition June 20, 2018 Letter p. 6, Coalition July 6, 2018 Letter p. 6.) Such an effect, related to economic or social change issues, are not effects considered by CEQA. CEQA Guidelines Section 15064(e) provides that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." (See also CEQA Guidelines Section 15382; see e.g. *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677.) The Coalition's opinion regarding urban revitalization does not implicate any physical condition of the environment. Further, there are no thresholds of significance identified in City of L.A. CEQA Thresholds Guide (2006) or Appendix G of the CEQA Guidelines related to urban revitalization. Therefore, no CEQA impact with regard to urban revitalization would occur.

The Coalition also claims, citing to the Regional Housing Needs Assessment (RHNA), that the Supplemental EIR does not address the mismatch between the mix of housing provided in the Modified Project and the housing needs within the City. Local communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth.⁶ The City does not have a process for allocating the citywide total among City subareas or Community Plan areas.

Nevertheless, the Modified Project's provision of affordable housing is consistent with the goals and policies set forth in the City's RHNA and the Modified Project would increase the amount of affordable housing available on the Project Site above what currently exists. The CRA Approved Project proposed the development of 311 multi-family residences whereas the Modified Project proposes to modify the CRA Approved Project to allow for the development of 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "very low" income level (5% of total units). Accordingly, the Modified Project proposes to increase the affordable housing stock on the Project Site by 15 affordable housing units, which would not otherwise be provided on the Project Site under the CRA Approved Project. Therefore, the Modified Project is consistent with the RHNA and reflects an improvement as compared to the CRA Approved Project that provided no affordable housing.

Finally, the Coalition erroneously claims that the Supplemental EIR was not an appropriate CEQA document for the Modified Project. (Coalition June 20, 2018 Letter p. 6, Coalition July 6, 2018 Letter p. 6.) The Coalition claims that the Supplemental EIR "tiers its

SCAG, RHNA & Housing, website: http://www.scag.ca.gov/programs/Pages/Housing.aspx, accessed April 2018.

analysis from the . . . 2007 EIR . . . even though rapid economic growth and accompanying population boom in the City of Los Angeles has significantly modified the situation." (Coalition June 20, 2018 Letter p. 6, Coalition July 6, 2018 Letter p. 6.) Contrary to the suggestion in the Coalition's statement, the Supplemental EIR evaluates: 1) changes between the CRA Approved Project and the Modified Project; 2) changes with respect to the circumstances under which the CRA Approved Project and the Modified Project are being undertaken, and 3) any new information, which was not known and could not have been known at the time of the Certified EIR for the CRA Approved Project. (See CEQA Guidelines Section 15162.) Accordingly, the Supplemental EIR updated the analysis in the Certified EIR as necessary to account for changes between the CRA Approved Project and the Modified Project, including changes that have occurred since the Certified EIR was certified. Therefore, the Supplemental EIR analysis accounted for applicable changes to population and housing since the Certified EIR.

Therefore, for the reasons stated above, the Supplemental EIR analyzes the Modified Project's impact on population and housing in compliance with CEQA and the CEQA Guidelines.

C. The Supplemental EIR Adequately Describes the Modified Project

The Coalition asserts that the Supplemental EIR fails to provide a Project Description that complies with CEQA because: 1) in listing the Modified Project's proposed entitlements, the Project Description states that the entitlements "include, but may not be limited to" and 2) the Project Description does not include a full environmental analysis of the parking alternative that is described in the Project Description. (Coalition June 20, 2018 Letter pp. 6-7, Coalition July 6, 2018 Letter pp. 6-7.) Again, the Coalition's erroneous claims are identical to what AHF submitted in response to the Draft Supplemental EIR. Accordingly, while the Coalition provides no mention of the previous response, these claims were fully addressed in the Final Supplemental EIR at Response to Comments 5A.5 in Section III.B Responses to Comment Letters at pages III.B-35 - 39.

Regarding the Coalition's first claim, as explained in further detail in the Final Supplemental EIR, the Draft Supplemental EIR provides a list of the potential permits and approvals that could be required to entitle the Modified Project in compliance with CEQA. CEQA Guidelines Section 15124 requires that "to the extent that the information is known to the lead agency . . . [a] list of permits and other approvals required to implement the project" should be included in the Project Description. All of the potential permits and approvals for the Modified Project are identified on pages II-41 through II-42 in Section II, Project Description, of the Draft Supplemental EIR. This list includes all potential permits and other approvals known to the lead agency at the time the Draft Supplemental EIR was published. The Supplemental EIR is an informational document and informs the decision makers of the potential approvals that could be required; the ultimate approvals are subject to the discretion of the decision makers. The inclusion of language "would include, but may not be limited to" in the Draft Supplemental EIR's Project Description acknowledges this fact but does not render the Project Description unstable, incomplete or inaccurate.

Further, contrary to the Coalition's second claim, the Supplemental EIR did include a full environmental analysis for the Modified Project's parking alternative. The analysis concludes that the alternative's impacts would be identical to those of the Modified Project. As explained on page II-4 of Section II. Project Description of the Draft Supplemental EIR, as an alternative related to parking, the applicant may seek approval of an ordinance that would reduce the clear space required at structural elements in the Modified Project's parking structure and allow up to 66% of the Modified Project's parking stalls to be compact parking stalls in order to increase the available on-site parking supply to benefit the surrounding community in this area of Hollywood. Under this alternative, the Modified Project would provide approximately 508 parking spaces within the Modified Project's parking structure, which would have three levels below grade, three levels above-grade parking, and a new automated steel parking structure with two floors of automated parking.

The proposal to include 508 parking spaces as part of the Modified Project is consistent with the CRA Approved Project analyzed in the Certified EIR, which proposed 508 parking spaces. The Certified EIR, which was certified by the lead agency on October 18, 2007, is no longer subject to challenge. Because the parking alternative would provide the same number of parking spaces that were analyzed in the Certified EIR, the Modified Project would not result in any new significant environmental impacts or increase the severity of previously identified significant impacts related to providing 508 parking spaces.

In addition, the Draft Supplemental EIR includes a complete analysis of the parking alternative at page IV.K.1-35 in Section IV.K.1, Traffic/Transportation, which explains that the alternative would not encourage additional vehicle trips to the Project Site. As discussed in Section IV.K.1, Traffic/Transportation, as required by LADOT, the trip generation for the Modified Project is based on the proposed mix of uses (residential, office, restaurant, retail, and coffee shop) and not the supply of parking. Providing additional parking spaces for those uses would not modify the proposed mix of uses or demand for those uses. Therefore, the additional parking spaces would not modify the vehicle trip assumptions for the Modified Project. Further, of the 80 additional parking spaces that would be provided under the alternative, approximately 63 of them would be tandem parking spaces within the residential portion of the parking garage. These additional tandem parking spaces would provide additional on-site parking for certain residential units but would not encourage additional vehicle trips to the Project Site because the number of residential units would remain the same and multi-family residential trip generation is based on unit count. Further, these additional parking spaces would only be replacing parking reductions that are permitted for the Modified Project by providing affordable housing and bicycle parking as discussed further in Section IV.H Land Use Planning and Section IV.K.2 Parking of the Draft Supplemental EIR. Without application of those parking reductions, which are allowed by applicable zoning regulations, the code parking requirement for the Modified Project would be 603 parking spaces. Thus, the proposed alternative to provide 508 parking spaces does not modify any of the analysis provided in Section IV.K.1, Traffic/Transportation of the Draft Supplemental EIR.

Because the addition of parking spaces does not modify the vehicle trip assumptions for the Modified Project it similarly does not impact the Modified Project's greenhouse gas analysis. The operational assumptions for the Modified Project's greenhouse gas emissions analysis were

provided on pages IV.D-28 through IV.D-29 in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. As discussed therein, the motor vehicle emission calculations associated with the operation of the Modified Project were based on a projection of annual VMT, which was derived from the trips provided in the Modified Project's Traffic Study. As discussed above, the trip generation for the Modified Project in the Modified Project's Traffic Study was based on the proposed mix of uses and not the parking supply. Thus, the proposed parking alternative does not encourage additional vehicle trips or modify the trip generation that the Modified Project's greenhouse gas emissions analysis utilized to calculate motor vehicle emission during operation. Therefore, the proposed alternative to provide additional parking spaces does not modify any of the analysis provided in Section IV.D, Greenhouse Gas Emissions of the Draft Supplemental EIR.

Accordingly, because the proposed alternative to provide additional parking spaces does not modify any of the analysis provided in Draft Supplemental EIR Section IV.K.1, Traffic/Transportation or Section IV.D, Greenhouse Gas Emissions, no additional traffic or greenhouse gas emissions analysis is warranted. Similarly, the proposed alternative to provide additional parking spaces does not impact or modify any of the Draft Supplemental EIR's analysis in the other environmental issue areas. Because there is no difference in the environmental analysis between the Modified Project and the Modified Project with the proposed parking alternative, there is no environmentally superior alternative between the two and contrary to the Coalition's statement, no environmentally superior alternative needs to be selected.

In addition, the Draft Supplemental EIR's alternatives analysis did identify an environmentally superior alternative for the Modified Project. As discussed in Section VI, Alternatives to the Modified Project, the Draft Supplemental EIR included an analysis of an alternative that did not include the construction of the automated steel parking structure, the No Automated Steel Parking Structure Alternative. The No Automated Steel Parking Structure Alternative was identified as the environmentally superior alternative because the No Automated Steel Parking Structure Alternative does not involve the construction of the automated steel parking structure and thus would slightly reduce the intensity of the significant and unavoidable noise impact as compared to the Modified Project because less exterior construction activities would be involved. Therefore, consistent with Section 15126.6 of the State CEQA Guidelines the Draft Supplemental EIR included an analysis of an environmentally superior alternative.

In addition, pursuant to SB 743 and the provisions set forth by CEQA Section 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's parking impacts shall not be considered significant impacts on the environment and no analysis of parking impacts is required. Nevertheless, a parking analysis, was provided in the Draft Supplemental EIR for informational purposes and confirmed that impacts associated with the proposal to provide 508 parking spaces in the Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

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Therefore, for the reasons stated above the Supplemental EIR's Project Description adequately describes the Modified Project in compliance with CEQA and the CEQA Guidelines.

D. The Supplemental EIR Does Not Adopt Unduly Narrow Project Objectives

The Coalition asserts the Modified Project's objectives stated in the Supplemental EIR are unduly narrow regarding the provision of 5% affordable housing units. (Coalition June 20, 2018 Letter p. 7, Coalition July 6, 2018 Letter p. 7.) Again, the Coalition's argument is identical to the one submitted by AHF in response to the Draft Supplemental EIR. Accordingly, the comment was fully addressed in the Final Supplemental EIR at Response to Comment 5A.6 in Section III.B Responses to Comment Letters at pages III.B-39 - 41. However, the Coalition entirely ignores that a response to this comment was included in the Final Supplemental EIR.

Section 15124 of the State CEQA Guidelines sets forth the required elements of an EIR's project description including the requirements for the statement of the objectives, which provides:

(b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

As discussed on page II-10 in Section II, Project Description, of the Draft Supplemental EIR, the underlying purpose of the Modified Project is to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles. In order to further this underlying purpose, five basic objectives and 10 additional objectives were identified for the Modified Project, including "To promote affordable housing by including 5 percent affordable housing units at the "Very Low" income level".

In accordance with CEQA, the Modified Project objectives include specific goals that would enable the Modified Project to achieve its underlying purpose. The primary purpose of the project objectives is to help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary (CEQA Guidelines Section 15124(b)). As such, the Modified Project objectives were appropriately stated in Section II, Project Description, of the Draft Supplemental EIR, in accordance with CEQA Guidelines Section 15124(b). The objective to promote affordable housing would further the Modified Project's underlying purpose of meeting the demand for mid- to high-rise residential living in the Hollywood area of the City of Los Angeles and provides a clear written statement to help the City of Los Angeles Department of City Planning, as the lead agency, to develop a reasonable range of alternatives to evaluate in the EIR and aid the decision makers in preparing findings.

Significantly, the objective to promote affordable housing was added to the Modified Project to acknowledge the City's need for affordable housing. The CRA Approved Project

analyzed in the Certified EIR did not include an affordable housing component. The addition of the objective to promote affordable housing for the Modified Project helps to ensure that affordable housing will be provided on the Project Site where it would not otherwise have been located.

"CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives" (California Oak Foundation v. Regents of University of California, 188 Cal.App.4th 227, 276-277 (2010)). "CEQA simply requires the agency to thereafter prepare and certify a legally adequate EIR that provides the agency and the public alike with detailed information regarding the proposed project's significant environmental impacts, as well as reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen [those impacts]" (Id. (internal citations omitted); see also CEQA Guidelines, Section 15126.6, subd. (a); In re Bay-Delta etc., 43 Cal. 4th 1143, 1166 (2008)). As explained in In re Bay-Delta etc., 43 Cal. 4th 1143, 1166 (2008), "[a]lthough a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal." The case cited by the Coalition, North Coast Rivers Alliance v Kawamura (2015) 243 Cal. App. 4th 647, 668, cites to In re Bay-Delta etc. for this very same proposition.

In compliance with *In re Bay-Delta etc.* and *North Coast Rivers Alliance* the Supplemental EIR established the underlying purpose of the Modified Project: "to meet the demand for mid- to high-rise residential living and provide neighborhood-serving retail uses and additional office space in the Hollywood area of the City of Los Angeles." (Draft Supplemental EIR, Section II. Project Description, page II-10.). The Supplemental EIR structured the alternatives analysis around this underlying purpose. Thus, the Modified Project's objectives and underlying purpose are consistent with Section 15124 of the State CEQA Guidelines.

In addition, the Modified Project would have a less than significant impact to population, housing, and employment. Therefore, changing the affordable housing percentage provided by the Modified Project would not change the conclusions in the Supplemental EIR and did not constrain the alternatives analysis provided in Section VI. Alternatives to the Modified Project.

Therefore, for the reasons stated above the Supplemental EIR's Project Objectives are in compliance with CEOA and the CEQA Guidelines.

E. The Supplemental EIR Analyzes the Environmental Impacts of the Clear Space Reduction Ordinance (known as the "Modified Project's Parking Alternative")

The Coalition asserts that the Supplemental EIR fails to include a full environmental analysis of the Modified Project's parking alternative (referred to by the Coalition as the Clear Space Reduction Ordinance). (Coalition June 20, 2018 Letter pp. 7-8, Coalition July 6, 2018 Letter pp. 7-8.) Again, the Coalition's erroneous comment is the same comment that AHF submitted in response to the Draft Supplemental EIR. Accordingly, the comment was fully addressed in the Final Supplemental EIR at Response to Comment 5A.7 in Section III.B

Responses to Comment Letters at pages III.B-41. The Coalition does not address that a complete response to this comment was included in the Final Supplemental EIR. This comment is also repetitive of the Coalition's comment that was addressed in Section II(C) above, which explains that the Supplemental EIR included a thorough analysis of the parking alternative including the potential transportation, parking, and other environmental impacts of providing 508 parking spaces as part of the Modified Project.

Therefore, for the reasons stated above, the Supplemental EIR's analysis of the Modified Project's parking alternative complies with CEQA and the CEQA Guidelines.

F. The Supplemental EIR is Not Impermissibly Vague and Does Not Defer Critical Details of Mitigation Measures

The Coalition asserts that the Supplemental EIR is impermissibly vague and defers mitigation measures. (Coalition June 20, 2018 Letter pp. 8-9, Coalition July 6, 2018 Letter pp. 8-9.) Like the Coalition's other Supplemental EIR comments, this is the same comment that AHF submitted in response to the Draft Supplemental EIR. A thorough response to this comment was included in the Final Supplemental EIR at Responses to Comments 5A.9 to 5A.19 in Section III.B Responses to Comment Letters at pages III.B-42 - 56. The Coalition's comment entirely ignores that a response to this was provided in the Final Supplemental EIR. In fact, in total, the Final Supplemental EIR included 14 pages providing a robust response to this exact same comment. As provided in significantly more detail in the Final Supplemental EIR, the Supplemental EIR is not impermissibly vague and does not defer critical details of mitigation measures because the mitigation measures either do not defer the formulation of mitigation measures or include specific performance standards associated with their implementation as allowed by CEQA.

The Coalition's argument includes an incomplete quote of State CEQA Guidelines Section 15126.4(a)(1)(B). State CEQA Guidelines Section 15126.4(a)(1)(B) goes on to explain that the formulation of mitigation measures after adoption is allowed when the included mitigation measures "specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1447 (holding that "the fact the entire extent and precise detail of the mitigation that may be required is not known does not undermine the final EIR's conclusion that the impact can in fact be successfully mitigated" when there is "nothing in the record which suggests that the impact cannot be mitigated in the manner described in the final EIR.").) Accordingly, because the Modified Project's mitigation measures include performance standards, the Supplemental EIR was prepared in accordance with CEQA and the CEQA Guidelines.

Further, all of the mitigation measures the Coalition complains about are mitigation measures that were originally approved by the CRA in connection with its certification of the Certified EIR. As explained in Section I. Introduction / Executive Summary at pages I-14 – I-15 of the Draft Supplemental EIR, the Modified Project contained two sets of mitigation measures: (1) Certified EIR Mitigation Measures, which are mitigation measures that the Modified Project would continue to implement that were included in the Certified EIR, and (2) MMs, which are

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mitigation measures the Modified Project would implement that were not included in the Certified EIR to account for any physical or regulatory changes to the circumstances under which the Modified Project is being undertaken. On October 18, 2007, the CRA adopted the Certified EIR and on December 14, 2007, the CRA subsequently adopted the mitigation monitoring and reporting program, which included the Certified EIR Mitigation Measures. The City also adopted the Certified EIR Mitigation Measures as part of its approval of the project. As such, the Certified EIR Mitigation Measures the Coalition references have already been adopted and are no longer subject to challenge.

Nevertheless, the Final Supplemental EIR addressed the Coalition's specific comments pertaining to the Certified EIR Mitigation Measures providing detail why each are sufficiently detailed and definite, and do not improperly defer mitigation. Furthermore, to clarify the requirements of certain Certified EIR Mitigation Measures, mitigation measures MM F-1.6 and MM J.1-1.1 and regulatory compliance measures CM H-1 and CM H-2 were added to the Modified Project to ensure that requirements of the Certified EIR Mitigation Measures are achieved.

Each mitigation measure mentioned by the Coalition is addressed in detail in the Final Supplemental EIR, which the Coalition's comment completely ignores. Despite the fact that each mitigation measure the Coalition raises has been fully responded to as required by CEQA, included below is a summary of the response and explanation of how each mitigation measure complies with CEQA and the CEQA Guidelines.

1. <u>Certified EIR Mitigation Measure MM. F-1.2</u>

Certified EIR Mitigation Measure MM F-1.2 provides:

Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen such activities from these land uses to the maximum extent possible.

Certified EIR Mitigation Measure MM F-1.2 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and is not vague and unenforceable. Certified EIR Mitigation Measure MM F-1.2 specifies exactly which activities shall be conducted away from noise sensitive uses, and specifies how barriers on the site like construction trailers can be used to reduce noise impacts. Accordingly, there is no ambiguity about those activities to which it applies.

Nevertheless, to further clarify the Modified Project's noise mitigation measures, MM F-1.6 was incorporated into Section II, Additions and Corrections Section of the Final Supplemental EIR. MM F-1.6 provides for the development of a Construction Noise Mitigation Plan that will reduce noise impacts by at least 10 dBA through implementation of construction noise reduction measures. Implementation of mitigation measure MM F-1.6 would reduce

construction noise similar to the noise mitigation measures from the Draft Supplemental EIR; however, MM F-1.6 provides additional clarity about how construction noise reduction would be accomplished.

2. Certified EIR Mitigation Measure MM. F-1.3

Certified EIR Mitigation Measure MM F-1.3 provides:

To the maximum extent feasible, the use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized.

Certified EIR Mitigation Measure MM F-1.3 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and is not vague and unenforceable. Analysis of the peak construction noise activities was provided in the Draft Supplemental EIR and would be generated during the excavation, grading stage and the finishing stage of construction. The peak exterior noise levels for the Modified Project are the same as those identified in the Certified EIR for the CRA Approved Project. Accordingly, there is no ambiguity about the peak noise construction activities.

Nevertheless, mitigation measure MM F-1.6, was incorporated into Section II, Additions and Corrections Section of the Final Supplemental EIR. MM F-1.6 provides for the development of a Construction Noise Mitigation Plan that will reduce noise impacts by at least 10 dBA through implementation of construction noise reduction measures. Implementation of mitigation measure MM F-1.6 would reduce construction noise similar to the noise mitigation measures from the Draft Supplemental EIR; however, MM F-1.6 provides additional clarity about how construction noise reduction would be accomplished.

3. Certified EIR Mitigation Measure MM IV.H-7

Certified EIR Mitigation Measure MM IV.H-7 provides:

The Applicant shall procure all necessary entitlements and land use approvals from the City of Los Angeles Department of City Planning, including but not limited to the various discretionary actions as listed in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR.

The mitigation measure is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines because the Modified Project cannot be developed unless and until the necessary land use entitlements are procured from the City of Los Angeles. All potential, anticipated discretionary actions needed from the City of Los Angeles are listed in Section 3, Item B of Section IV.H. Land Use Planning in the Draft Supplemental EIR. Therefore, Certified EIR Mitigation Measure MM IV.H-7 is not vague, does not defer mitigation to a later date, and is enforceable.

4. <u>Certified EIR Mitigation Measure MM IV.H-4-1</u>

Certified EIR Mitigation Measure MM IV.H-4-1 provides:

The Applicant shall develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills.

Certified EIR Mitigation Measure MM IV.H-4-1 is provided to ensure that a construction and demolition debris recycling program be prepared. Certified EIR Mitigation Measure MM IV.H-4-1 does not improperly defer mitigation to a later date or fail to specify a performance standard. As discussed in Section IV, Mitigation Monitoring Program, of the Final Supplemental EIR, LADBS and the Bureau of Sanitation would enforce Certified EIR Mitigation Measure MM IV.H-4-1 to ensure that the development of a construction and demolition debris recycling program would divert construction related solid waste and demolition debris from area landfills with a field inspection required for sign-off. During their compliance review, LADBS and the Bureau of Sanitation would review for compliance with LAMC requirements, which include solid waste diversion goals (see LAMC Section 66.32 et seq.). Thus, Certified EIR Mitigation Measure MM IV.H-4-1 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and does not defer mitigation to a later date and is enforceable as a performance based mitigation measure.

In addition, since certification of the Certified EIR, the 2010 L.A. Green Code became effective on January 1, 2011. Per the 2010 L.A. Green Code, the Modified Project would implement a construction waste management plan to achieve the 2010 L.A. Green Code's requirement of 50 percent diversion from landfills. Accordingly, regulatory compliance measure CM H-1 was incorporated into Section II, Additions and Corrections Section of the Final Supplemental EIR, which provides for the implementation of a construction waste management plan to achieve the 2010 L.A. Green Code's requirement of 50 percent diversion from landfills.

Implementation of regulatory compliance measure CM H-1 would ensure the development and implementation of a construction waste management plan consistent with Certified EIR Mitigation Measure MM IV.H-4-1. Thus, the addition of regulatory compliance measure CM H-1 clarifies how Certified EIR Mitigation Measure MM IV.H-4-1's requirements would be accomplished.

5. Certified EIR Mitigation Measure MM IV.H-4-2

Certified EIR Mitigation Measure MM IV.H-4-2 provides:

The Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects.

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Certified EIR Mitigation Measure MM IV.H-4-2 does not improperly defer mitigation to a later date because the requirements of the recycling plan are clearly provided for in the text of the mitigation measure through its reference to Los Angeles Municipal Code requirements. Specifically, Certified EIR Mitigation Measure MM IV.H-4-2 would be consistent with Section 12.21-A,19 of the LAMC, which provides that all non-residential and high-rise residential projects provide areas for collecting and loading recyclable material. Additionally, as discussed in Section IV. Mitigation Monitoring Program, of the Final Supplemental EIR, compliance with Certified EIR Mitigation Measure MM IV.H-4-2 will be monitored by LADBS and the Bureau of Sanitation during pre-construction and construction activities with a field inspection required for sign-off. Therefore, Certified EIR Mitigation Measure MM IV.H-4-2 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines, does not defer mitigation to a later date and is enforceable.

Further, since certification of the Certified EIR, development of a recycling plan is required through compliance with regulations, including compliance with CALGreen waste reduction measures for the operation of the Modified Project as well as LAMC Section 12.21 A.19. Accordingly, regulatory compliance measure CM H-2 was incorporated into Section II, Additions and Corrections of the Final Supplemental EIR which requires that the Modified Project comply with LAMC Section 12.21 A.19 and the CALGreen Code to ensure the 5929 Sunset develop an operational project recycling plan.

Implementation of regulatory compliance measure CM H-2 would ensure the development and implementation of an operational project recycling plan consistent with Certified EIR Mitigation Measure MM IV.H-4-2. Thus, the addition of regulatory compliance measure CM H-2 clarifies how Certified EIR Mitigation Measure MM IV.H-4-2's requirements would be accomplished.

6. Certified EIR Mitigation Measure MM IV.J.1-2.1

Certified EIR Mitigation Measure MM IV.J.1-2.1 provides:

In order to mitigate the potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Project shall, prior to construction, develop a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan should include temporary roadway striping and signage for traffic flow as necessary, as well the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project if necessary.

Certified EIR Mitigation Measure MM IV.J.1-2.1 is provided to ensure that a Construction Traffic Control/Management Plan be prepared in consultation with LADOT if any lane and/or sidewalk closures are necessary during the construction period. Certified EIR Mitigation Measure MM IV.J.1-2.1 does not improperly defer mitigation to a later date because the requirements of the Construction Traffic Control/Management Plan are clearly provided for

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in the mitigation measure. As discussed in Section IV, Mitigation Monitoring Program, of the Final Supplemental EIR, compliance with Certified EIR Mitigation Measure MM IV.J.1-2.1 will be monitored by LADOT during pre-construction and construction activities with a field inspection required for sign-off. Therefore, Certified EIR Mitigation Measure IV.J.1-2.1 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and does not defer mitigation to a later date and is enforceable.

Nevertheless, MM J.1-1.1 has been incorporated into Section II, Additions and Corrections Section of the Final Supplemental EIR. Implementation of mitigation measure MM J.1-1.1 would ensure that a Construction Traffic Control/Management Plan is prepared for the Modified Project consistent with Certified EIR Mitigation Measure MM IV.J.1-2.1. Thus, the addition of mitigation measure MM J.1-1.1 clarifies how Certified EIR Mitigation Measure MM IV.J.1-2.1's requirements would be accomplished.

7. <u>Certified EIR Mitigation Measure MM IV.J.1-3.2</u>

Certified EIR Mitigation Measure MM IV.J.1-3.2 provides:

The Applicant shall develop and implement a Security Plan in consultation with the LAPD, outlining the security services and features to be provided in conjunction with the Modified Project. The plan shall be coordinated with the LAPD and a copy of said plan shall be filed with the LAPD West Bureau Commanding Officer. Said security plan may include some or all of the following components:

- i. Provisions for on-site private security personnel for the commercial and residential areas. Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be provided. Security officers shall be responsible for patrolling all common areas including the back service corridors and alleys, parking garages, and stairwells. All security officers shall patrol the grounds primarily by foot; however, bike patrol may be implemented in the parking garages and on the surrounding roadways.
- ii. The parking garages shall be designed to cordon off residential and commercial serving parking areas to provide increased security for project residents of the Modified Project. Both residential and commercial parking areas shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that will provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

Certified EIR Mitigation Measure MM IV.J.1-3.2 is provided to ensure that a security plan be prepared in consultation with LAPD. Certified EIR Mitigation Measure MM IV.J.1-3.2 does not improperly defer mitigation to a later date because the requirements of the security plan are clearly provided for the Mitigation Measure. As discussed in Section IV, Mitigation Monitoring Program, of the Final Supplemental EIR, compliance with Certified EIR Mitigation

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Measure MM IV.J.1-3.2 will be monitored by LADBS and LAPD during pre-construction and construction activities with a field inspection required for sign-off. Thus, Certified EIR Mitigation Measure MM IV.J.1-3.2 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and does not defer mitigation to a later date.

8. Certified EIR Mitigation Measure MM IV.K.2-1

Certified EIR Mitigation Measure MM IV.K.2-1 provides:

In order to mitigate potential parking impacts from construction workers the Project shall, prior to commencing construction, develop a Construction Parking Plan requiring construction workers to park off-street and not use on-street parking spaces. The Project contractor shall develop a temporary off-street parking plan to ensure a sufficient supply of off-street spaces is provided for the construction workers.

Certified EIR Mitigation Measure IV.K.2-1 does not improperly defer mitigation to a later date because the requirements of the Construction Parking Plan are clearly provided for in the text of the Mitigation Measure. As discussed in Section IV, Mitigation Monitoring Program, of the Final Supplemental EIR, LADOT would monitor and ensure the project contractor complies with the Construction Parking Plan during construction of the Modified Project and LADOT would indicate compliance with Certified EIR Mitigation Measure MM IV.K.2-1 by approval of the Construction Parking Plan and field inspection sign-offs during the Modified Project's construction activities. Thus, Certified EIR Mitigation Measure MM IV.K.2-1 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines.

In addition, during the Modified Project's additional construction activities it is anticipated that all construction workers can park on-site in either the Modified Project's parking garage or the closed park site.

Furthermore, pursuant to SB 743 and the provisions set forth by CEQA Section 21099, the Modified Project is classified as a mixed-use residential project located on a project site that is considered an infill site within a Transit Priority Area as defined by CEQA. As such, the Modified Project's parking impacts shall not be considered significant impacts on the environment.

9. Certified EIR Mitigation Measure MM IV.D-5

Certified EIR Mitigation Measure MM IV.D-5 provides:

The Applicant shall prepare and submit an emergency response plan for approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. The emergency response plans shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

Certified EIR Mitigation Measure MM IV.D-5 is provided to ensure that an emergency response plan be prepared and submitted for review and approval by the City of Los Angeles Planning Department and the City of Los Angeles Fire Department. Certified EIR Mitigation Measure MM IV.D-5 does not improperly defer mitigation to a later date because the requirements of the emergency response plan are clearly provided for in the text of the Mitigation Measure. In addition, as discussed in Section IV, Mitigation Monitoring Program, of the Final Supplemental EIR, compliance with Certified EIR Mitigation Measure MM IV.D-5 will be monitored by LADBS and the City of Los Angeles Fire Department during preconstruction activities with a field inspection required for sign-off. Thus, Certified EIR Mitigation Measure MM IV.D-5 is consistent with Section 15126.4(a)(1)(B) of the State CEQA Guidelines and does not defer mitigation to a later date.

G. The Project Does Not Require a New Environmental Impact Report or a Subsequent Environmental Impact Report

The Coalition asserts a new EIR or a Subsequent EIR should have been prepared for the Modified Project instead of the Supplemental EIR. (Coalition June 20, 2018 Letter pp. 9-10, Coalition July 6, 2018 Letter p. 10.) Again, the Coalition's argument is substantially the same as the one submitted by AHF in response to the Draft Supplemental EIR. Accordingly, the comment was fully addressed in the Final Supplemental EIR at Response to Comment 5A.20 in Section III.B Responses to Comment Letters at pages III.B-57 - 62. As with other comments by the Coalition, the Coalition ignores that a response was provided in the Final Supplemental EIR.

As explained in further detail in the Final Supplemental EIR, contrary to the Coalition's claim, the Supplemental EIR prepared for the Modified Project is the appropriate CEQA document to analyze the Modified Project's potential effects on the environment. Consistent with CEQA and the CEQA Guidelines, the purpose of the Draft Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Modified Project, which involves limited changes to the CRA Approved Project analyzed in the Certified EIR, and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe. The Draft Supplemental EIR was prepared pursuant to CEQA Section 21166 and CEQA Guidelines Section 15163.

Based on the applicable statutory language, where an environmental impact report has been prepared for a project, and "substantial changes" are proposed that will "require major revisions of the environmental impact report," then either a subsequent or supplemental environmental impact report is required. (CEQA Section 21166.) A supplemental environmental impact report may be prepared where "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation." (CEQA Guidelines Section 15163.) Here 5929 Sunset is proposing limited modifications to the CRA Approved Project through the Modified Project and only minor additions or changes were necessary to make the Certified EIR adequate to apply to the Modified Project.

The Coalition cites to Save Our Neighborhood v. Lishman (2006) 140 Cal. App. 4th 1288, 1301 to support its claim that the Supplemental EIR is not the appropriate CEQA review document for the Modified Project. As an initial matter, the Save Our Neighborhood decision only addresses when a CEQA addendum is an appropriate CEQA document. (Id. at 1291.) The decision does not address when it is appropriate to prepare a subsequent or a supplemental EIR, and thus is not applicable to the facts involving the Modified Project where a supplemental EIR was prepared consistent with CEQA Section 21166 and CEQA Guidelines Section 15163.

In addition, the California Supreme Court strongly criticized a portion of the Save Our Neighborhood opinion where the court stated that "a threshold question is whether we are dealing with a change to a particular project or a new project altogether. Public Resources Code section 21166 ... [applies] to the former but not the latter." (See Friends of College of San Mateo Gardens v. San Mateo County Community College Dist. (2016) 1 Cal. 5th 937, which was also cited by the Coalition). Instead of the "new project" test introduced in Save Our Neighborhood, in Friends of College the Supreme Court confirmed that under CEQA the relevant inquiry is whether "there is a change in plans, circumstances, or available information after a project has received initial approval, the agency's environmental review obligations 'turn[] on the value of the new information to the still pending decisionmaking process.' (Marsh v. Oregon Natural Resources Council (1989) 490 U.S. 360, 374 [104 L. Ed. 2d 377, 109 S. Ct. 1851] (Marsh).) If the original environmental document retains some informational value despite the proposed changes, then the agency proceeds to decide under CEQA's subsequent review provisions whether project changes will require major revisions to the original environmental document because of the involvement of new, previously unconsidered significant environmental effects." (Friends of College of San Mateo Gardens v. San Mateo County Cmty. Coll. Dist. (2016) 1 Cal.5th 937, 951-52.) The court explained that this lead agency determination is entitled to deference stating that "[w]e expect occasions when a court finds no substantial evidence to support an agency's decision to proceed under CEQA's subsequent review provisions will be rare, and rightly so." (Id. at 953; See also Moss v. County of Humboldt (2008) 162 Cal.App.4th 1041, 1052.)

The Coalition states that due to changes in the plans, circumstances and available information concerning the Modified Project, the Certified EIR for the CRA Approved Project lacks informational value, requiring an entirely new environmental impact report based upon current environmental conditions presuming the non-existence of the currently illegal structure. (Coalition June 20, 2018 Letter p. 10, Coalition July 6, 2018 Letter p. 10.) The Coalition's claim is based purely on unsubstantiated opinion, and is not supported by any evidence. Further, and contrary to the Coalition's claims, the Certified EIR retains substantial informational value given that the overall changes between the CRA Approved Project and the Modified Project are minor. The CRA Approved Project analyzed in the Certified EIR proposed the demolition of existing uses on the Project Site and the development of an approximately 324,432 square-foot mixed use project including: 311 multi-family residences, approximately 53,500 square feet of commercial space, a 21,177 square-foot public park on the north side of the Project Site along Gordon Street, and two supergraphic signs. The project analyzed in the Certified EIR included a 23- story structure (260 feet high above grade) with an 18-floor residential tower above a five-level above-grade podium structure with three to four levels of subterranean parking.

The Modified Project is a substantively similar development, involving all of the same uses as the CRA Approved Project - and most of those uses are slightly smaller under the Modified Project. Specifically, the Modified Project analyzed in the Supplemental EIR proposes the development of an approximately 324,693 square-foot mixed use project including: 299 residential apartment units, including 284 market rate units and 15 affordable housing units at the "very low" income level (5% of total units), approximately 46,110 square feet of commercial space comprised of approximately 38,440 square feet of office space, approximately 3,700 square feet of ground floor restaurant space and approximately 3,970 square feet of ground floor community serving retail space (including up to a 1,475 square foot coffee shop), an approximately 18,962 square-foot public park, and one supergraphic sign.⁷ The Modified Project includes a 22-story structure (250 feet high above grade) with an 18-floor residential tower above a four-level above grade podium that would have three levels below grade and three levels above-grade parking and two floors of a new automated parking. Accordingly, the physical changes between the Modified Project and the CRA Approved Project are extremely minor, and thus the Certified EIR continues to provide informational value for the environmental analysis of the Modified Project.

In addition, as required by CEQA Section 21166, the analysis in the Draft Supplemental EIR evaluates: 1) changes between the CRA Approved and the Modified Project; 2) changes with respect to the circumstances under which the CRA Approved and the Modified Project are being undertaken; and 3) any new information, which was not known and could not have been known at the time of the Certified EIR for the CRA Approved Project. By providing these comparisons, the environmental analysis addresses each of the potential environmental effects of the Modified Project as compared to the CRA Approved Project and demonstrates that the Certified EIR retains informational value for the decision makers. Each environmental issue analyzed in the Supplemental EIR contains a discussion of existing conditions, an assessment and discussion of the significance of impacts associated with the CRA Approved Project and the Modified Project, mitigation measures, cumulative impacts, and level of impact significance after mitigation.

The Coalition asserts that an entirely new environmental impact report based upon current environmental conditions presuming the non-existence of the currently illegal structure is required. (Coalition June 20, 2018 Letter p. 10, Coalition July 6, 2018 Letter p. 10.) Contrary to this statement, the Draft Supplemental EIR was prepared in compliance with CEQA and the CEQA Guidelines and therefore describes the current environmental conditions but does not take credit for the existence of the building and public park. In compliance with CEQA Guidelines Section 15125, the Draft Supplemental EIR provides a description of the physical environmental conditions in the vicinity of the Project Site, as they exist at the time the notice of preparation was published. This discussion includes a description of existing and surrounding land uses and describes the moderate changes from the surrounding land uses described in the Certified EIR due to construction of other buildings and new related projects that have occurred since certification of the Certified EIR. In accordance with CEQA Guidelines Section 15125(a), to accurately provide a description of the physical environmental conditions in the vicinity of the

⁷ 5929 Sunset has withdrawn its request for the supergraphic sign. Accordingly, it is no longer proposed as part of the Modified Project.

Project Site, the Draft Supplemental EIR discusses the fact that a vacant mixed use building and public park currently occupy the Project Site. Moreover, the Draft Supplemental EIR's environmental analysis of the Modified Project does not take credit for the vacant 22-story, approximately 250-foot high mixed use building of approximately 319,562 square feet of floor area, and an approximately 18,962 square-foot public park on the Project Site. Accordingly, while the Draft Supplemental EIR updates the current environmental setting to account for the existing building and public park, the Draft Supplemental EIR includes a complete environmental analysis of the Modified Project, including an analysis of the construction of the existing building and public park.

The Coalition also states that the Certified EIR lacks information value since it has been more than 10 years since the certification of the Certified EIR. (Coalition June 20, 2018 Letter p. 10, Coalition July 6, 2018 Letter p. 10.) Length of time is not a controlling factor in determining whether a previously certified EIR maintains informational value. In *Mani Brothers Real Estate Group v. City of Los Angeles (2007) 153 Cal.App.4th 1385*, 15 years had lapsed between the certification of the EIR for the original project and the project modification and the court found the EIR had informational value. (See also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689] [eight years between certified FEIR and addendum].) Therefore, the inquiry is whether the Certified EIR retains information value and not the length of time since the certification of the EIR. As explained above, the Certified EIR maintains substantial informational value for the Modified Project's environmental analysis given that the overall physical changes between the CRA Approved Project and the Modified Project are extremely minor.

Finally, the comment states that previous approvals for the CRA Approved Project were based on preservation of the Old Spaghetti Factory façade and cites to an unpublished court opinion that addressed some of those approvals. (Coalition June 20, 2018 Letter p. 10, Coalition July 6, 2018 Letter p. 10.) Contrary to the comment's suggestion, the Modified Project's proposal for the Old Spaghetti Factory façade is consistent with the Certified EIR. The Certified EIR explained that the applicant was exploring options for the Old Spaghetti Factory building at 5939 Sunset Boulevard Building (herein after referred to as the "OSF Building") including a partial structural treatment plan to retain and incorporate a portion of the OSF Building as a prominent design element at the corner of Sunset Boulevard and Gordon Street or alternatively other methods that would not require retention and/or restoration but would memorialize the social significance of this building as it relates to the development of the Hollywood area. The Certified EIR explained that since none of the buildings located on the Project Site were deemed historically or culturally significant, demolition and/or remodel of these structures would not significantly impact any historic or cultural resource. The Modified Project would demolish the OSF Building and incorporate a replica of its façade in approximately the same position and dimensions of the demolished building. The Modified Project's replica of the building façade is consistent with the Certified EIR's description of the option to not retain and/or restore the building façade, but instead to memorialize the social significance of this building as it relates to the development of the Hollywood area. Accordingly, the comment's reference to the previous approvals have no bearing on the adequacy of the Supplemental EIR.

For the reasons stated above the Supplemental EIR is the appropriate environmental document for the Modified Project, accounts for changes in plans, circumstances and available information concerning the Modified Project, and prepared the environmental analysis in compliance with CEQA and the CEQA Guidelines.

H. The Project Will Not Have Significant Impact on Land Use

The Coalition claims that the Modified Project will have a significant impact on Land Use because the Modified Project requires entitlements including a General Plan Amendment and Vesting Zone and Height District Change. (Coalition June 20, 2018 Letter p. 10, Coalition July 6, 2018 Letter p. 10.) Because the Modified Project requires these entitlements, the Coalition claims with no basis or evidentiary support that the Modified Project is inconsistent with the City's General Plan and Hollywood Community Plan. Contrary to the unsupported statement, the Modified Project would not have a significant Land Use impact. As detailed in Section IV.H Land Use Planning of the Draft Supplemental EIR at pages IV.H-46-62, the Modified Project is consistent with local land use policies and regulations including the General Plan Framework Element and the Hollywood Community Plan. Therefore, the Modified Project would not have a significant Land Use impact and is in compliance with CEQA and the CEQA Guidelines.

III. THE MODIFIED PROJECT COMPLIES WITH THE CITY'S GENERAL PLAN, HOLLYWOOD SPECIFIC PLAN AND THE LAMC

A. The Modified Project's Proposed General Plan Amendment, Vesting Zone and Height District Change, and VTTM Comply With The Hollywood Community Plan

The Coalition incorrectly claims that the Modified Project is inconsistent with the Hollywood Community Plan. (Coalition June 20, 2018 Letter pp. 10-11, Coalition July 6, 2018 Letter pp. 10-11.) The Coalition's first claim related to the Hollywood Community Plan is that the Hollywood Community Plan bars increases in density without adequate transportation infrastructure. The Coalition's claim fails for a number of reasons. To begin, the Hollywood Community Plan states:

No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated. Adequate highway improvements shall be assured prior to the approval of zoning permitting intensification of land use in order to avoid congestion and assure proper development. (Hollywood Community Plan HO-4.)

Significantly, the Modified Project's proposed entitlements do not result in any increase in density on the Project Site. The existing zoning on the Project Site permits a floor area of 324,901 square feet and a residential density of 305 dwelling units. (See Ordinance 180,094, CPC-2007-GPA-ZC-HD-CU-CUB-ZV-ZAA-SPR-SPE-SPP, Council File 08-1509.) The Modified Project proposes a floor area of 324,693 square feet and 299 residential apartment

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units—less floor area and less residential density than what is currently permitted on the Project Site. Accordingly, there is no increase in density proposed as part of the Modified Project.

Nevertheless, even if the Modified Project were to result in an increase in density, the local streets, major and secondary highways, freeways, and public transportation available in the Project Site area are adequate to serve the traffic generated. As shown in the Supplemental EIR, the Modified Project would have a less than significant traffic and transportation impact with the incorporation of mitigation measures. Specifically, the Modified Project would implement improvements to the intersections of Gower Street and Sunset Boulevard and Bronson Avenue and Sunset Boulevard (MM K.1-1 and MM K.1-2) and would also implement a robust Transportation Demand Management (TDM) Plan (MM K.1-3). Therefore, with the incorporation of mitigation measures the Supplemental EIR concludes that the Modified Project would have a less than significant impact to traffic and transportation and the local streets, major and secondary highways, freeways, and public transportation available in the area of the Project Site are adequate to serve the traffic generated. Accordingly, the Modified Project complies with the Hollywood Community Plan.

In addition, the Coalition argues that the City must prepare station area master plans as described in the Hollywood Community Plan prior to permitting higher intensity development like the Modified Project. As explained above, the Modified Project proposes a slight reduction in density from what the existing zoning on the Project Site allows. Nevertheless, the Coalition's characterization of the Hollywood Community Plan incorrectly states that station area master plans are required. With respect to Metro Rail Station areas, the Hollywood Community Plan states "if development intensities greater than those depicted in this Plan are to be encouraged, station area master plans should be prepared." The Modified Project's density of 4.5:1 is consistent with the density depicted on the Hollywood Community Plan. Specifically, Footnote 9 of the Hollywood Community Plan General Plan Land Use Map, which corresponds with the Regional Center Commercial land use designation, provides:

This designation is limited to the Hollywood Redevelopment Project Area. Development intensity is limited to 4.5:1 FAR with a maximum of 6:1 FAR possible through a Transfer of Development Rights procedure and/or City Planning Commission approval.

The Project Site is located within the Hollywood Redevelopment Project area. Further, the proposed Modified Project will be consistent with this footnote, and will not exceed a FAR of 4.5:1.

For the reasons above, the Coalition claims that the Modified Project is inconsistent with the Hollywood Community Plan are incorrect and unsupported. Contrary to the Coalition's argument the Modified Project is in conformance with the goals, policies, and objectives of the Hollywood Community Plan.

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B. The Proposed General Plan Amendment Does Not Violate The City Charter

The Coalition claims that the Modified Project's requested General Plan Amendment violates the City Charter. (Coalition June 20, 2018 Letter p. 11, Coalition July 6, 2018 Letter p. 11.) This claim is wholly without merit. The City Charter provides that "[t]he General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity." (Charter Section 555(a); see also LAMC Section 11.5.6.) The Coalition states that the portion of the Project Site identified for a General Plan Amendment "is neither a geographic area of significant social, economic or physical identity." However, neither the Charter nor the LAMC include any prohibition on General Plan Amendments applicable to a single lot, parcel or project site. In fact, amendments to the City Charter made in 1999 provided greater flexibility to the City to determine the appropriate size of land area suitable for a General Plan Amendment. (The Los Angeles Old City Charter Section 96.5(3)(a) provided "The General Plan shall be so prepared that the City Planning Commission may approve and the Council may adopt it as follows: as a whole; by complete subject elements; by substantial geographical areas; or by portions of subject elements, provided that any such area or portion has significant social, economic or physical identity.") In addition, the Court of Appeal has held that a general plan may be amended to accommodate a specific zone change. (deBottari v. City Council (1985) 171 Cal.App.3d 1204.)

Accordingly, a General Plan Amendment for a portion of the Project Site is allowed by the City Charter. Further, the proposed General Plan Amendment to Regional Center Commercial for a portion of the Project Site is entirely consistent with Charter Section 555(a) because it proposes an amendment to a geographic area that has social, economic or physical identity. Specifically, the three parcels for which a General Plan Amendment is proposed contain the Modified Project's approximately 18,962-square-foot park. This park has social, economic and physical identity. Therefore, contrary to the Coalition's claim, the proposed General Plan Amendment does not violate the City's Charter.

C. The VTTM Complies with the Map Act

Contrary to the Coalition's claims, the Advisory Agency fully adhered to the requirements of the Map Act as implemented by the City of Los Angeles in its approval of the Modified Project's VTTM. Citing to California Government Code Section 66474 (a-b) The Coalition claims that the Map Act requires that a local agency deny approval of a land subdivision where it determines the "the proposed map is not consistent with applicable general and specific plans" or that "the design or improvements of the proposed subdivision is not consistent with applicable general and specific plans." (Coalition June 20, 2018 Letter p. 11, Coalition July 6, 2018 Letter p. 11.) To support this claim, citing to other portions of the Coalition's letter, the Coalition claims that the Modified Project is inconsistent with the General Plan and the Hollywood Community Plan. As provided in detail above, the Modified Project is consistent with the General Plan and the Hollywood Community Plan and satisfies all required findings. Further, the June 29, 2018, Advisory Agency determination for the VTTM satisfied all required Map Act findings at pages 244 – 252.

In addition, when evaluating the required findings for a VTTM, the Map Act requires that the proposed General Plan Amendment – not the existing designation – be applied to the Modified Project's VTTM. As the Map Act explains, where a local agency considers approval of a map application, "[i]f a subdivision applicant requests changes in the applicable ordinances, policies or standards in connection with the same development project, any ordinances policies or standards adopted pursuant to the applicant's request shall apply." (Map Act Section 66474.2(c) (emphasis added).) Pursuant to this provision, the Modified Project's VTTM approval must be analyzed against the Modified Project's proposed General Plan Amendment in determining consistency with the General Plan and Hollywood Community Plan. As part of VTTM Condition 20, the VTTM is conditioned upon approval of the General Plan Amendment and Vesting Zone and Height District Change for the Modified Project. Therefore, with an approval of the General Plan Amendment and Vesting Zone and Height District Change, the Modified Project would be consistent with the City's General Plan and Hollywood Community Plan consistent with the requirements of the Map Act.

D. A Conditional Use Permit to Allow the Sale of Alcoholic Beverages for On-Site Consumption at the Modified Project Does Not Violate LAMC Section 12.24.W.1

The Coalition claims that the City has failed to issue any of the required findings pursuant to LAMC 12.24.W.1 necessary for approval of a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the Modified Project's restaurant. (Coalition June 20, 2018 Letter pp. 11-12, Coalition July 6, 2018 Letter pp. 11-12.) At this time, the City has not issued a determination regarding 5929 Sunset's request for a Conditional Use Permit. The City held the Hearing Officer Hearing on June 20, 2018 for the Conditional Use Permit request but the initial decision maker for the Conditional Use Permit is the City Planning Commission, who will review the Modified Project on August 9, 2018. (See LAMC Section 12.36.C.1 regarding the initial decision maker for projects requiring multiple approvals.) Accordingly, it is premature for the Coalition to claim that the City has failed to issue the required findings since no determination on the Conditional Use Permit has been made.

Significantly, we note that 5929 Sunset's request for a Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the Modified Project's restaurant is similar to the previous use at the Project Site, which was a restaurant serving alcohol. The previous restaurant was located in the same area on the Project Site and provided a beneficial service for the community for approximately 30 years. During its time of operation, there was no record of any spillover effect of an adverse nature on the residential community as a result of the operation of the restaurant use serving alcohol.

Therefore, while it is premature for the City to make any findings regarding the Conditional Use Permit since no determination has been made, if the City chooses to approve the Conditional Use Permit the City will be able to support its determination including consistency with all required findings with substantial evidence.

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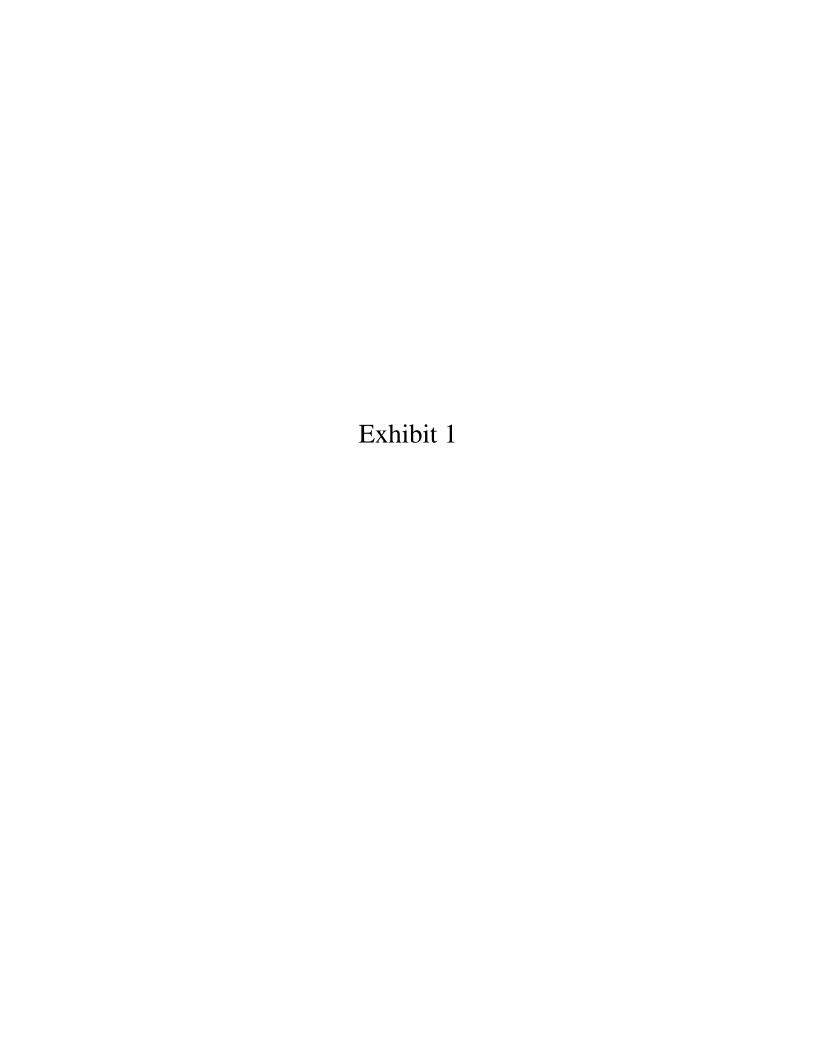
IV. THE MODIFIED PROJECT WITH BE REVIEWED BY CITY COUNCIL

The Modified Project's entitlement requests include legislative actions that will be reviewed by the City Council prior to approval regardless of any administrative appeals. (See LAMC Section 12.32.) Accordingly, the Modified Project and its Supplemental EIR will be considered by the elected decision making body for the City.

The Coalition asserts that the City "has declared the Project Approvals final prior to completing the administrative appeals of the Project's EIR." (Coalition June 20, 2018 Letter pp. 12-13, Coalition July 6, 2018 Letter p. 13.) Contrary to this claim, as explained above, the only entitlement for the Modified Project that has received an approval is the Vesting Tentative Tract Map – which the Coalition has appealed to the City Planning Commission. Therefore, there has been no final approval of any of the Modified Project's entitlements. Accordingly, the City will continue to consider the Modified Project's entitlements with the Supplemental EIR.

V. CONCLUSION

For the reasons stated herein, the Coalition's claims are erroneous and without merit. Accordingly, we respectfully request that the City Planning Department recommend approval of the Modified Project and denial of the Coalition's appeal of the VTTM.



SUNSET & GORDON MIXED USE PROJECT

July 2018 Overland Traffic Consultants, Inc. Response to June 19, 2018 RK Engineering Group, Inc. Letter

RK Engineering Group, Inc. prepared a response, dated June 19, 2018, (hereinafter referred to as the "RK Letter") to the Final Supplemental Environmental Impact Report ("EIR") for the Sunset and Gordon Mixed-Use Project (ENV-2015-1923-EIR, State Clearinghouse No. 2006111135). The RK Letter provided three comments regarding the Final Supplemental EIR's responses to comment related to transportation and traffic. Each comment in the RK Letter is addressed separately below.

RK Letter Comment 1

RK Letter Comment 1 to the Final Supplemental EIR is as follows:

"The FEIR response to comments did not feel that it was appropriate to assign project traffic north of Sunset Blvd. on Vine Street or Argyle, because the project was closer to the State Route 101 interchange at Hollywood Blvd. and because of possibly slower traffic on these alternative routes. According to the original traffic study approximately 15% of the project traffic is oriented north on State Route 101 and all of it was assign to the Hollywood Blvd. interchange. While it is true that the Hollywood Blvd. interchange is closer to the project than the other two interchanges, the actual travel distance north on the State Route 101 to the Vine Street interchange is actually longer (10-20%) for vehicle desiring to travel north than the other interchanges. Also, there is a substantial amount of traffic congestion on the southbound off-ramp at Hollywood Blvd. heading towards the project as shown in the screenshots included in Appendix A. Therefore, for project traffic heading south on the State Route 101 to the project, these alternative routes are plausible alternatives to what was studied in the original traffic study.

As a result of RK's comments a supplemental traffic analysis was performed in the FEIR/Response to Comments that did assume traffic would use these alternative routes to access the project site. It did conclude that with project mitigation (implementing a Transportation Demand Management Plan) the impacts at Vine Street at Sunset Blvd. could be adequately mitigated. If only 2% of the 15% is allocated to this intersection. It is very likely that more than 2% of the project trips would occur at this intersection. The reason this is important is the intersection of Vine Street at Sunset Blvd. is projected to operate at a poor level of service (LOS = E) and if one (1) more project trip makes the southbound left turn at the intersection it would make the project have a significant impact even with the proposed TDM Plan.

Even with the Transportation Demand Management Plan. Given the fact that Vine Street is a viable alternative to accessing the project from the southbound State Route 101 some improvement to this failing intersection should be included as project mitigation. Since it is very likely that more than 2% of the project will utilize the intersection of Vine Street and Sunset Blvd."

Response to RK Letter Comment 1

As stated in the March 2018 Sunset & Gordon Mixed Use Project Supplemental Traffic Analysis ("Supplemental Traffic Analysis") prepared by Overland Traffic Consultants and included as Appendix C to the Final Supplemental EIR, the trip distribution analyzed in the Modified Project's Traffic Study, included as Appendix G to the Draft Supplemental EIR, was selected in consultation with the Los Angeles Department of Transportation (LADOT) based on prevailing commuting traffic patterns in the area, including the location of entrances and exits to/from the Hollywood Freeway (SR-101). The trip distribution did not distribute trips between Vine Street and the Hollywood Freeway north of Sunset Boulevard because drivers are not reasonably likely to use Vine Street for access to or from the Hollywood Freeway because there are three alternative Freeway exits that are substantially closer to the Modified Project site than Vine Street and there is no Freeway entrance located on Vine Street. It is not reasonable as part of a traffic impact assessment to assume that drivers would exit a freeway four exits away from their destination and attempt to access that destination over congested surface streets.

To access the Project Site from the southbound Hollywood Freeway, the Modified Project's Traffic Study reasonably determined that drivers would utilize the two southbound Hollywood Freeway off-ramps that are closest to the Project Site rather than the southbound off-ramp at Vine Street – which is almost a mile away. The closest southbound Hollywood Freeway off-ramp to the Project Site is at Van Ness Avenue and Harold Way. This off-ramp is approximately 1,600 feet from the Project Site. The next closest southbound Hollywood Freeway off-ramp to the Project Site is at Hollywood Boulevard. This off-ramp is approximately 2,300 feet from the Project Site. There is even a third southbound off-ramp that is closer to the Project Site than the off-ramp at Vine Street, located at Gower Street and Yucca Street, which also was not included in the Traffic Study due to distance. As there are three closer southbound Hollywood Freeway off-ramps that can be used to access the Project Site than the southbound Vine Street off-ramp – which is over 4,700 feet away from the Project Site – it is not reasonable to assume that drivers would use the Vine Street off-ramp to access the Modified Project.

In addition to the overall added distance to the Project Site, if a driver were to use the Vine Street off-ramp, it is relevant that the additional distance the driver would need to cover to access the Project Site would occur on slower moving surface streets. It is well known that there are high volumes of traffic on surface streets in the Hollywood area during peak hour periods, making it extremely unlikely that drivers on the southbound Hollywood Freeway would exit the Freeway

four exits away from the Project Site to traverse the added distance on slow moving surface streets. Further, there are well-known high volumes of traffic generally on Vine Street during peak hours due to its central location in Hollywood. Accordingly, drivers would not be expected to use a freeway exit that is further from the Project Site to travel through a more congested area to access the Project Site, when there are closer alternative routes where drivers would experience less congestion over a shorter distance. Drivers' behavior indicates that less heavily traveled routes, roadways and intersections are chosen by regular commuters when possible. Accordingly, the Modified Project's Traffic Study appropriately concluded that drivers would not exit the Hollywood Freeway at Vine Street during peak hours to access the Project Site.

The RK Letter asserts that there is a substantial amount of traffic congestion on the southbound off-ramp at Hollywood Boulevard heading toward the Project Site and includes what appears to be a Google Maps screenshot of the off-ramp to support this assertion. Using this screenshot, the RK Letter argues that access to the Project Site from the Vine Street off-ramp is plausible. As noted above, Hollywood Boulevard is one of three closer southbound Freeway off-ramps that can be used to access the Project Site than the southbound Vine Street off-ramp. Even if the Hollywood Boulevard exit were congested, it is not reasonable to assume that drivers would exit the Freeway two exits prior to Hollywood Boulevard at Vine Street when there are three exits that are closer to the Modified Project. Further, the included screenshot does not support the RK Letter's assertion that Vine Street would be used to access the Project Site during peak hours. There is no information provided in the RK Letter of what time the screenshot was taken or the conditions of the Vine Street off-ramp at the same time. While the Vine Street exit is not provided on the screenshot, the screenshot does show that there is congested traffic on southbound Vine Street at the same time there is traffic on the Hollywood Boulevard off-ramp, which further supports the conclusion that drivers are unlikely to exit the Hollywood Freeway at Vine Street into a high-volume traffic situation.

To access the northbound Hollywood Freeway from the Project Site the Modified Project's Traffic Study reasonably determined that drivers would enter the Hollywood Freeway at the Hollywood Boulevard on-ramp, which is approximately 2,300 feet from the Project Site. There is no northbound entrance to the Hollywood Freeway at Vine Street; accordingly, drivers heading northbound on the Hollywood Freeway during the peak hours would not enter the Vine Street intersection. There is a northbound entrance to the Hollywood Freeway located at Argyle Avenue north of Franklin Avenue, which is approximately 4,400 feet away from the Project Site. Therefore, the Argyle Avenue on-ramp is an additional 2,100 feet (or 47%) further away from the Project Site than the northbound on-ramp at Hollywood Boulevard. Given the distance from the Project Site to this freeway entrance, and the fact that an entrance with multiple access routes is located much closer to the Project Site, the Modified Project's Traffic Study reasonably concluded drivers would not use Argyle Avenue to access the Hollywood Freeway during peak hours.

The RK Letter argues that while the Hollywood Boulevard interchange is closer to the Project Site, "the actual travel distance north on the State Route 101 to the Vine Street interchange is actually longer (10-20%) for vehicle (sic) desiring to travel north than the other interchanges." It

is not clear what the RK Letter is referring to when it states that the actual travel distance to the Vine Street interchange is actually longer.

When leaving the Project Site to head north on the Hollywood Freeway, to reach a point on the Freeway just beyond the Argyle onramp, it would take approximately 525 feet (0.1 mile) longer to get to that point by entering the Freeway at the Hollywood Boulevard entrance than it would by entering the Freeway at the Argyle Avenue entrance. This is because the curve in the Freeway adds slightly more distance than the path to the same point via surface streets. This is a negligible increase in total distance, and because of the slow moving surface streets in Hollywood and generally faster moving Freeway, the Hollywood Boulevard entrance to the Freeway is still more likely to be used because this Freeway entrance is substantially closer to the Project Site than the northbound on-ramp on Argyle Avenue (47% closer). Drivers are more likely to access the Freeway closer to the Project Site and reduce time spent on slower moving surface streets even if there is a small increase in travel distance once on the Freeway. Accordingly, the Modified Project's Traffic Study reasonably concluded that drivers would access the northbound Hollywood Freeway at Hollywood Boulevard.

In addition to the reasonable determination that drivers would not be expected to use Vine Street or Argyle Avenue for access to or from the Hollywood Freeway, based on traffic patterns and the uses along Vine Street the Modified Project's Traffic Study also reasonably determined that drivers would not be expected to utilize Vine Street to travel to/from retail/commercial land uses along Vine Street north of Sunset Boulevard during peak hours. While there are retail/commercial uses along this portion of Vine Street, almost none of them are accessible by vehicle on Vine Street and instead are accessible from alternative streets. Further, the majority of the retail/commercial uses north of Sunset Boulevard on Vine Street are within a ½ mile from the Project Site and are likely to be accessed from the Project Site by walking or bicycle instead of by vehicle. At pages 13-14 the Supplemental Traffic Analysis included a detailed discussion of the retail/commercial uses with storefronts on Vine Street north of Sunset Boulevard explaining why it is not reasonable to assume that drivers from the Modified Project would access those uses from Vine Street.

Accordingly, as further explained in the Supplemental Traffic Analysis, the Modified Project's Traffic Study was based on expert analysis of conditions on the ground in Hollywood and reasonable expectations of driver behavior based on those conditions, as well as conducted in consultation with LADOT and in compliance with CEQA and the CEQA Guidelines. Nevertheless, to be conservative and to provide additional information to the public and decision makers, the Final Supplemental EIR included a Supplemental Traffic Analysis that was prepared to: assign traffic on Vine Street north of Sunset Boulevard and on Argyle Avenue north of Sunset Boulevard during peak hours; analyze potential impacts at the additional three intersections of Sunset Boulevard and Argyle Avenue, Argyle Avenue and Hollywood Boulevard, and Argyle Avenue and the Hollywood Freeway northbound on-ramp; and evaluate potential impacts at the remaining intersections previously evaluated in the Modified Project's Traffic Study. This analysis was presented on pages 14 through 22 of the Supplemental Traffic Analysis.

In response to the Supplemental Traffic Analysis, the RK Letter argues without citation or support that more than 2% of the Modified Project's trips are likely to use Vine Street north of Sunset Boulevard. The Supplemental Traffic Analysis' selection to allocate 2% of the Modified Project's trips on Vine Street north of Sunset Boulevard was conservative. As stated above, the Modified Project's Traffic Study appropriately did not allocate trips north of Sunset Boulevard on Vine Street during peak hours based on reasonable assumptions for a traffic impact analysis that was considered, reviewed and approved by DOT. Accordingly, modifying the analysis to increase the trips on Vine Street north of Sunset Boulevard to 2% reflects a conservative analysis. As shown in Figure 5 of the Modified Project's Traffic Study, the Modified Project's trip distribution assumes that 30% of the Modified Project's trips are coming from/going to the north/northwest. This is a reasonable assumption as 20% of the trips are assumed to be coming from/going to the west; 20% are coming from/going to the east; and 30% are coming from/going to the south/southeast. Of the 30% of trips coming from/going to the north/northwest, the Modified Project's Traffic Study assumed 15% of those trips would utilize the Hollywood Freeway and 15% of those trips would utilize surface streets in Hollywood. For the 15% from surface streets the Modified Project's Traffic Study broke down the 15% as follows: 5% of trips north on Cahuenga Boulevard; 5% of trips north on Gower Street; and 5% of trips north on Bronson Avenue. As part of the Supplemental Traffic Analysis, this percentage was modified as follows: 1% of trips north on Cahuenga Boulevard; 2% of trips north on Vine Street; 2% of trips north on Argyle Avenue; 5% north on Gower Street; and 5% north on Bronson Avenue. Taking into account the distribution of the entire system, instead of just looking at one intersection in isolation, it is clear that allocating 2% of trips north on Vine Street is conservative.

Under these conservative assumptions, the Supplemental Traffic Analysis determined that the same intersections identified as significantly impacted by the Modified Project in the Draft Supplemental EIR would be significantly impacted by the Modified Project prior to mitigation: Bronson and Sunset during the A.M. Peak hour and Gower Street and Sunset during the P.M. Peak hour. Consistent with the Modified Project's Traffic Study, with the implementation of Mitigation Measures MM IV.K.1-1 and MM IV.K.1-2, which include physical intersection improvements, the Supplemental Traffic Analysis determined these intersections would not be significantly impacted by Modified Project traffic. In addition, it was determined that the intersection of Vine Street and Sunset Boulevard could be significantly impacted by the Modified Project during the P.M. Peak Hour in the absence of mitigation. While the Vine Street and Sunset Boulevard intersection has the potential to be significantly impacted, the Supplemental Traffic Analysis identified feasible mitigation that would reduce this impact to a less than significant level. Specifically, implementation of a Transportation Demand Management (TDM) Plan that incorporates enhanced measures to achieve a reduction in the Modified Project's vehicle trips by 10% during the P.M. Peak Hour would be more than sufficient to ensure that the Vine Street and Sunset Boulevard intersection would be mitigated to a level such that this intersection would not be significantly impacted by the Modified Project Traffic. Therefore, the RK Letter's comment regarding the Sunset Boulevard and Vine Street intersection was fully addressed in the Supplemental Traffic Analysis.

While the Supplemental Traffic Analysis fully addressed the RK Letter's comment regarding potential impacts at Sunset Boulevard and Vine Street and its conclusions are correct, it should be noted that the Supplemental Traffic Analysis (and the Traffic Study in the Draft Supplemental EIR) were prepared based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition. The ITE Trip Generation Manual has been updated to the 10th Edition Manual, which was published in September 2017. Given that use of the 10th Edition Manual is current best practices, an additional analysis has been conducted to update the Modified Project's trip generation assumptions to reflect the trip generation provided in the 10th Edition Manual. This analysis demonstrates that under current best practices, the Sunset Boulevard and Vine Street intersection would not be significantly impacted by Modified Project traffic and the less than significant impact with mitigation identified in the Supplemental Traffic Analysis would be further reduced. Put another way, use of the 10th Edition Manual shows that the potential for an impact at the Sunset Boulevard and Vine Street intersection is even lower than set forth in the Supplemental Traffic Analysis, which demonstrates the conservative nature of the Supplemental Traffic Analysis' assessment and conclusions regarding this intersection.

More specifically, the 10th Edition Manual includes additional data collected for many land uses for more accurate and refined trip generation rates, including for the uses proposed for the Modified Project. The additional data has been collected based on large amounts of more accurate electronic data that is now available for development projects. Further, the trip generation rates in the 10th Edition Manual were refined for greater relevancy to modern traffic patterns and trip generation by removing all data collected prior to year 1980. In updating to the 10th Edition Manual, many land uses were more clearly defined with Suburban, Urban, and Dense Urban rates to reflect the effect density has on traffic. Accordingly, a new estimate of the Modified Project's trip generation has been conducted using the state of the art data included in the 10th Edition Manual. The 10th Edition Manual trip generation rates for the Modified Project are presented below in Table 1.

Table 1 Modified Project Trip Generation ITE Trip Generation Manual, 10th Edition

	ITE	Daily	AM F	eak H	our	PM Peak Hour				
<u>Description</u>	<u>Code</u>	<u>Traffic</u>	Total	<u>In</u>	<u>Out</u>	Total	<u>In</u>	<u>Out</u>		
Multifamily Housing High Rise ¹	222	2.01	0.21	12%	88%	0.19	70%	30%		
Office ²	710	9.74	0.83	86%	14%	0.87	17%	83%		
Shopping Center ³	820	37.75	0.94	62%	38%	3.81	48%	52%		
Quality Restaurant ⁴	931	83.84	0.73	80%	20%	7.8	67%	33%		
Coffee/Donut Shop-No Drive Thru ⁵	936	754.55	101.14	51%	49%	36.31	50%	50%		
Public Park	411	0.78	0.02	59%	41%	0.11	55%	45%		

Rate for Housing is per unit, park per acre and all other per 1,000 square feet

In applying the 10th Edition Manual to the Modified Project this analysis used the Dense Multi-Use Urban rates where available. The ITE Trip Generation Manual defines Dense Multi-Use Urban as:

a fully developed area (or nearly so), with diverse and complementary land uses, good pedestrian connectivity and convenient and frequent transit. The area type can be well-developed urban areas outside a major metropolitan downtown or a moderate size urban area downtown.¹

These rates are most analogous to the Hollywood area, which is a densely populated urban area developed with a mix of uses including residential, office, and retail that are well served by transit and pedestrian connections. Where the Dense Multi-Use Urban rate was not available or where the sample size establishing the rate was not large enough, the General Urban/Suburban rate was used to ensure that the analysis remained conservative. The ITE Trip Generation Manual defines General Urban/Suburban as:

an area associated with almost homogeneous vehicle-centered access. Nearly all person trips that enter or exit a development site are by personal passenger or commercial vehicle. The area can be fully developed (or nearly so) at low-medium density with a mix of residential and commercial uses. The commercial land uses are typically concentrated at intersections or spread along commercial corridors, often surrounded by low density, almost entirely residential development. Most commercial buildings are located behind or surrounded by parking. The mixing of land uses is only in terms of their proximity, not in terms

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¹ High Rise Residential includes apartments that have more than 10 floors - Dense Multi-Use Urban (DM-UU)for Daily, AM & PM rates

² DM-UU rates for AM & PM Peak Hour, No rates for Daily, used General Urban/Suburban (GU/S) instead

³ Low Sample size for DM-UU rates AM & PM Peak Hour (no daily available), used GU/S instead

⁴ In/Out Percent for AM based on AM Peak Hour of Generator

⁵ GU/S rates used for AM & PM Peak due to low sample size of DM-UU rates, No Daily GU/S rate available used DM-UU rate instead No DM-UU rates for quality restaurant or public park, GU/S rates used

¹ Trip Generation Manual 10th Edition, Volume 1: Desk Reference, September 2017 Institute of Transportation Engineers, page 22

of function. A retail and use may focus on serving a regional clientele or a services land use may target motorists or pass-by vehicle trips for its customers. Even if the land uses are complementary, a lack of pedestrian, bicycling, and transit facilities or services limit non-vehicle travel.²

In addition, in order to present conservative trip generation estimates, where the Dense Multi-Use Urban rate is used in this updated assessment, the 10% transit credit that was applied to the Modified Project's prior trip generation prepared under the 9th Edition Manual has been removed from the analysis since it is assumed the Dense Multi-Use Urban rates already reflect transit usage.

The Modified Project's trip generation using the 10th Edition Manual is presented in Table 2 with a comparison to the prior 9th Edition Manual, which was utilized for the Modified Project's Traffic Study and Supplemental Traffic Analysis. As demonstrated in Table 2, utilizing the 10th Edition Manual's trip generation rates produces fewer vehicle trips than the 9th Edition Manual resulting in 1,221 fewer daily trips, 101 fewer AM Peak Hour trips, and 128 fewer PM Peak Hour trips.

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² Trip Generation Manual 10th Edition, Volume 1: Desk Reference, September 2017, Institute of Transportation Engineers, page 22

 $\begin{array}{c} \text{Table 2} \\ \text{Modified Project Trip Generation \& Comparison of Trips Using} \\ 10^{\text{th}} \text{ Edition Manual \& 9}^{\text{th}} \text{ Edition Manual} \end{array}$

	on Manual &	Daily	AM F	Peak Ho	our	PM	lour	
<u>Description</u>	<u>Size</u>	Traffic	Total	<u>In</u>	<u>Out</u>	Total	<u>In</u>	<u>Out</u>
Proposed Project								
Apartment	299 units	601	63	8	55	57	40	17
Transit	0%	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Subtotal Apartment		601	63	8	55	57	40	17
Office	38,440 sf	374	32	27	5	33	6	28
Transit (10% for Daily GU/S rate only)	0%	<u>(37)</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Subtotal Office		337	32	27	5	33	6	28
Community Serving Retail	2,495 sf	94	2	1	1	10	5	5
Transit	10%	(9)	(0)	(0)	(0)	(1)	(1)	0
Internal Trips	10%	(8)	(0)	(0)	(0)	(1)	(0)	(1)
Pass-By	50%	<u>(38)</u>	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(4)</u>	<u>(2)</u>	<u>(2)</u>
Subtotal Retail		39	2	1	1	4	2	2
Quality Restaurant	3,700 sf	310	3	2	1	29	19	10
Transit	10%	(31)	(0)	(0)	(0)	(3)	(2)	(1)
Internal Trips	10%	(28)	(0)	(0)	(0)	(3)	(2)	(1)
Pass-By	10%	(25)	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>	<u>(2)</u>	(1)	<u>(1)</u>
Subtotal Restaurant		226	3	2	1	21	14	7
Coffee Shop-No Drive Thru	1,475 sf	1,113	149	76	73	54	27	27
Transit (except Daily DM-UU rate)	10%	0	(15)	(8)	(7)	(5)	(2)	(3)
Internal Trips	20%	(223)	(27)	(14)	(13)	(10)	(5)	(5)
Pass-By	50%	(445)	<u>(54)</u>	(27)	(27)	(19)	<u>(10)</u>	<u>(9)</u>
Subtotal Coffee Shop		445	53	27	26	20	10	10
Public Park	18,962 sf	0	0	0	0	0	0	0
Transit	10%	(0)	<u>(0)</u>	(0)	(0)	<u>(0)</u>	<u>(0)</u>	<u>(0)</u>
Subtotal Park		0	0	0	0	0	0	0
Total Prepared ITE 40th Ed		1 6 4 9	152	GE.	00	125	74	64
Total Proposed ITE 10th Ed.		1,648	153	65	88	135	71	64
Total Proposed ITE 9th Ed. (in Study)		2,869	254	108	146	263	145	118
Difference ITE Trips 10th Ed - 9th Ed		(1,221)	(101)	(43)	(58)	(128)	(74)	(54)

DM-UU = Dense Multi-Use Urban

GU/S = General Urban/Suburban

Utilizing the more current 10th Edition Manual, demonstrates that the impacts of the Modified Project are overestimated in the Modified Project's Traffic Study and Supplemental Traffic Analysis. Using the 10th Edition Manual, all of the study intersections would have less traffic from the Modified Project than was anticipated using the 9th Edition Manual. Specifically, for Sunset Boulevard and Vine Street, utilizing the same distribution assumptions as those from the Supplemental Traffic Analysis, but updating to the 10th Edition Manual, the intersection of Sunset Boulevard and Vine Street would have a less than significant impact without mitigation.

Accordingly, under the 10th Edition Manual, implementation of MM K.1.3, which provides for a robust Transportation Demand Management (TDM) Plan, would no longer be required to mitigate the potentially significant impact at Sunset Boulevard and Vine Street. The Critical Movement Analysis (CMA) summary for Sunset Boulevard and Vine Street applying the distribution assumptions from the Supplemental Traffic Analysis is provided below in Table 4 with the CMA worksheet attached (Attachment A).

Table 3
Future Conditions CMA Summary: ITE Trip Generation Manual, 10th Edition
Distribution from Supplemental Traffic Analysis: 2% of Modified Project traffic north on Vine
Street (Traffic making southbound left/westbound right)

Intersection	Time Period	Future without Project	Future with Project	Impact	Significant Impact?	Mitigation Required?
Sunset Boulevard &	AM	0.851 D	0.851 D	0.002	NO	NO
Vine Street	PM	0.971 E	0.976 E	0.005	NO	NO

In addition, by using the 10th Edition Manual, the Supplemental Traffic Analysis' conservative assumption that 2% of the Modified Project's trips would occur north on Vine Street (making a southbound left/westbound right) could increase to 10% of the Modified Project's trips during the peak hour without significantly impacting the intersection of Vine Street and Sunset Boulevard. Put another way, an additional seven vehicle trips could occur at the intersection without significantly impacting the intersection, and without the need to implement the TDM Plan provided for in MM K.1.3 as mitigation. For the various reasons stated above regarding the anticipated use of Vine Street for the Modified Project, it is unreasonable to assume that 10% of the Modified Project's trips would make a southbound left/westbound right at the Sunset Boulevard and Vine Street intersection. This would represent 1/3rd of all trips that are assumed to be coming from/going to the north/northwest for the Modified Project. While this is an unreasonable assumption, this analysis was included to demonstrate that by utilizing the 10th Edition Manual, which is current best practice in transportation impact analyses, a substantial increase in traffic could occur at the Vine Street and Sunset Boulevard intersection associated with the Modified Project without resulting in a potentially significant traffic impact. The CMA summary for Sunset Boulevard and Vine Street applying the modified distribution assumptions of 10% of the Modified Project trips making a southbound left/westbound right at Sunset Boulevard and Vine Street is provided is provided below in Table 4 with the CMA worksheet attached (Attachment A).

Table 4
Future Conditions CMA Summary: ITE Trip Generation Manual, 10th Edition
Modified Distribution: Sunset Boulevard & Vine Street 10% of Modified Project traffic north on
Vine Street (Traffic making southbound left/westbound right)

Intersection	Time Period	Future without Project	Future with Project	Impact	Significant Impact?	Mitigation Required?
Sunset Boulevard &	AM	0.851 D	0.855 D	0.004	NO	NO
Vine Street	PM	0.971 E	0.980 E	0.009	NO	NO

Therefore, based on the analysis above and contrary to the RK Letter's assertions, the Modified Project would have a less than significant impact at Sunset Boulevard and Vine Street even under an unreasonable assumption where the amount of Modified Project-related traffic going through that intersection is substantially increased.

RK Letter Comment 2

RK Letter Comment 2 to the Final Supplemental EIR is as follows:

"As a result of RK's comments the supplemental traffic study in the FEIR/Response to Comments included an internal queuing analysis for the project. That analysis addressed the queuing for the separate entrances to the commercial gates and residential gates. It concluded that there is adequate storage available for both the commercial and residential areas of the project.

However, in reviewing the detailed site plan, it appears that the queuing for the residential gates was to occur in a short left turn pocket located away from the actual residential gate. It is likely that residential vehicles will creep up towards the gate itself and block circulation leaving the project. This will also result in conflicts with the "Flex" parking spaces that will need to back into the main circulation aisle. Furthermore, there is no means for vehicles who accidentally enter the left turn pocket to make a U-turn out of the site in the event they erroneously enter the building, because there is insufficient turn around space

Finally, how will guests enter the residential gated area? The queueing into the residential area would be much longer than assumed in the study and would cause additional queueing blocking the entrance to the site and back into Gordon Street. The time for non-residents to open the gate would be substantially longer. Therefore queuing of the project onto Gordon will cause delays to through traffic on the street. Which will cause delays to existing traffic. How will this be addressed and what are the potential impacts to both on-site and off-site traffic?"

Response to RK Letter Comment 2

The Supplemental Traffic Analysis included a queuing analysis for the Modified Project and concluded that there is adequate on-site queue space under conservative estimates and that the vehicle queue would not extend beyond the boundaries of the Modified Project site such that it would have the potential to affect vehicles traveling on Gordon Street. As provided in the Supplemental Traffic Analysis, the Modified Project garage provides a main drive aisle from the driveway that is shared by both the Modified Project's residential and commercial components. The shared drive aisle expands to two lanes that separate the residential traffic from the commercial traffic (one turning left for residential and one turning right for commercial). Because of this interior separation of traffic, the residential queue and commercial queue were evaluated separately and then combined to determine if the on-site vehicle storage space was sufficient to accommodate queues. As provided in the Supplemental Traffic Analysis, the combined maximum queue of seven vehicles during the AM Peak Hour (comprised of one vehicle associated with residential uses and six vehicles associated with the commercial uses) and combined maximum of six vehicles during the PM Peak Hour (comprised of two vehicles associated with residential uses and four vehicles associated with the commercial uses) can be accommodated within the Modified Project's parking garage, which provides space for eleven vehicles to queue prior to entry through the access gates. Conservative estimates of the time it would take for drivers accessing both residential and commercial areas to gain access through gates were used in the queue analysis as explained in the Supplemental Traffic Analysis on pages 28 and 29.

The RK Letter comments that in accessing the residential portion of the garage, "vehicles will creep up towards the gate itself and block circulation leaving the project" and will "result in conflicts with . . . parking spaces that will need to back into the main circulation aisle." The queuing analysis of the Modified Project was conducted to evaluate whether queuing for the Modified Project would have the potential to affect vehicles traveling on Gordon Street. The L.A. CEQA Thresholds Guide (2006) does not require that a proposed project evaluate parking conditions on-site but instead require evaluation of a project's parking access and circulation to vehicular traffic on the existing traffic system. Accordingly, the Supplemental Traffic Analysis's assessment of impacts to Gordon Street is the appropriate focus on the queuing analysis. Potential internal temporary delays will not create back ups onto Gordon Street that would affect public roadways. As a result, the comments raised by the RK Letter regarding potential temporary conflicts that could arise in the internal workings of the garage are not evaluated as part of a queuing analysis because these conflicts would not have an impact on drivers on Gordon Street but would instead only result in slowing the exit for vehicles already within the parking garage. Further, such internal conflicts within a parking garage are typical as vehicles enter and exit parking spaces. The RK Letter also states that there is no left turn pocket to make a U-turn out of the site in the event that a vehicle erroneously enters the building. Like most garages in the City of Los Angeles, if a vehicle enters the garage accidentally and wants to exit immediately the vehicle will likely need to enter the parking area in order to exit. This is not an unusual circumstance for a parking garage, as garages are not designed for accidental entry. Regardless, were a vehicle to accidently enter the garage and need to turn around within the garage, this would not result in a potential affect to vehicles traveling north or south on Gordon Street.

The RK Letter also asks how guests will enter the residential gated area. As explained in the Supplemental Traffic Analysis, residents will have an entry card/fob sensor to quickly activate the entry gates. Accordingly, some guests who will be using resident parking spaces would access the residential parking area with a guest's entry card or fob sensor. Other guests of the Project Site may choose to park in the commercial parking area in which case they will access the parking area with a ticket. The LAMC does not require specific residential guest parking spaces for the Modified Project under Parking Option 1. Were a residential guest to park in the residential area their access time is anticipated to be similar to a residents, which as described in the Supplemental Traffic Analysis was estimated at a conservative 13 seconds.³ Were a guest to utilize the commercial parking area a conservative 40-second service rate was assumed. Accordingly, the queuing analysis accounted for conservative service rates and guest queuing would not be longer than estimated. Therefore, no impact to Gordon Street will occur for vehicles queuing at the Modified Project.

RK Letter Comment 3

RK Letter Comment 3 to the Final Supplemental EIR is as follows:

"The response to comments states that the residential portion of the project does not need to be included in the neighborhood street system evaluation. In reviewing the latest LADOT Traffic Study Guidelines it only says that a project which has commercial needs to assess the neighborhood street system review, not necessarily just the commercial component of the mixed use project. For the Sunset and Gordon mixed use project the residential component of the mixed use project generates 62% of the projects daily traffic. None of these trips (a total of 1,789 trips per day) were included in the neighborhood street traffic evaluation.

Since CEQA requires a full evaluation of the project's impact to the surrounding community the entire number of trips generated by the project (commercial and residential) must be included in this analysis and if it is determined that the project causes a significant impact then mitigation measures should be identified to reduce or eliminate these impacts. RK updated the neighborhood traffic analysis in the attached Table 13b (Revised). When including the full project including the residential component significant unmitigated project impacts will occur at the nearby neighborhood street."

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³ According to analysis conducted of parking structures the service time for a ticketed parking structures is 9 seconds. Parking Structures: Planning, Design, Construction, Maintenance and Repair, Third Edition, Kluwer Academic Publishers, 2001: P.140 (Chrest, Anthony P., Mary S. Smith, Sam Bhuyan, Mohammad Iqbal, and Donald R. Monahan).

Response to RK Letter Comment 3

As explained in the Final Supplemental EIR in Section III.B Response to Comment Letters Page III.B-74 – 75 (Response to Comment 5A.29), contrary to the RK Letter, the Modified Project's residential street segment traffic analysis was conducted in compliance with CEQA and LADOT's procedures and guidelines. The LADOT Traffic Study Policies and Procedures, August 2014 Pages 16-17 and updated Transportation Impact Study Guidelines, December 2016 Pages 8-9 provide residential street impact analysis requirements and impact identification. The August 2014 guidelines state "commercial projects may be required to conduct residential street impact analysis. A local residential street can be potentially impacted based on an increase in the average daily traffic volumes. The objective of the residential street analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from a Project". Page 16 goes on to explain that "[w]hen selecting residential street segments for analysis during the traffic study scoping process, all of the following conditions must be present: - the project is a nonresidential development and not a school". The December 2016 guidelines reiterate these same statements. Therefore, consistent with LADOT procedures and guidelines, a residential street segment traffic analysis must be completed for commercial projects but is not required for residential projects. This is because the purpose of a residential street segment analysis is to determine whether new commercial uses are causing intrusion into a residential neighborhood, and not because of new residents. Because the Modified Project has both residential and commercial components, the Modified Project's Traffic Study was required to evaluate potential neighborhood cut-through traffic of its commercial component only. As explained in the Final Supplemental EIR, this approach is consistent with how other traffic studies of mixed-use projects are conducted in the City of Los Angeles.

The RK Letter states that "CEQA requires a full evaluation of the project's impact to the surrounding community" and therefore, the RK Letter argues that the residential street segment traffic analysis should include the residential trips contrary to the LADOT procedures and guidelines. With regard to Transportation/Traffic, CEQA Appendix G asks, would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Contrary to the RK Letter's assertion, the inquiry is whether the project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system as a whole. The focus of the analysis is the performance of the entire circulation system based on applicable plans and policies. The LADOT's policies and procedures choice to only evaluate potential residential street segment cut-through traffic of commercial trips only is consistent with CEQA Appendix G and reflects the City's independent judgment about how to evaluate impacts to the entire circulation system.

In an older version of the CEQA Appendix G, which is quoted in the RK Letter, the focus of the threshold was whether the project would "[c]ause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?" However, that language was amended effective March 18, 2010 as part of implementation of Senate Bill 97, which directed the Natural Resources Agency to develop amendments to the CEQA Guidelines. The traffic and transportation language in Appendix G changed intentionally so that lead agencies would change the focus of the traffic analysis away from a project's effect on an increase in traffic to a project's effect on the overall circulation system because increases in vehicle trips are not necessarily indicators of a potentially significant environmental impact. The City's decision to focus only on the commercial trips for the residential street segment traffic analysis is consistent with the changes to traffic and transportation analysis required by Senate Bill 97. Accordingly, contrary to the RK Letter's assertion, by following the LADOT's policies and procedures, the Modified Project's residential street segment traffic analysis was conducted in compliance with CEQA and the CEQA Guidelines.





(Circular 212 Method)

I/S #:	North-South Street:	VINE ST				Year of Count: 2016			Ambient Growth: (%): 1			1	Condu	cted by:	L	С	Date: 7/6/2018		7/6/2018	
5	East-West Street:	SUNSET	BL			Projec	ction Year	2018		Pea	ak Hour:	AM	Revie	wed by:			Project:	SUNSE	T-GORD	ON MU
	No. o osed Ø'ing: N/S-1, E/W-2 o Turns: FREE-1, NRTOR-2 o		NB 3 EB 0	SB WB	4 0 0 0	NB EB	3 SE		NB EB	3	SB WB	4 0 0 0	NB EB	3	SB WB	4 0 0 0	NB EB	3	SB WB	4 0 0
	ATSAC-1 or ATSAC+ Override			2	2		0	2 0			2	2	20	Ū	2	2 0		Ū	,,,,	2
			EXISTI	NG CONDI	TION	EXISTI	NG PLUS PI	ROJECT	FUTURE CONDITION W/O PROJECT									W/ PROJE	CT W/ MITI	GATION
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
₽	Left		105	1	105	0	105	105	0	107	1	107	0	107	1	107	0	107	1	107
NORTHBOUND	← Left-Through ↑ Through ↑ Through-Right ↑ Th		734	0 2 0	367	0	734	367	64	813	0 2 0	407	0	813	0 2 0	407	0	813	0 2 0	407
ОКТН	← Right ← Left-Through-Right		172	1	11	3	175	10	20	195	1	1	3	198	1 0	0	0	198	1 0	0
Z	Left-Right			0							0				0				0	
QND	└ Left ├ Left-Through		65	1	65	1	66	66	8	74	1 0	74	1	75	1 0	75	0	75	1 0	75
SOUTHBOUND			1065 132	1 1 0	599 132	0	1065 132	599 132	81	1167 135	1 1 0	651 135	0	1167 135	1 1 0	651 135	0	1167 135	1 1 0	651 135
son	Left-Right		132	0 0 0	132	U	132	132	U	133	0	133	U	133	0	133	U	133	0	133
ı	ے Left		52	1	52	0	52	52	0	53	1	53	0	53	1	53	0	53	1	53
QNDC			892	0 2	321	7	899	324	60	970	0 2	348	7	977	0 2	350	0	977	0 2	350
EASTBOUND	→ Through-Right → Right		72	1 0	72	0	72	72	0	73	1 0	73	0	73	1 0	73	0	73	1 0	73
ā	Left-Through-Right			0							0				0				0	
9	✓ Left ✓ Left-Through		161	1 0	161	4	165	165	30	194	1 0	194	4	198	1 0	198	0	198	1 0	198
WESTBOUND	← Through ← Through-Right		1367	2 1	474	10	1377	478	38	1432	2 1	496	10	1442	2 1	500	0	1442	2	500
WEST	Right Left-Through-Right Left-Right		54	0 0 0	54	2	56	56	1	56	0 0 0	56	2	58	0 0 0	58	0	58	0 0 0	58
	CRITICAL VOLUMES		North-South: East-West: SUM:		704 526 1230	North-South: East-West: SUM:		704 530 1234	North-South: East-West:		th-South:	758 549 1307	North-South: East-West: SUM:		758 553 1311	3 East-West		th-South:	758 553 1311	
	VOLUME/CAPACITY (V/C) RATIO:			0.895			0.897				0.951				0.953				0.953
V/C	LESS ATSAC/ATCS ADJU				0.795			0.797				0.851				0.853				0.853
	LEVEL OF SERVICE (LOS): C		С			С				D				D				D		

REMARKS:

Version: 1i Beta; 8/4/2011

ADDED 2% in southbound left & 2% out westbound right - NO ADDL TDM

PROJECT IMPACT

Change in v/c due to project: 0.002 $\Delta v/c$ after mitigation: 0.002 Significant impacted? NO Fully mitigated? N/A



(Circular 212 Method)



I/S #:	North-South Street:	VINE ST				Year of Count: 2016			Ambient Growth: (%): 1			1	Conducted by:		L	LC Date:		7/6/2018		
5	East-West Street:	SUNSET	BL			Projec	ction Year	2018		Pea	ak Hour:	PM	Reviewed by:				Project:	SUNSE	SUNSET-GORDON	
	oosed Ø'ing: N/S-1, E/W-2 or		NB 3	SB	4 0 0	NB	3 SI	4 0 3 0	NB	3	SB	4 0 0	NB	3	SB	4 0 0	NB	3	SB	4 0 0
Right	Turns: FREE-1, NRTOR-2 o	r OLA-3?	EB 0	WB	0	EB	0 W		EB	0	WB	0	EB	0	WB	0	EB	0	WB	0
	ATSAC-1 or ATSAC+ Override				1 0			1 0	,			1 0	,			1 0				1 0
			EXISTI	NG CONDI	TION	EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTUF	RE CONDIT	ION W/ PR	OJECT	FUTURE W/ PROJECT W/ MITIGATIO			
	MOVEMENT		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
₽	↑ Left		102	1	102	0	102	102	0	104	1	104	0	104	1	104	0	104	1	104
NORTHBOUND	← Left-Through ↑ Through ↑ Through-Right		1127	0 2 0	564	0	1127	564	108	1258	0 2 0	629	0	1258	0 2 0	629	0	1258	0 2 0	629
黃	Right		180	1	18	3	183	18	50	234	1	22	3	237	1	22	0	236	1	21
💆	← Left-Through-Right			0							0				0				0	
	← Left-Right			0							0				0				0	
	└ Left		106	1	106	1	107	107	1	109	1	109	1	110	1	110	0	110	1	110
OUTHBOUND	Left-Through			0	.00						0	.00			0		Ĭ		0	
) g	Through		957	1	547	0	957	547	89	1065	1	602	0	1065	1	602	0	1065	1	602
崔	→ Through-Right → Right		136	1 0	136	0	136	136	0	139	1 0	139	0	139	1 0	139	0	139	1 0	139
Ö	Left-Through-Right		100	0	130		130	130		155	0	100	0	100	0	155		100	0	133
Ö	↓ Left-Right			0							0				0				0	
	ر ک Left		64	4	64	0	64	64	0	65	1	65	0	65	1	65	0	65	1	65
9	∠ Left-Through		04	0	64	0	64	64	U	65	0	65	U	65	0	65	U	65	0	65
EASTBOUND	→ Through		1275	2	455	8	1283	457	52	1353	2	481	8	1361	2	484	0	1361	2	484
I B	→ Through-Right		00	1	00		00	00		0.4	1	0.4		0.4	1 0	0.4		0.4	1	0.4
.AS	Right Left-Through-Right		89	0 0	89	0	89	89	0	91	0	91	0	91	0	91	0	91	0	91
ш ш	∠ Left-Right			0							0				0				Ö	
	<i>C</i>		400							0.10	,			0.1-				6.1-		
9			162	1 0	162	3	165	165	47	212	1 0	212	3	215	1 0	215	0	215	1 0	215
WESTBOUND	← Through		1126	2	406	7	1133	408	98	1247	2	450	7	1254	2	452	0	1254	2	452
18(Through-Right			1							1				1				1	
ES.	Right Left-Through-Right		91	0 0	91	1	92	92	9	102	0	102	1	103	0	103	0	103	0	103
>	Left-Right			0							0				0				0	
				th-South:	670		rth-South:	671			th-South:	738			th-South:	739			th-South:	739
	CRITICAL VOLUMES		E	ast-West:	617 1287	E	East-West:	622		E	ast-West: SUM:	693		E	ast-West:	699 1438		E	ast-West:	699
	VOLUME/CAPACITY (V/C	:) RATIO:		SUM:			SUM:	1293 0.940			SUIVI:	1431			SUM:	1.046			SUM:	1.046
V/C	C LESS ATSAC/ATCS ADJU	,			0.936 0.866			0.940 0.870				1.041 0.971				1.046 0.976				1.046 0.976
"	LEVEL OF SERVICE	_			0.866 D			0.870 D				0.971 E				0.976 E				0.976 E
<u> </u>		EMARKS:			ט	High ped vo	aluma	<u> </u>	<u> </u>				<u> </u>				I			_

2

REMARKS:

High ped volume

ADDED 2% in southbound left & 2% out westbound right - NO ADDL

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in v/c due to project: 0.005 Significant impacted? NO

 $\Delta v/c$ after mitigation: 0.005 Fully mitigated? N/A



(Circular 212 Method)



I/S #:	North-South Street:	VINE ST				Year of Count: 2016			Ambient Growth: (%): 1			1	Conducted by:		L	LC Date		7/6/2018		
5	East-West Street:	SUNSET	BL			Projec	ction Year	2018		Pea	k Hour:	AM	Reviewed by:			Project: SUN		UNSET-GORDON M		
		f Phases			4			4				4				4				4
Opp	osed Ø'ing: N/S-1, E/W-2 or	Both-3?	ND 2	CD.	0	MD	2 6	0	A/D	3	CD.	0	A/D	3	CD.	0	N/D	2	CD	0
Right	Turns: FREE-1, NRTOR-2 or	r OLA-3?	NB 3 EB 0	SB WB	0	NB EB	3 SE 0 W		NB EB	0	SB WB	0	NB EB	0	SB WB	0	NB EB	3	SB WB	0
	ATSAC-1 or ATSAC+	ATCS-2?	LD-	112	2		0 11.	2		0	112-	2	LD-	0	112	2		· ·	112	2
	Override (Capacity			0			0				0				0				0
			EXISTI	NG CONDI	TION	EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTUF	RE CONDIT	ION W/ PR	OJECT	FUTURE W/ PROJECT W/ MITIGATIO			
	MOVEMENT			No. of	Lane	Project Total Lane		Added	Total	No. of	Lane	Added	Total	No. of	Lane	Added	Total No. of		Lane	
	5 1-4		Volume	Lanes	Volume	Traffic	Volume	Volume	Volume	Volume	Lanes	Volume	Volume	Volume	Lanes	Volume	Volume	Volume	Lanes	Volume 107
9	↑ Left Left-Through		105	1 0	105	0	105	105	0	107	1 0	107	0	107	1 0	107	0	107	1 0	107
ΙāΙ	↑ Through		734	2	367	0	734	367	64	813	2	407	0	813	2	407	0	813	2	407
Ιĕ	Through-Right			0							0				0				0	
NORTHBOUND	Right		172	1	11	3	175	10	20	195	1	1	3	198	1	0	0	198	1	0
9	Left-Through-Right			0							0				0				0	
				0							0				0				0	
	└ Left		65	1	65	6	71	71	8	74	1	74	6	80	1	80	0	80	1	80
OUTHBOUND				0							0				0				0	
l ŭ l	Through		1065	1	599	0	1065	599	81	1167	1	651	0	1167	1	651	0	1167	1	651
▍≝▏	→ Through-Right		400	1 0	400	0	132	132	0	135	1 0	135	0	105	1 0	105	0	135	1 0	135
5	→ Right → Left-Through-Right		132	0	132	U	132	132	U	135	0	135	U	135	0	135	0	135	0	135
Š	Left-Right			0							0				0				0	
	Left		52	1	52	0	52	52	0	53	1	53	0	53	1	53	0	53	1	53
			892	0 2	321	7	899	324	60	970	0 2	348	7	977	0 2	350	0	977	0 2	350
BO	→ Through-Right		002	1	021	,	000	024	00	370	1	040	,	377	1	000		311	1	000
EASTBOUND	Right		72	0	72	0	72	72	0	73	0	73	0	73	0	73	0	73	0	73
ā	Left-Through-Right			0							0				0				0	
	-			0							0				0				0	
	√ Left		161	1	161	4	165	165	30	194	1	194	4	198	1	198	0	198	1	198
WESTBOUND				0							0				0				0	
8	← Through		1367	2	474	10	1377	480	38	1432	2	496	10	1442	2	502	0	1442	2	502
1 1 1	← Through-Right ← Right		54	1 0	54	9	63	63	1	56	1 0	56	9	65	1 0	65	0	65	1 0	65
l ğ	Left-Through-Right		J-1	0	J- 1	3	03	03	'	50	0	30	3	03	0	- 03		0.5	0	- 03
>	├ Left-Right			0							0				0				0	
	, ,		-	th-South:	704		rth-South:	704			th-South:	758			th-South:	758			th-South:	758
	CRITICAL VO	ULUMES	Ea	ast-West: SUM:	526 1230	"	ast-West: SUM:	532 1236		Ea	ast-West: SUM:	549 1307		E	ast-West: SUM:	555 1313		E	ast-West: SUM:	555 1313
	VOLUME/CAPACITY (V/C) RATIO:		SUIVI:			SUIVI:				SUIVI:	0.951			SUM:	0.955			SUIVI:	0.955
VIC	LESS ATSAC/ATCS ADJUS	,			0.895			0.899												
V/C					0.795			0.799				0.851 D				0.855				0.855
<u> </u>	LEVEL OF SERVIC	MARKS:			С			С				ע				D				D

REMARKS:

Version: 1i Beta; 8/4/2011

ADDED 10% in southbound left & 10% out westbound right - NO ADDL TDM

PROJECT IMPACT

Change in v/c due to project: 0.004 $\Delta v/c$ Significant impacted? NO

 $\Delta v/c$ after mitigation: 0.004 Fully mitigated? N/A



(Circular 212 Method)



I/S #:	North-South Street: VI	NE ST			Year of Count: 2016			Ambient Growth: (%):			1	Conducted by:			С	Date:	7/6/2018		
5		JNSET BL			Projec	ction Year	2018		Pea	ak Hour:	PM	Revie	wed by:	Pro		Project:	SUNSE	T-GORD	ON MU
	No. of Ph osed Ø'ing: N/S-1, E/W-2 or Bo	th-3?	SB	4 0 0	NB	3 SE	4 0 0	NB	3	SB	4 0 0	NB	3	SB	4 0 0	NB	3	SB	4 0 0
Right	Turns: FREE-1, NRTOR-2 or OL	.A-3? NB 0	WB	0	EB	0 W		EB	0	WB	0	EB	0	WB	0	EB	0	WB	0
	ATSAC-1 or ATSAC+ATC Override Cap			1 0			1 0				1 0				1 0				1 0
		EXIST	ING CONDI	TION	EXISTING PLUS PROJEC		ROJECT	FUTUR	E CONDITI	ON W/O PR	OJECT	FUTUF	RE CONDIT	ION W/ PR	OJECT	FUTURE	W/ PROJE	CT W/ MIT	IGATION
	Volume L		No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
۵	Left	102	1	102	0	102	102	0	104	1	104	0	104	1	104	0	104	1	104
NORTHBOUND	← Left-Through ↑ Through ↑ Through-Right	1127	0 2 0	564	0	1127	564	108	1258	0 2 0	629	0	1258	0 2 0	629	0	1258	0 2 0	629
黃	→ Right	180	1	18	3	183	18	50	234	1	22	3	237	1	22	0	236	1	21
ğ	Left-Through-Right		0							0				0				0	
	← Left-Right		0							0				0				0	
_ 1	└ Left	106	1	106	7	113	113	1	109	1	109	7	116	1	116	0	116	1	116
N N	↓ Left-Through	100	0	100	,	110	110		100	0	100		110	0	110		110	0	1.0
١٥	Through	957	1	547	0	957	547	89	1065	1	602	0	1065	1	602	0	1065	1	602
🖁	← Through-Right → Right	136	1 0	136	0	136	136	0	139	1 0	139	0	139	1 0	139	0	139	1 0	139
OUTHBOUND	Left-Through-Right	130	0	130	U	130	130	U	139	0	139	0	139	0	139		139	0	139
Ø	Left-Right		0							0				0				0	
	1 1-6	L 04	1 4			0.4	0.4		0.5	4	0.5	0	05	4	05		0.5		0.5
₽		64	1 0	64	0	64	64	0	65	1 0	65	0	65	1 0	65	0	65	1 0	65
\(\)	→ Through	1275	2	455	8	1283	457	52	1353	2	481	8	1361	2	484	0	1361	2	484
EASTBOUND	→ Through-Right		1		_	0.5	0.5			1				1				1	2.6
AS	Right Left-Through-Right	89	0	89	0	89	89	0	91	0	91	0	91	0	91	0	91	0	91
ш	Left-Right		0							0				0				0	
	*																		
₽		162	1 0	162	3	165	165	47	212	1 0	212	3	215	1 0	215	0	215	1 0	215
WESTBOUND		1126	2	406	7	1133	410	98	1247	2	450	7	1254	2	454	0	1254	2	454
l B	Through-Right		1							1				1				1	
ES.	Right	91	0	91	6	97	97	9	102	0	102	6	108	0	108	0	108	0	108
>	Left-Through-Right Left-Right		0							0				0				0	
	North-South		•	670	No	rth-South:	677		Nor	th-South:	738		Nor	th-South:	745		Nor	th-South:	745
	CRITICAL VOLU	IMES E	ast-West:	617	E	ast-West:	622		E	ast-West:	693		E	ast-West:	699		E	ast-West:	699
-	VOLUME/CARACITY (WO) R	ATIO:	SUM:	1287		SUM:	1299			SUM:	1431			SUM:	1444			SUM:	1444
1//0	VOLUME/CAPACITY (V/C) RA LESS ATSAC/ATCS ADJUSTM			0.936			0.945				1.041				1.050				1.050
V/C				0.866			0.875				0.971				0.980				0.980
	LEVEL OF SERVICE (L	D	High ped v	aluma	D				Е				Е				Е		

2

Version: 1i Beta; 8/4/2011

ADDED 10% in southbound left & 10% out westbound right - NO ADDL TDM

PROJECT IMPACT

Change in v/c due to project: 0.009 Significant impacted? NO

 $\Delta v/c$ after mitigation: 0.009 Fully mitigated? N/A

FOR LTR - VINE & SUNSET - 2% ADDED.xls