



# City of Los Angeles

Department of City Planning • Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## DRAFT ENVIRONMENTAL IMPACT REPORT SOUTH LOS ANGELES COMMUNITY PLAN AREA

Volume I of 2

Sections I - VI

### Oak Village Residences Project

Case Number: ENV-2005-8476-EIR  
State Clearinghouse Number: 2009031003

**Project Location:** 902 and 910 Washington Boulevard, 1909, 1911, 1913, 1915, 1917, 1919, 1923, 1929, 1933, and 1939 Oak Street, and 903, 907, 911, 913, 917, 919 20<sup>th</sup> Street, Los Angeles, California, 90015

**Council District:** 1

**Project Description:** The Project includes the demolition of the existing 12,335-square-foot commercial structure and approximately 114-space parking lot and construction of an approximately 182,575-square-foot, 142-unit residential townhome/condominium in 6 separate structures, with heights ranging from 65.5 feet to 35 feet above ground surface. Two subterranean levels of parking would provide a total of 320 parking spaces. In order to allow for the Project, the Applicant seeks to rezone the portions of the Project site currently zoned P-1-HPOZ and R3-1-HPOZ to CM-1-HPOZ (the zoning for the portion of the site currently zoned CM-1-HPOZ would be retained). In addition, the Project Applicant requests a 28 percent density bonus pursuant to SB 1818 to provide 142 dwelling units including 11 very-low-income units, in lieu of the maximum permitted 111 units, with one incentive to permit a maximum 3:1 floor area ratio in lieu of the maximum 1.5:1 in the proposed CM-1-HPOZ zone. Current access to the existing Project site is provided via three driveways on Oak Street, which borders the Project site to the east. Access to the Project would be provided via one driveway on Oak Street, along the easterly property frontage.

#### APPLICANT:

Anastasi Development Company  
511 Torrance Boulevard  
Redondo Beach, CA 90277

#### PREPARED BY:

CAJA Environmental Services  
11990 San Vicente Boulevard  
Los Angeles, CA 90049

#### ON BEHALF OF:

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

August 2013

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## I. INTRODUCTION/SUMMARY

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### A. INTRODUCTION

The subject of this Environmental Impact Report (EIR) is the proposed Oak Village Residences Project (the “Project”). A detailed description of the Project is included in Section III (Project Description) of this EIR.

Because the Project will require approval of certain discretionary actions by the City of Los Angeles (the “City”), the Project is subject to the California Environmental Quality Act (CEQA), for which the City is the designated Lead Agency. The Department of City Planning administers the process by which environmental documents for projects are prepared and reviewed. On the basis of these procedures, it was determined that the Project may have a significant effect on the environment, and an EIR should be prepared.

As described in Sections 15121 and 15362 of the *CEQA Guidelines*, an EIR is an informational document that will inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to a project. The purpose of this EIR, therefore, is to focus the discussion on those potential effects on the environment of the Project that the Lead Agency has determined are or may be significant. In addition, feasible mitigation measures are required, when applicable, that could reduce or avoid significant impacts.

This EIR was prepared in accordance with Section 15151 of the *CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR would summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.*

### Environmental Review Process

In compliance with Section 21080.4 of the California Public Resources Code, a Notice of Preparation (NOP) was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties on February 26, 2009. The NOP was circulated for 32 days with the comment period ending March 30, 2009. A public scoping meeting was held on March 10, 2009 at Norwood Elementary School. A copy of the NOP and comments submitted in response to the NOP are included in Appendix I to this EIR.



The Draft EIR will be circulated for 45 days review and comment by the public and other interested parties, agencies, and organizations. Public hearings on approval/denial of the Project will be held after the review period and the preparation of the Final EIR. Notice of the time and location will be published prior to the public hearing date. All comments or questions about the Draft EIR should be addressed to the following:

Emily Dwyer  
Environmental Review Section  
Department of City Planning  
200 N. Spring Street, City Hall Room 750  
Los Angeles, CA 90012

Following public review of the Draft EIR, a Final EIR will be prepared in response to comments received during the public review period. The Final EIR will be available for public review prior to its certification by the City.

### **Organization of the Draft EIR**

The Draft EIR is organized in seven sections as follows:

Section I (Introduction/Summary): This section provides an introduction to the environmental review process and a summary of the Project description, alternatives, environmental impacts, and mitigation measures.

Section II (Project Description): A complete description of the Proposed Project including Project location, Project site characteristics, Project characteristics, Project objectives, and required discretionary actions is presented.

Section III (Environmental Setting): An overview of the environmental setting of the Proposed Project is provided including a description of existing and surrounding land uses, and a list of related projects.

Section IV (Environmental Impact Analysis): The Environmental Impact Analysis section is the primary focus of this EIR. Separate discussions are provided to address the potential environmental effects of the Proposed Project. Each environmental issue contains a discussion of existing conditions, an assessment and discussion of the significance of impacts associated with the Proposed Project, mitigation measures, cumulative impacts, and level of impact significance after mitigation.

Section V (General Impact Categories): This section provides a summary of significant and unavoidable impacts of the Proposed Project, a discussion of potential growth inducing effects, and an explanation of the significant irreversible environmental changes.

Section VI (Alternatives to the Proposed Project): This section includes an analysis of a range of reasonable alternatives to the Proposed Project. The range of alternatives selected is based on their ability

to both feasibly attain most of the basic objectives of the Project and avoid or substantially lessen any of the significant effects of the Project.

Section VII (Preparers of the EIR): This section presents a list of City, County, and other agencies and consultant team members that contributed to the preparation of the EIR.

Section VIII (Acronyms and Abbreviations): This section includes a list of acronyms and abbreviations used throughout the EIR.

## **B. SUMMARY**

The purpose of the Executive Summary is to provide the reader with a clear and simple description of the Project and its potential environmental impacts. Section 15123 of the *CEQA Guidelines* requires that the summary identify each significant impact, its proposed mitigation measures and the alternatives that would minimize or avoid that impact. The summary is also required to identify areas of controversy known to the lead agency, including issues raised by agencies and the public, as well as the issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects. This section focuses on the major areas of the Project that are important to decision-makers and uses non-technical language to promote understanding.

### **Summary of the Project**

The Project site currently comprises ten separate parcels, totaling approximately 2.03-acres (88,586 square feet) and is fully developed with a commercial catering facility and an associated surface parking lot. The Project includes the demolition of the existing commercial structure and construction of an approximately 182,575-square-foot, 142-unit residential townhome/condominium development. The Project consists of six separate buildings, two condominium buildings and four duplex townhome buildings. The condominium buildings would be six stories tall, approximately 65 feet at their highest point. The three-story (approximately 35 feet in height) townhomes would be located on the western portion of the Project site along 20<sup>th</sup> Street. The townhomes would all be four-bedroom units. The 134 condominium units would comprise 32 one-bedroom units, 76 two-bedroom units, 24 three-bedroom units, and two four-bedroom units. Two subterranean levels of parking would provide a total of 320 parking spaces. Access for pedestrians would be from Washington Boulevard, Oak Street and 20<sup>th</sup> Street, with vehicle access to the subterranean parking, for both residents and visitors, provided along Oak Street.

The Project site is zoned [Q]C2-2-HPOZ (Commercial Zone), P-1-HPOZ (Automobile Parking Zone), and R3-1-HPOZ (Multi-Family Residential). The land use designation for the Project site is Commercial Manufacturing. In order to allow for the Project, the Applicant seeks to rezone the portions of the Project site currently zoned P-1-HPOZ and R3-1-HPOZ to CM-1-HPOZ. In addition, the Project Applicant requests a 28 percent density bonus pursuant to SB 1818 to provide 142 dwelling units including 11 very-low-income units, in lieu of the maximum permitted 111 units, with one incentive to permit a maximum 3:1 floor area ratio in lieu of the maximum 1.5:1 in the proposed CM-1-HPOZ zone.

## **C. TOPICS OF KNOWN CONCERN**

Based on public comments in response to the NOP and a review of environmental issues by the Department of City Planning, this EIR analyzes the following impact areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
  - Fire
  - Police
  - Schools
  - Parks
  - Libraries
- Traffic, Transportation, and Parking
- Utilities/Service systems
  - Sewer
  - Water
  - Solid Waste
  - Energy

## **D. AREAS OF CONTROVERSY**

The primary issue areas raised in comments submitted to the Department of City Planning in response to the NOP and by speakers at the public scoping meeting include (but are not limited to) the following:

- Aesthetics
- Historic Preservation
- Traffic
- Noise

**E. ISSUES TO BE RESOLVED**

Issues to be resolved include whether or how to mitigate potentially significant environmental impacts of the Proposed Project, and whether one of the alternatives should be approved rather than the Proposed Project.

**F. ALTERNATIVES TO THE PROPOSED PROJECT**

This EIR considers a range of reasonable alternatives to the Project to provide informed decision-making in accordance with Section 15126(d) of the *CEQA Guidelines*. The alternatives analyzed in this EIR include: A) No Project; B) Reduced Density; C) Alternate Land Use Mix; and D) Retail/Office Development. For further discussion of these alternatives, refer to Section VI (Alternatives to the Proposed Project) of this EIR. Based on the analysis in Section VI, Alternative B was selected as the environmentally superior alternative.

**G. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Table I-1 includes: 1) a summary of the significant environmental impacts associated with the Project; 2) mitigation measures identified in the EIR to reduce or avoid the environmental impacts; and 3) conclusions regarding the level of impact significance after mitigation for each of the significant impacts identified in the EIR.

**Table I-1  
Summary of the Project's Significant Impacts**

Significant Impacts	Mitigation Measures	Level of Significance After Mitigation
<p><b><u>Air Quality</u></b>  <i>Construction Emissions</i>            The peak daily emissions generated during the Project's site preparation, grading, and excavation phase would exceed the regional emission threshold recommended by the SCAQMD for NO<sub>x</sub> largely due to off-road diesel-powered equipment and soil hauling. Therefore, regional air quality impacts associated with the Project-related construction emissions would be considered significant and unavoidable.</p>	<p>C-1: All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions.</p> <p>C-2: 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.</p> <p>C-3: All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.</p> <p>C-4: All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.</p> <p>C-5: All clearing, grading, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 miles per hour), so as to prevent excessive amounts of dust.</p> <p>C-6: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.</p>	<p>Significant and Unavoidable</p>
<p><b><u>Noise</u></b>  <i>Construction Noise</i>            During the Project's construction phase, construction-related noise levels could exceed the significance thresholds. Therefore, impacts related to construction noise would be significant.</p>	<p>H-1: The project shall comply with the City of Los Angeles Noise Ordinance No. 144331 and 161574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.</p> <p>H-2: Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, and prohibited on all</p>	<p>Significant and Unavoidable</p>

**Table I-1**  
**Summary of the Project's Significant Impacts**

Significant Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>Sundays and federal holidays.</p> <p>H-3: Noise and groundborne vibration construction activities whose specific location on the Project 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- and vibration-sensitive land uses.</p> <p>H-4: Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p>H-5: The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers.</p> <p>H-6: The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>H-7: A ½-inch thick plywood barrier extending ten-feet high shall be erected around the project site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors to the maximum extent feasible during construction.</p> <p>H-8: 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.</p> <p>H-9: The project shall comply with the City of Los Angeles</p>	

**Table I-1**  
**Summary of the Project's Significant Impacts**

Significant Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.</p> <p>H-10: Two weeks prior to the commencement of construction at the Project site, notification must be provided to the immediate surrounding off-site residential and school uses that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.</p>	
<p><b><u>Public Services</u></b>  <i>Library Services</i>  The Project would result in an increased demand for library services. The Project's contribution to a cumulative demand for library services would be considerable.</p>	<p>J-11: The Project Applicant shall pay a mitigation fee of \$200 per capita based on the projected population generated as a result of the buildout of the proposed development. The funds will be used by LAPL for staff, books, computers, and other library materials.</p>	<p>Less Than Significant</p>
<p><b><u>Transportation/Traffic</u></b>  <i>Bicycle, Pedestrian, and Vehicular Safety</i>  Traffic generated by the Project could affect bicycle, pedestrian,</p>	<p>K-1: Prior to construction, the Project Applicant shall contact LAUSD Transportation Branch at (323) 342-1400 regarding potential impact to school bus routes.</p>	<p>Less Than Significant</p>

**Table I-1**  
**Summary of the Project's Significant Impacts**

Significant Impacts	Mitigation Measures	Level of Significance After Mitigation
and vehicular safety in the vicinity of the Project site. Without implementation of safety measures, impacts could be potentially significant.	<p>K-2: Unrestricted access for school buses shall be maintained during all phases of Project construction.</p> <p>K-3: All construction workers shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.</p> <p>K-4: The Project Applicant shall not interfere with passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.</p> <p>K-5: The Project Applicant shall maintain safe and convenient pedestrian routes to LAUSD schools.</p> <p>K-6: The Project Applicant shall maintain ongoing communication with school administration at Norwood Street Elementary and Downtown Value Schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school could be affected.</p> <p>K-7: During the Project's construction phase, the Project Applicant shall not haul past affected school sites, except when school is not in session. If that is infeasible, the Project Applicant shall not haul during school arrival and dismissal times.</p> <p>K-8: The Project Applicant shall not stage or park construction-related vehicles, including worker-transport vehicles, adjacent to school sites.</p> <p>K-9: The Project Applicant shall provide crossing guards when</p>	



**Table I-1**  
**Summary of the Project's Significant Impacts**

Significant Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>safety of students could be compromised by construction-related activities at impacted school crossings.</p> <p>K-10: The Project Applicant shall install barriers and/or fencing around the Project site to secure construction equipment and the site to prevent trespassing, vandalism, and attractive nuisances.</p> <p>K-11: During the Project's construction phase, the Project Applicant shall provide security patrols of the Project site to minimize trespassing, vandalism, and short-cut attractions.</p> <p>K-12: During the Project's construction phase, the Project Applicant shall identify pedestrian and bicycle routes near the Project site and plan for safe detour of these routes.</p>	

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## II. ENVIRONMENTAL SETTING

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### A. OVERVIEW OF ENVIRONMENTAL SETTING

This section provides a brief overview of the Project site's regional and local settings. Additional descriptions of the environmental setting as it relates to each of the environmental issues analyzed in this EIR are included in the environmental setting discussions contained within Sections IV.A through IV.K. A list of related projects, which is used as the primary basis for the discussion of cumulative impacts in Section IV (Environmental Impact Analysis), is also provided.

#### **Regional Setting**

The Project site is located in the South Los Angeles Community Plan area of the City of Los Angeles (the "City"). The South Los Angeles Community Plan area is located approximately three miles southwest of Downtown Los Angeles and encompasses approximately 15.4 square miles of land area. The South Los Angeles Community Plan area is generally bound on the north by Pico Boulevard, by Arlington and Van Ness Avenues to the west, Figueroa Street and Broadway to the east, and an irregular boundary terminated by 120<sup>th</sup> Street and the County of Los Angeles form the southern boundary to the south (refer to Figures II-1 and II-2). Regional access to the Project site is provided by State Route 110 (SR 110) and Interstate 10 (I-10). Major north-south streets serving the area containing the Project site include South Hoover Street and South Main Street. Primary east-west access to the project area is provided by Washington Boulevard, West Adams Boulevard, and Venice Boulevard.

#### **Local Setting**

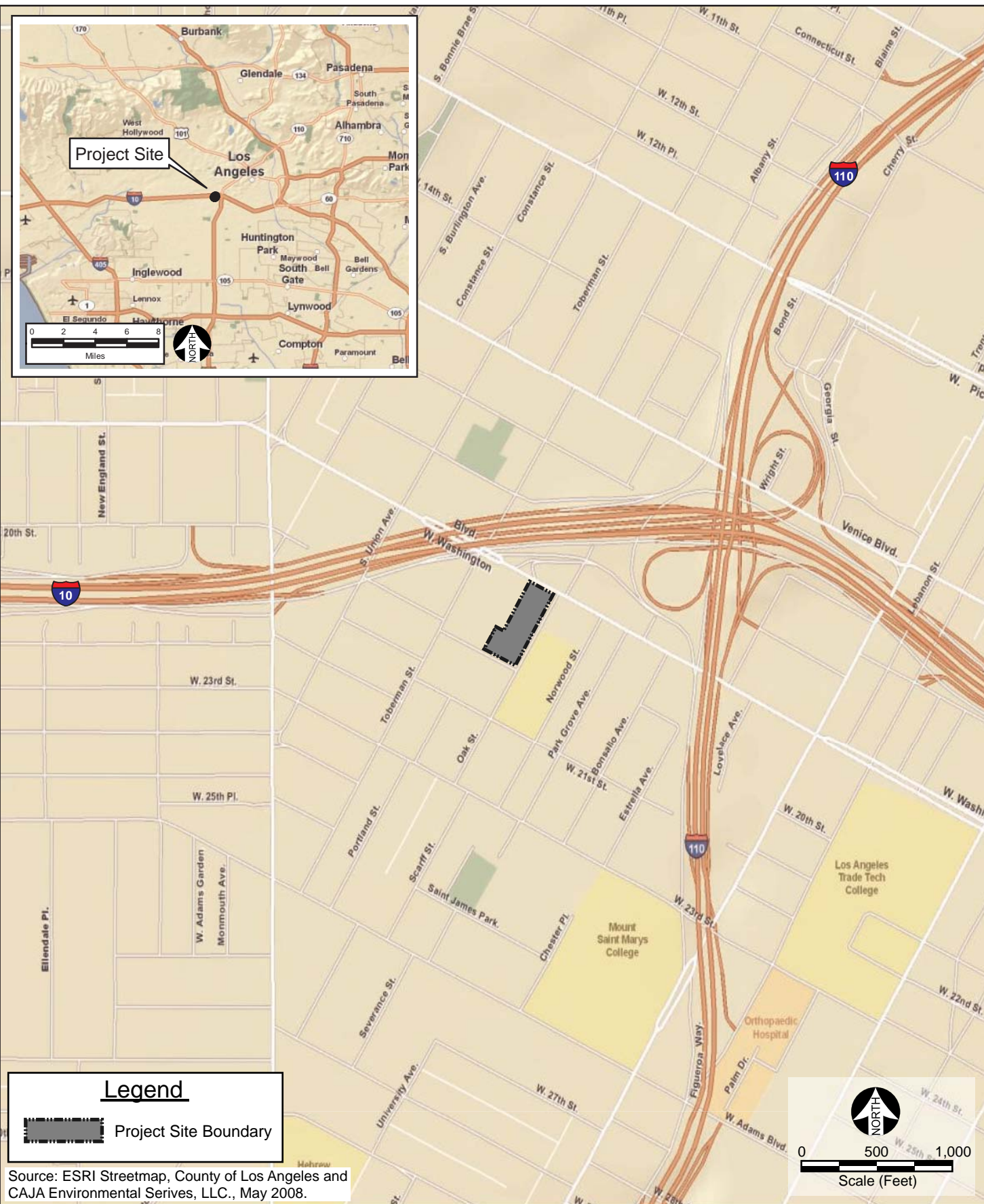
##### ***Project Site***

The Project site comprises 10 parcels (approximately 2.03 acres), located at 902 and 910 Washington Boulevard, 1909, 1911, 1913, 1915, 1917, 1919, 1923, 1929, 1933, and 1939 Oak Street, and 903, 907, 911, 913, 917, 919 20<sup>th</sup> Street. All parcels of the Project site fall under Assessor's Parcel Number (APN) 5124016029. As shown on Figure II-2, the Project site is bounded by Washington Boulevard to the north, Oak Street to the east, 20<sup>th</sup> Street to the south, and a commercial building and surface parking lot to the west. Based on information submitted to the City during the Notice of Preparation (NOP) circulation period, it appears that in 1922 the Washington Boulevard frontage of the Project site was occupied by a two-story, U-shaped, 22-unit multiple-family structure known as the Hartmann Apartments, and the Oak Street frontage was occupied by four large two-story single-family structures and a courtyard complex of six buildings, the remaining lots contained a total of seven single-family homes.<sup>1</sup> The total number of units on the Project site in 1922 is unknown.

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<sup>1</sup> Jim Childs, Chair, Adams Dockweiler Heritage Organizing Committee, Notice of Preparation Response Letter, March 30, 2009

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Views of the Project site are shown on Figures II-3 and II-4. The Project site is currently used as a commercial catering facility and is developed with a one-story, brick building of approximately 12,335 square feet (built in 1978) that fronts Washington Boulevard and a paved surface parking lot that extends south behind the building to the end of the Project site at 20<sup>th</sup> Street. The Project site is located in the University Park Historic Preservation Overlay Zone (HPOZ) and formerly contained a historic residential structure that was destroyed by fire in 1978. There are 11 street trees (i.e., Indian Laurel Figs [*Ficus microcarpa nitida*]) located outside of the Project site. The topography of the Project site is relatively flat.

Access to the existing Project site is provided via three driveways on Oak Street, which borders the Project site to the east. The central driveway provides vehicular access to the site and existing surface parking areas, while the northerly and southerly site driveways are presently blocked by equipment situated within the surface parking areas. The existing Project site access driveway on Oak Street (i.e., the central driveway) accommodates full access turning movements (i.e., left-turn and right-turn ingress and egress turning movements).

The brick building on the Project site has no setback from the Washington Boulevard sidewalk and has a strictly utilitarian appearance. A concrete block wall (approximately eight feet in height) encloses the parking/service area along Oak and 20<sup>th</sup> Streets. A driveway provides truck access to the facility from Oak Street, at about mid block. South of this driveway, a mural has been painted on the peripheral wall. A freestanding ice-making unit is located in the center of the parking area.

As previously indicated, the Project site is bounded by 20<sup>th</sup> Street on its south side. The concrete wall on the south side is topped by tightly rolled razor wire. A landscape strip, approximately eight feet in width, lies between the peripheral wall and the sidewalk. Mature street trees along both Oak Street and 20<sup>th</sup> Street have put out horizontal roots that, over time, have broken and raised the adjacent sidewalk.

Views of the interior of the catering truck service and parking area are restricted to what can be seen from the access driveway and above the surrounding concrete block walls along Oak and 20<sup>th</sup> Streets. However, the catering trucks are taller than the walls and their tops are visible from outside when they are parked next to the walls. Also visible above the surrounding walls are the tall night lighting poles in the parking/service (approximately 30 feet in height) each of which bears multiple, unshielded fixtures. Additionally, a partial view into the rear of the Project site is provided by a low wall located at the southwest corner of the site.



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**View 1:** View looking east toward the 1-story brick building on the Project site from the sidewalk on south side of Washington Boulevard.



**View 2:** View looking west from east side of Oak Street into the interior of the Project site's parking/service area - showing entrance driveway, catering trucks, free-standing structure, and street vendors.



**View 3:** View looking north along Oak Street from its intersection with 20th Street at the southern end of the Project site. Norwood Street School is located just off the right side of the photograph.

Source: CAJA Environmental Services LLC., 2012.

**Figure II-3**  
Views of the Project Site  
Views 1-3

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**View 4:** View looking east along 20th Street sidewalk at rear of Project site, unmaintained landscape strip, rear wall with razor wire, and overhead utility lines.



**View 5:** View looking west from east side of Oak Street toward Project site. The top of catering trucks and high intensity night lighting poles are visible above the perimeter wall.

Source: CAJA Environmental Services LLC., 2008.

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### ***Surrounding Land Uses***

Views of the areas surrounding the Project site are shown on Figures II-5 through II-10. The area immediately surrounding the Project site is developed with a mix of single- and multi-family residential, commercial, and institutional buildings with associated surface parking lots of varying architectural style and dates of construction. Dominating the area is the I-10, which in the Project vicinity, consists of four parallel bridges that cross Washington Boulevard diagonally just to the west of the Project site. Perpetually in darkness from the bridges' shadows, the area under the freeway on the north side of Washington Boulevard is used for truck storage. On the south side of the I-10, the area under the bridges is occupied by a self-serve storage facility. In addition to an access ramp to the I-10, the north side of Washington Boulevard, to the east of the bridges, supports a mix of commercial and light industrial uses including a one-story building that houses blue printing/graphics businesses, an unoccupied church, and the historic Casa Camino Real Building, a partially vacant five-story mixed-use building. Other uses on Washington Boulevard include a mix of low- to mid-height retail and commercial buildings.

To the east of the Project site, across Oak Street at its intersection with Washington Boulevard, is Giroux Glass, an industrial glass manufacturing and installation plant. Further to the east beyond Giroux Glass is a Groman Mortuary. South of Giroux Glass and directly across Oak Street from the Project site are two schools, a USC Continuing Education facility and the Norwood Street Elementary School. Norwood Street Elementary has entrances on both Norwood Street and on 21<sup>st</sup> Street at its corner with Oak Street and a playground that faces Norwood Street.

To the west of the Project site is an adjacent two-story commercial building, constructed in the late 1980s. A parking lot that serves as a loading and staging area for this two-story commercial building is located adjacent to the southwest corner of the Project site. To the west of this two-story commercial building at the corner of Toberman Street and Washington Boulevard is a 40-foot-tall brick building currently occupied by the Downtown Value School, an alternative day school. Directly across Toberman Street from the Downtown Value School is a self-serve storage facility, which is secured by chain link fencing and razor wire.

As previously indicated, the Project site is bounded on the south by 20<sup>th</sup> Street. The south side of 20<sup>th</sup> Street between Oak Street on the east and Toberman Street on the west is lined with a surface parking lot that serves Norwood Street School and a row of large single-family Craftsman-style homes constructed in the early 20<sup>th</sup> century, most of which appear to have been recently renovated. To the west of Toberman Street, land uses along 20<sup>th</sup> Street are characterized by a mix of one- and two-story single- and multi-family residences. Toberman Street, south of Washington Boulevard and the Downtown Value School, is a narrow residential street consisting of a mix of one- and two-story, single- and multi-family residences.

Land uses located south and east of the Project site along 21<sup>st</sup> Street and Norwood Street include more single- and multi-family residences.

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**View 1:** View looking west under Santa Monica Freeway bridges.



**View 2:** View from Project site looking north across Washington Boulevard at nearby commercial building with Santa Monica Freeway in background.



**View 3:** View from Project site looking northeast across Washington Boulevard at nearby unoccupied church and historic Casa Camino Real Building.

Source: CAJA Environmental Services LLC., 2008.



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**View 4:** View from corner of Oak Street and Washington Boulevard looking southeast at Giroux Glass.



**View 5:** View from corner of Norwood Street and Washington Boulevard at Gorman Mortuary.



**View 6:** View looking west across Norwood Street at Norwood Street School.

Source: CAJA Environmental Services LLC., 2008.

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**View 7:** View from Washington Boulevard sidewalk looking south at 2-story commercial building adjacent to west side of Project site.



**View 8:** View from 20th Street sidewalk looking north at parking lot/loading area of 2-story commercial building adjacent to Project site. On-site catering truck are visible at right behind the low wall.



**View 9:** View from corner of Toberman Street and Washington Boulevard looking east at Downtown Value School.

Source: CAJA Environmental Services LLC., 2008.

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**View 10:** View from corner of Toberman Street looking southeast along 20th Street at row of single-family Craftman homes across street from Project site.



**View 11:** View from corner of Toberman Street looking southwest along 20th Street at mix of one-and two-story single and multi-family residences.



**View 12:** View looking south along Toberman Street toward 20th Street.

Source: CAJA Environmental Services LLC., 2008.

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**View 13:** View looking southeast on Toberman Street, south of Washington Boulevard, at single-family residences.



**View 14:** View looking at Norwood Street School at corner of Oak and 21st Street.



**View 15:** View looking west at Norwood Street School playground from Norwood Street.

Source: CAJA Environmental Services LLC., 2008.

Figure II-9  
Views of Surrounding Area  
Views 13-15



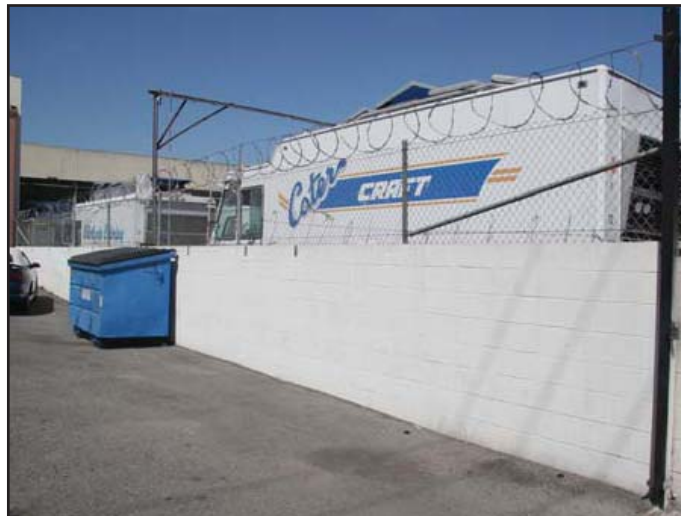
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**View 16:** View looking southeast on Norwood Street at single-family and multiple-family residences in the neighborhood.



**View 17:** View looking northeast along Washington Boulevard at nearby land uses.



**View 18:** View looking into southern portion of Project site, over low-concrete block wall, from 20th Street.

Source: CAJA Environmental Services LLC., 2008.

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### ***University Park Historic Preservation Overlay Zone***

The Project site is located in the University Park Historic Preservation Overlay Zone (HPOZ). As stated in the Historic Resource Report for the Project (included in Appendix IV.D to this EIR), the overlay zone is geographically located within the South Los Angeles Community Plan area, located entirely south of the I-10, which serves as the neighborhood's northern boundary, and spans from Vermont Avenue on the west to Estrella Avenue on the east, where it is bounded by the SR 110. Adams Boulevard and 24<sup>th</sup> Street serve as the HPOZ's southern boundary.

The University Park HPOZ neighborhood dates back to the 1880's when the University of Southern California (USC) was established in the neighborhood.<sup>2</sup> During this period many of the City's wealthy relocated to this suburban neighborhood and constructed large residences. The construction dates and styles of the residences located in the overlay zone vary. The styles represented include: Queen Anne, Craftsman, Spanish Colonial Revival, and American Colonial Revival. The dates of construction range from 1887 to 1924. This neighborhood contains one of the highest numbers of Historic-Cultural Monuments within the city. Although the Project is located within the HPOZ, none of the ten parcels within the Project site are contributing elements. However, three parcels located within the same block as the Project site are classified as contributing elements. These include: the school at the corner of Washington Boulevard and Toberman Street, a multi-family residence that fronts Toberman Street, and a single-family residence that faces 20<sup>th</sup> Street. Many of the parcels within the vicinity of the Project site are classified as contributing elements, namely properties located on 20<sup>th</sup> Street, Toberman Street, Oak Street, Norwood Street, and 21<sup>st</sup> Street.

The University Park HPOZ Preservation Plan provides a detailed history of University Park, the introduction of which is excerpted as follows:

*University Park within its boundaries offers a unique insight of the history of Los Angeles from its Pueblo period, through its days as agricultural land, to one of the earliest subdivisions the Hoover Tract of 1975 [sic], and subsequent subdivisions by the entrepreneurs of the boom of the eighties, the development of elite enclaves, and finally multiple dwellings to provide housing adjacent to a vibrant downtown. The University Park built form provides a unique chronicle of the development of the City of Los Angeles and the interesting mix of people and social classes that provide a glimpse into our dynamic history as Angelinos. In 1781 the pueblo that later became the City of Los Angeles was founded on the banks of the Los Angeles River by 44 Spanish settlers of mixed ancestry. The pueblo grant included the four square leagues (36 square miles) surrounding a central plaza. The approximate boundaries of the original pueblo are Hoover Street, Fountain Avenue, a line continued east from Exposition Boulevard, and a line continued north from Indiana Street. The intersection of Hoover and Union shows the contrast between the city's rectangular*

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<sup>2</sup> [www.preservation.lacity.org/hpoz/la](http://www.preservation.lacity.org/hpoz/la)

*grid determined from a compass base line and the Spanish pueblo land grant boundaries that required NE/SW orientation...*

*University Park contains one of the best, and most intact, groupings within Los Angeles of residential architecture constructed between 1887 and 1930, significant examples of which are the scarcely known works of major turn-of-the-century architects and builders. The St. James Park Subdivision portion of the district is a much noted and rare example in Los Angeles of nineteenth-century private residential park planning. University Park was home to significant numbers of persons who assumed prominent roles in the professional, economic, and social life of Southern California between 1890 and 1925.*

*University Park shows the full range of late nineteenth and turn-of-the-century domestic architecture in Los Angeles, including upper middle class two-story Italianate Style homes from the late 1880's; charming middle-class Victorian cottages with unusual decorative features from the 1890's; 1 and 1-1/2-story Queen Anne cottages/two-story Queen Annes from the early 1890's. During the late 1890's and opening years of this century upper-middle and upper-class families, such as the Creightons and Stearns commissioned mansions around the edge of St. James Park in American Colonial and Classical Revival styles. University Park district contains significant numbers of architect-designed buildings; many of those identified representing the most distinguished firms working in the Los Angeles area during the 1890's and first decade of the twentieth century. This is logical given both the prestigious tone of much of West Adams before and after the turn-of-the-century, and the elite middle to upper-middle class economic and social standing of the majority of its residents.<sup>3</sup>*

### **Mortuary Row**

The section of Washington Boulevard in the vicinity of the Project site has historically been known as "Mortuary Row" and is reputedly eligible for a National Register Historic District designation. The nickname comes from its concentration of mortuaries. The University Park HPOZ Preservation Plan provides the following description of Mortuary Row:

*In addition to local commercial buildings, along Washington Boulevard a series of buildings were developed as funeral homes. Mortuary Row consisted of over two dozen funeral parlors clustered together on a half-mile strip that provided services to Los Angeles residents for over thirty years. That so many competing business entities operated in such close proximity was the result of several factors: a zoning philosophy of the time that called for "like" activities to be allowed in certain areas, the importance of having the socially right address on a prestigious Boulevard, accessibility to resources such as Rosedale cemetery, the Alameda Rail Corridor, and the Adams Boulevard Churches. Development of Mortuary Row occurred beginning in the 1920's and*

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<sup>3</sup> University Park HPOZ Preservation Plan, July 14, 2005, pages 6 and 7.

*continued to the 1950's when the area was ripped apart by the construction of the Santa Monica Freeway Project. The influence and importance of "Mortuary Row" is recognized by the magnitude of its influence on the City. The 1930 Directories of the period list 19 mortuaries, eight of which or 42% of which were on the "Row," reflecting the tremendous influence. By the 1940's, with the dramatic growth in population of the City, 24 of 70 mortuaries or 33% were on the row, only a half-mile strip. The Mortuary buildings represent the work of pre-eminent Southern California architects and their facades continue to generate a serene dignity. Mortuary Row is linked to a pattern of events that define a development style of building related to the mortuary business; the developers of Mortuary Row were leading businessmen of their era, and the mortuaries create a property type with unifying architectural features, designed by preeminent architects that relate to their historic context. Further, many of the remaining mortuaries have been adaptively reused while retaining their character defining features.<sup>4</sup>*

### **20<sup>th</sup> Street Historic District**

The 20<sup>th</sup> Street Historic District consists of a row of bungalow and craftsman style houses situated on the south side of the 900 block of 20<sup>th</sup> Street and located directly across the street from the Project site. The houses were designed by W. Wayman Watts and built in the early part of the 20<sup>th</sup> Century. The district was added to the National Register of Historic Places in 1991.

### **Land Use and Zoning Regulations**

The Project site is located within the South Los Angeles Community Plan Area, which designates the entire site as "Commercial Manufacturing."

Currently, the Project site is zoned under the City of Los Angeles Municipal Code (LAMC) as [Q]C2-2-HOPZ, R3-1-HPOZ, and P-1-HPOZ.

- **Commercial Zone [Q]C2-2-HPOZ** - The "[Q]" indicates that residential uses at the density allowed under R4 and R5 zones are prohibited. The "C2" zoning represents the Project site's Commercial classification and permits most uses allowed under the "C1" and "C1.5" zoning, including local retail stores, offices, hotels, hospitals, museums, service stations and garages, churches, schools, auto sales, and certain (R3 and R4) residential uses. The "2" represents "Height District 2," which does not specify maximum heights for development in any zone other than CR, but does establish a maximum floor area ratio (FAR) of 6:1. The "HPOZ" indicates that the Project site is located within a Historic Preservation Overlay Zone and is subject to the requirements of the University Park Historic Preservation Overlay Zone.

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<sup>4</sup> University Park HPOZ Preservation Plan, July 14, 2005, page 13.

- **Multi-Family Residential R3-1-HPOZ** - The “R3” represents the Project site’s Multi-Family Residential land use designation and permits most uses in the R1 and R2 zones, including one- and two-family dwellings and home occupations, plus the addition of apartment and boarding houses, multiple and group dwellings, senior independent and assisted living care housing, and small child care facilities. The “1” represents “Height District 1,” which does not specify maximum heights for development but establishes a maximum FAR of 1.5:1. Again, the “HPOZ” indicates the Project site is subject to the requirements of the University Park Historic Preservation Overlay Zone.
- **Automobile Parking Zone P-1-HPOZ** - The “P” represents the Project site’s Automobile Parking Zone land use designation and permits both surface and underground parking facilities. The “1” represents “Height District 1,” which does not specify maximum heights for development but establishes a maximum floor area ratio (FAR) of 1.5:1. Again, the “HPOZ” indicates the Project site is subject to the requirements of the University Park Historic Preservation Overlay Zone.

The Project site is located in a mapped Methane Buffer Area. Division 71 of the Los Angeles Building Code (LAMC) sets forth the City’s minimum requirements for control of methane intrusion emanating from geologic formations. All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone must comply with these requirements and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards provide information describing the installation procedures, design parameters and test protocols for the methane gas mitigation systems.

## **B. RELATED PROJECTS**

Section 15130 of the *CEQA Guidelines* stipulates that an environmental impact report (EIR) must consider the significant environmental effects of a Project as well as “cumulative impacts.” A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts (*CEQA Guidelines* Section 15355). As stated in the *CEQA Guidelines* Section 15130(a)[1], the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the project evaluated in the EIR.

All projects that are proposed (i.e., with pending applications), recently approved, under construction, or otherwise reasonably foreseeable that could produce a cumulative impact on the local environment when considered in conjunction with a Project are required to be evaluated in an EIR. These projects can include, if necessary, projects outside of the control of the lead agency. If a concise list of related projects is not available, cumulative impacts may be analyzed using the regional or area-wide growth projections contained in an adopted or certified general plan or related planning document.

In this EIR, cumulative impact analyses are provided for each environmental issue discussed in Section IV (Environmental Impact Analysis), and can be found in each respective subsection (e.g., Air Quality, Transportation/Traffic, etc.). Table II-1 lists 49 reasonably foreseeable related projects within the Project

area that were considered in the cumulative impact analyses. In addition to these related projects, some of the cumulative analyses in this EIR (such as in Section IV.I [Transportation/Traffic]) consider a regional growth factor.

**Table II-1  
List of Related Projects<sup>1</sup>**

Map No.	File/Project No.	Project Name Location	Land Use	Size	Status
1	2003-CEN-0179	LA Trade Tech College 400 Washington Boulevard	Technical College	6,300 students <sup>2</sup>	Under Construction
2	EAF 2004-6903	662 Lucas Avenue	Condominium	311 DU	Proposed
3	2008-CEN-4671	1340 Olive Street	Condominium	150 DU	Proposed
4	2008-CEN-4651	820 Hoover Street	Condominium Retail (Less Existing Office)	32 DU 4,500 GSF (1,435 GSF)	Proposed
5	2005-CEN-1907	Herald Examiner 146 E. 11 <sup>th</sup> Street	Apartments Office Retail Condominium	20 DU 32,670 GSF 37,600 GLSF 565 DU	Proposed
6	2005-CEN-4297	860 Olive Street	Phase I: Apartment Retail Restaurant Phase II: Condominium Retail	98 DU 11,400 GLSF 6,000 GSF 255 DU 7,500 GLSF	Proposed
7	2007-CEN-3970	609 8 <sup>th</sup> Street	Condominium Hotel Retail Restaurant	225 DU 200 Rooms 30,000 GLSF 32,000 GSF	Proposed
8	2006-CEN-2870	1027 Wilshire Boulevard	Condominium Retail	402 DU 4,728 GLSF	Proposed
9	2006-CEN-3169	1135 7 <sup>th</sup> Street	Condominium Retail	130 DU 7,037 GLSF	Proposed
10	2006-CEN-3099	939 Flower Street	School Expansion Apartment	95,700 GSF 112 DU	Proposed
11	2006-CEN-2885	1111 Wilshire Boulevard	Condominium Retail	420 DU 40,000 GLSF	Proposed
12	2006-CEN-2867	315 9 <sup>th</sup> Street	Condominium Retail	210 DU 9,000 GSF	Proposed
13	2006-CEN-3090	1360 and 1500 Figueroa Street	Condominium	622 DU	Proposed
14	2006-CEN-3134	2400 Flower Street	Apartment Retail	1,500 DU 40,000 GLSF	Proposed
15	2006-CEN-3487	1257 7 <sup>th</sup> Street	Condominium Retail	186 DU 6,200 GLSF	Proposed
16	2006-CEN-3242	1133 Hope Street	Condominium Restaurant	159 DU 6,827 GSF	Under Construction



**Table II-1  
List of Related Projects<sup>1</sup>**

<b>Map No.</b>	<b>File/Project No.</b>	<b>Project Name Location</b>	<b>Land Use</b>	<b>Size</b>	<b>Status</b>
17	2006-CEN-3596	745 S. Spring Street	Condominium Retail	247 DU 10,675 GLSF	Proposed
18	2006-CEN-3912	1150 Grand Avenue	Condominium Retail Restaurant	351 DU 12,500 GLSF 12,500 GSF	Proposed
19	2007-CEN-3969	1115 Hill Street	Condominium Retail	172 DU 6,850 GSF	Proposed
20	2008-CEN-4655	2789 Olympic Boulevard	Medical Office Retail	46,771 GSF	Proposed
21		1501 Wilshire Boulevard	Apartment Retail Restaurant	218 DU 6,000 GLSF 4,450 GSF	Proposed
22	2007-CEN-4520	1136 6 <sup>th</sup> Street	Apartment Retail	725 DU 39,999 GLSF	Proposed
23	2007-CEN-4553	2455 S. Figueroa Street	Apartment	145 DU	Proposed
24	ENV 2011-0585-EIR <sup>3</sup>	Venice Boulevard/SR 110	Convention Center	72,000 seats	Proposed
25	USC Development Plan <sup>4</sup>	USC Campus	University Retail Cinema Restaurant Supermarket Fitness Center Housing  Hotel Elementary School	2,500,000 SF 202,000 SF 43,000 SF 45,000 SF 40,000 SF 20,000 SF 5,400 Beds 150 Faculty DU 150 Rooms 80,000 SF	Proposed
26		1340 S. Figueroa Street	Condominium	273 DU	Under Construction
27		1130 W. Wilshire Boulevard	Office	86,844	Proposed
28		1050 S. Grand Avenue	Condominium Retail Restaurant	151DU 3,472 GLSF 2,200 GSF	Proposed
29		848 S. Grand Avenue	High-Rise Condominium Supermarket	420 DU 38,500 GSF	Proposed
30		1200 S. Grand Avenue	Apartment Retail	640 DU 45,000 GLSF	Proposed
31		California African American Museum 600 S. State Drive	Museum Addition	77,100 GSF	Proposed
32		Laborers Local 300 Headquarters 2005 W. Pico Boulevard	Office Assembly Room	30,300 GSF 4,500 GSF	Under Construction
33		900 W. Wilshire	Condominium	100 DU	Under

**Table II-1  
List of Related Projects<sup>1</sup>**

Map No.	File/Project No.	Project Name Location	Land Use	Size	Status
		Boulevard Wilshire Grand Hotel	Hotel Fitness Facility General Office Retail/Restaurant Meeting Room/Ballroom	560 Rooms 20,000 GSF 1,500,000 GSF 50,000 GSF 55,000 GSF	Construction
34		USC All Sports Building 1010 W. Jefferson Boulevard	Athletic Building	91,130 GSF	Proposed
35		220 E. Washington Boulevard	Apartment Retail Restaurant	357 DU 7,750 GLSF 7,750 GLSF	Proposed
36		2100 S. Figueroa Street	Condominium Retail	291 DU 7,134 GLSF	Proposed
37		1239 W. Wilshire Boulevard	Medical Office	56,450 GSF	Proposed
38		3671 S. Vermont Avenue	Apartment Retail	80 DU 50,000 GLSF	Proposed
39		619 S. Westlake Avenue	Apartment	52 DU	Proposed
40		1700 W. Pico Boulevard	Public Elementary School	450 Students	Proposed
41		710 S. Grand Avenue	Apartment Retail Restaurant	700 DU 27,000 GLSF 5,000 GSF	Proposed
42		Metropolis Mixed-Use 851 S. Francisco Street	Condominium Office Hotel Retail	836DU 988,225 GSF 480 Rooms 46,000 GLSF	Under Construction
43		1500 S. Figueroa Street	Apartment Live-Work Retail	190 DU 10 DU 12,432 GLSF	Proposed
44		301 W. Olympic Boulevard	Apartment Retail Restaurant	300 DU 14,500 GLSF 8,500 GSF	Proposed
45		845 S. Figueroa Street	Discount Supermarket	21,122 GSF	Proposed
46		3014 Royal Street	Childcare Center	114 Students	Proposed
47		1027 S. Olive Street	Apartment	100 DU	Proposed
48		1300 S. Hope Street	Apartment Retail	419 DU 42,400 GLSF	Proposed
49		928 S. Broadway	Apartment Condominium Retail	670 DU 17 DU 58,800 GLSF	Proposed

GSF = gross square feet      DU = dwelling unit      GLSF = gross leasable square feet

<sup>1</sup> Sources: City of Los Angeles Departments of Planning and Transportation.

<sup>2</sup> Project based on 5 year Master Plan for the Los Angeles Trade Technical College.

<sup>3</sup> Source: Convention and Event Center Draft EIR, April 2012. The projected year of completion for the Farmer's Field

**Table II-1**  
**List of Related Projects<sup>1</sup>**

<b>Map No.</b>	<b>File/Project No.</b>	<b>Project Name Location</b>	<b>Land Use</b>	<b>Size</b>	<b>Status</b>
<i>project is year 2017, after the completion of the proposed Project.</i>					
<sup>4</sup> <i>Source: University of Southern California Development Plan Draft EIR, May 2010. The projected year of completion for the USC Development Plan project is year 2030, after the completion of the proposed Project.</i>					
<i>Source: Linscott, Law &amp; Greenspan, Engineers, 2013, and City of Los Angeles, 2013.</i>					

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## III. PROJECT DESCRIPTION

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### A. PROJECT APPLICANT

The Applicant for the Oak Village Residences project (the “Project”) is the Anastasi Development Company, located at 511 Torrance Boulevard, Redondo Beach, CA 90277.

### B. PROJECT CHARACTERISTICS

The Project consists of the demolition of all existing on-site land uses and development of the Project site with a 182,575-square-foot residential condominium/townhouse complex with a total of 142 for-sale dwelling units (refer to Figures III-1 through III-6B).<sup>1</sup> Four townhouse structures (total of 8 four-bedroom units) would be located on the western portion of the Project site along 20<sup>th</sup> Street. Two condominium structures would house 134 units comprising 32 one-bedroom units, 76 two-bedroom units, 24 three-bedroom units, and 2 four-bedroom units. All units would range in size from approximately 700 square feet to 2,100 square feet.

#### Building Height

The Project is designed in modules. The tallest module (6-stories or 65.5 feet) fronts on Washington Boulevard and is located the furthest from the historic homes on 20<sup>th</sup> Street. The center portion of the Project would step-down to four-stories (or 40-feet) while the southern portion of the Project that fronts on 20<sup>th</sup> Street would step-down to a height of two-stories (or 35 feet). Figure III-3 depicts the heights of the Project modules and compares the Project’s heights to a typical home on the south side of 20<sup>th</sup> Street.

#### Architectural Treatment

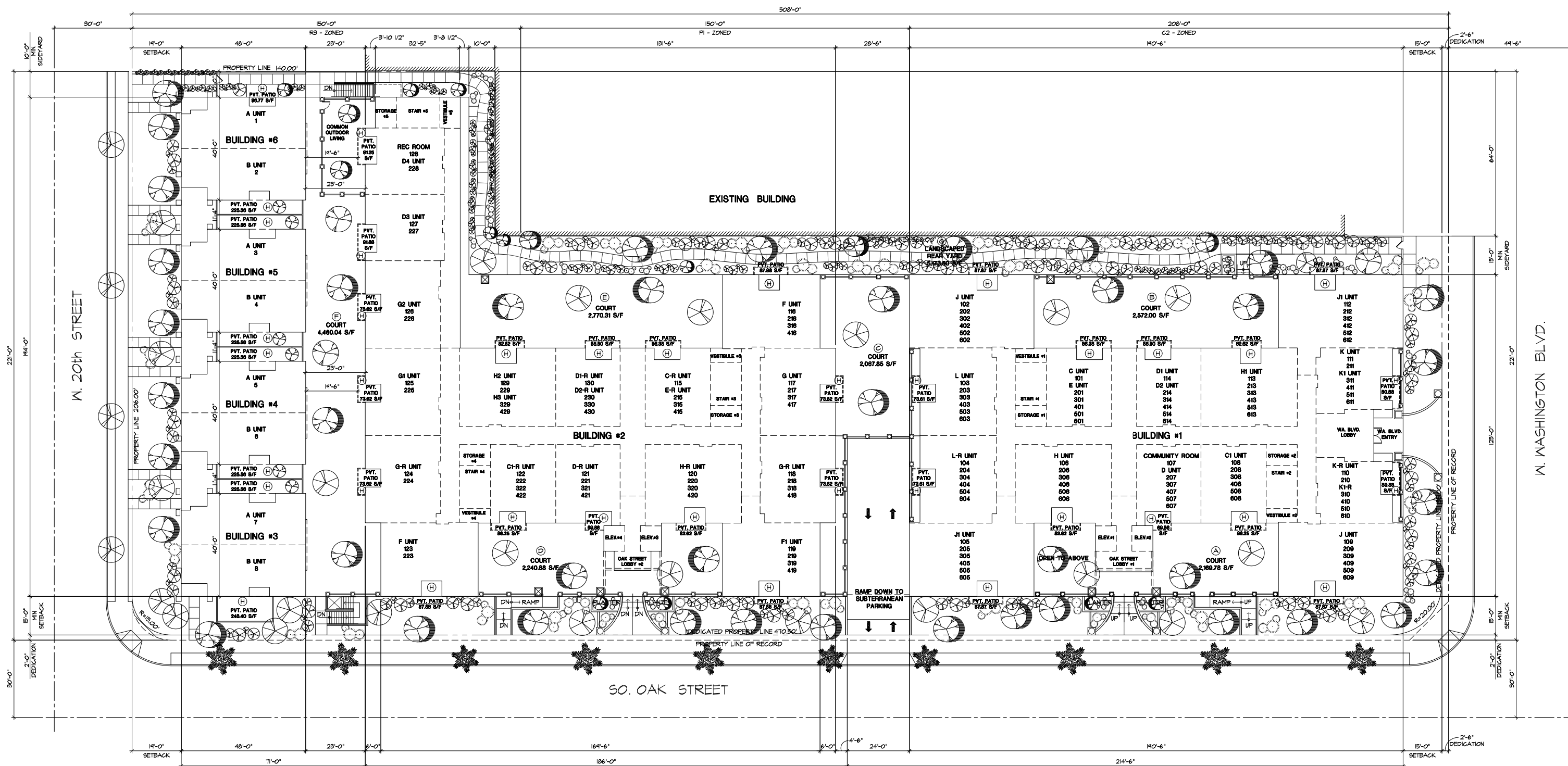
The Project fronts onto three streets: Washington Boulevard, Oak Street and 20<sup>th</sup> Street. Front doors and major architectural façades face each of these streets.

As previously discussed, the Project site facing 20<sup>th</sup> Street consists of four parcels, which are reflected in the four townhouse buildings. Each building has the identical, separate footprint that establishes a rhythm along 20<sup>th</sup> Street. The buildings are similar in size and scale to the contributing residential buildings on 20<sup>th</sup> Street. Each building would have gabled roofs, characterized by overhanging eaves, knee braces, and vergeboards, which are all typical of the Craftsman-style architecture. Also, the front doors and major architectural features of these buildings would face toward 20<sup>th</sup> Street.

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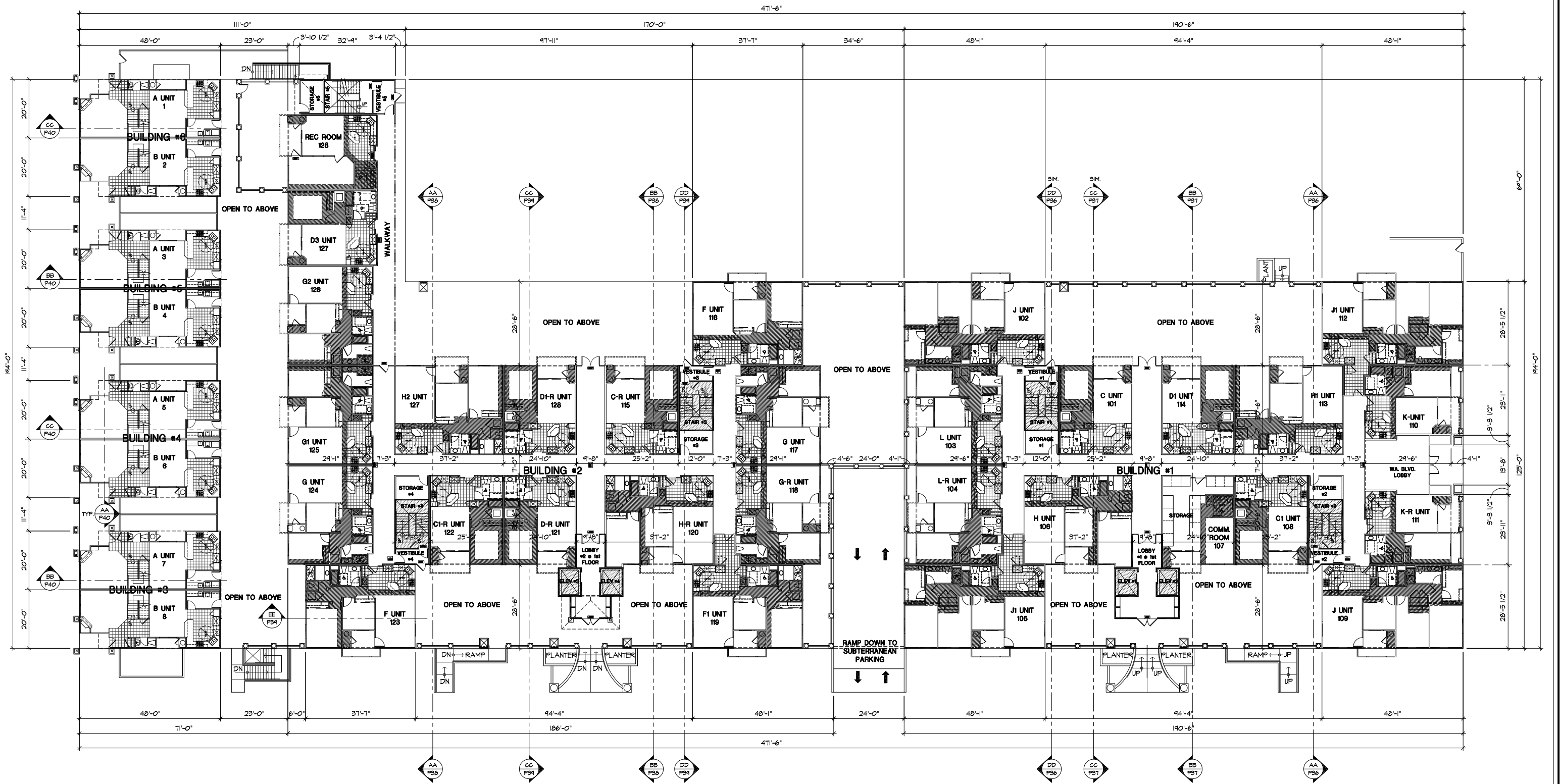
<sup>1</sup> Additional Project plans are included in Appendix III.

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Source: Lindquist Architects, December 18, 2006.

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Source: Lindquist Architects, December 18, 2006.



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Source: Lindquist Architects, December 16, 2008.

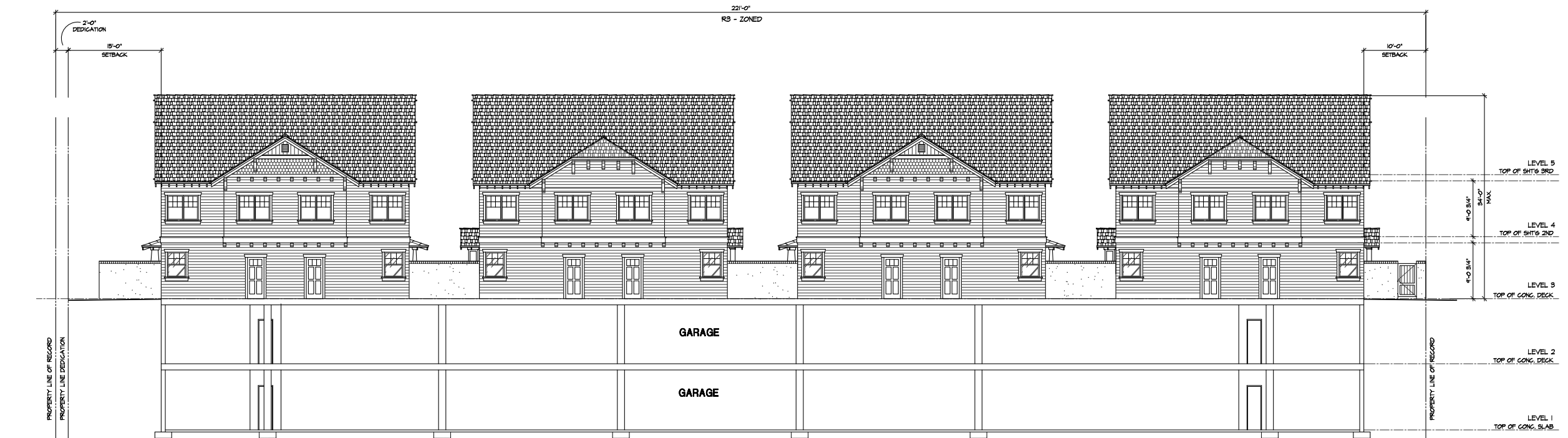
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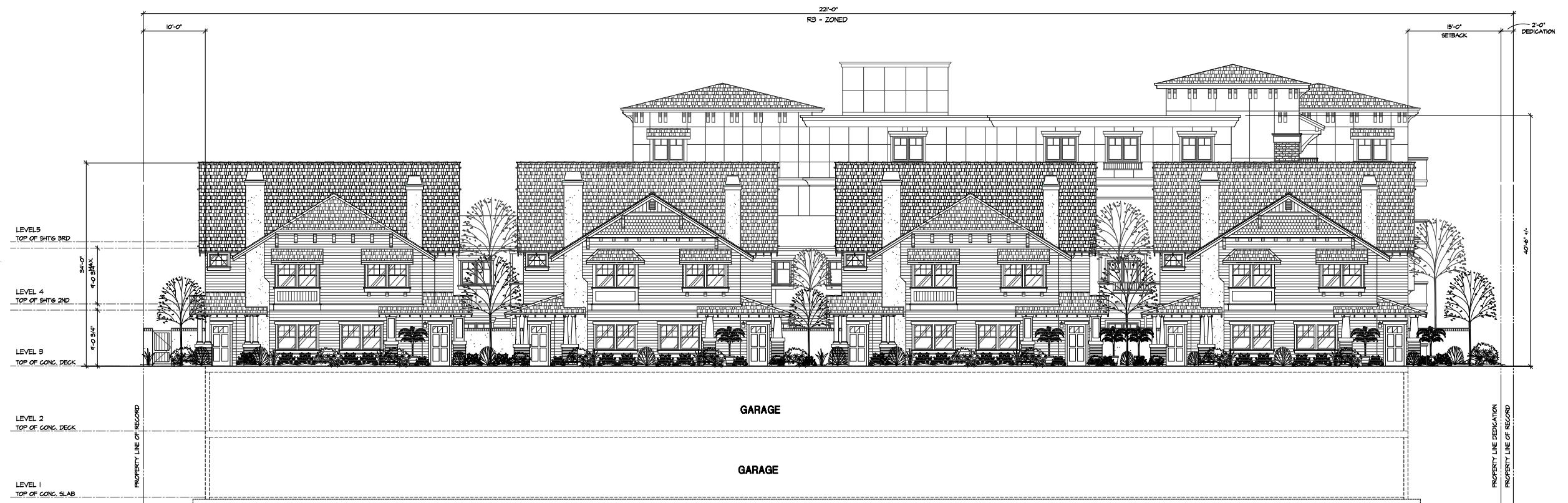
Source: Lindquist Architects, December 16, 2008.

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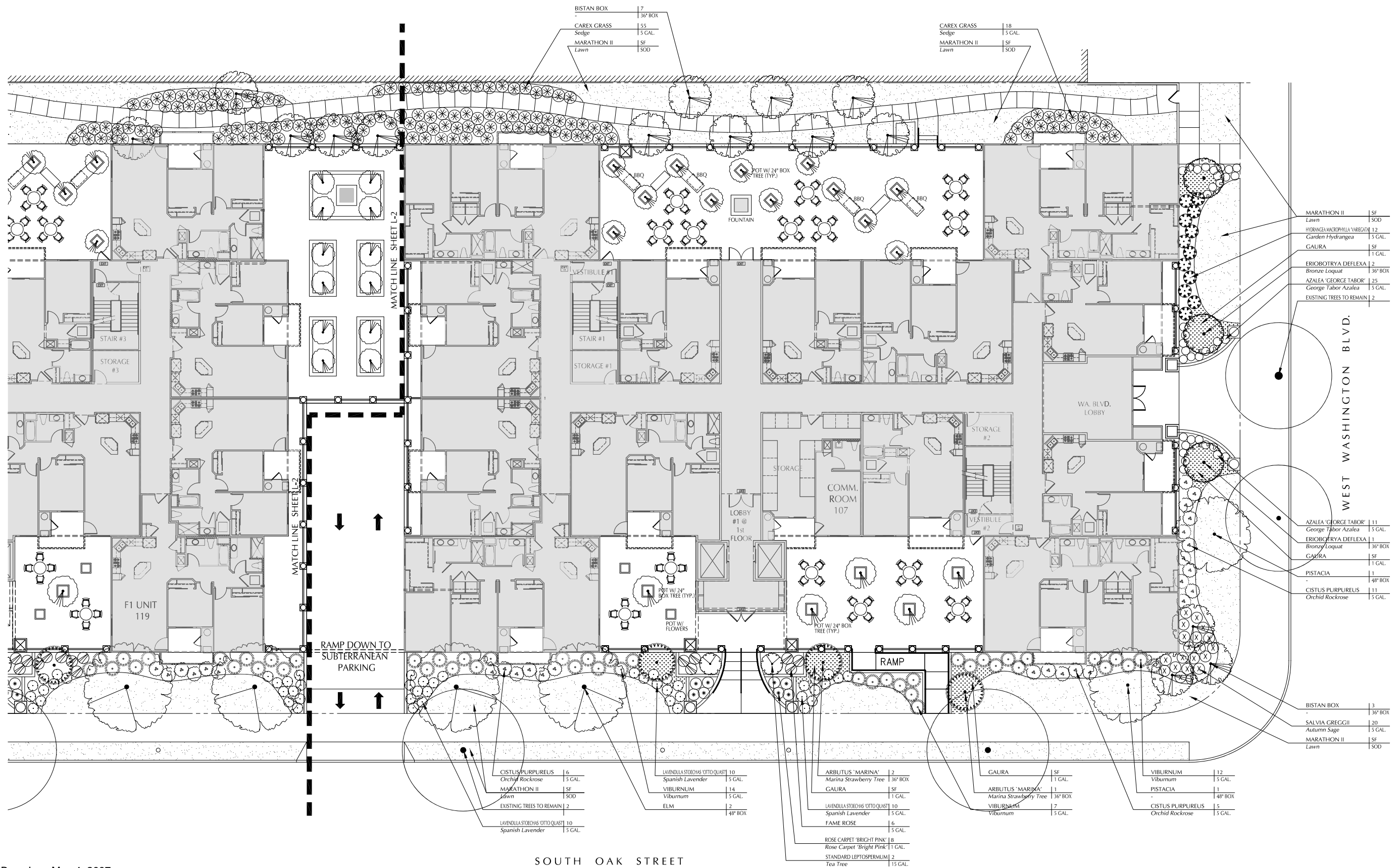
REAR ELEVATION



20TH STREET ELEVATION

Source: Lindquist Architects, December 16, 2008.

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As proposed, the condominium building facing Washington Boulevard would be similar in scale to the Casa Camino Real kitty-corner from the Project Site. The Casa Camino Real is approximately 90 feet in height, 105 feet in width, and 175 feet in length. The condominium building facing Washington Boulevard would be approximately 65 feet in height, 125 feet in width, and 190 feet in length. The condominium building facing Oak Street would be comparatively smaller, providing transitions in height and scale from the Washington Boulevard commercial strip to the single-family residential buildings to the south. This condominium building is proposed to be approximately 40 feet in height, 125 feet in width, and 169 feet in length.

The design of the condominium buildings was developed in close consultation with staff at the Department of City Planning to provide architectural articulation to break-up the façade and provide a pedestrian friendly, walkable environment, including 15-foot setbacks along Washington Boulevard and Oak Street. Although the condominium buildings would mostly be covered by flat roofs, the bays at corners and entrances would be covered by low-pitched, hipped roofs. The condominium buildings would also be divided horizontally by a change in materials and molding at the ground and top floors. Windows and balconies are designed to be stacked vertically, creating a pattern of solids and voids. Changes in wall planes occur at corners and entrances, which would project slightly from the main building mass.

The Project is still in the preliminary design stage and as such, final paint colors, construction details and materials and paving materials have not yet been selected. However, the applicant has indicated a willingness to make every effort to select materials that have the same visual quality as those used historically in the HPOZ.

### **Proposed Vehicular Site Access**

The Project's site access scheme is displayed on Figure III-1. Access to the Project would be provided via one driveway on Oak Street, along the easterly property frontage. The driveway would be located approximately mid-way between Washington Boulevard and 20th Street on Oak Street and would provide access to an internal ramp, which extends to the subterranean parking levels. The driveway would be constructed to the City's design standards and would accommodate full access turning movements (i.e., left-turn and right-turn ingress and egress turning movements) into and out of the site, as is currently provided at the existing site driveways along Oak Street. No Project site access would be provided to or from Washington Boulevard to the north or 20<sup>th</sup> Street to the south.

### **Pedestrian Access/Walkability**

Gated access for pedestrians would be from the Washington Boulevard, Oak Street, and 20<sup>th</sup> Street frontages. No corner entryways are proposed. In addition, the Project site has been designed to encourage pedestrian activity and walking as a transportation mode. Specifically, the pedestrian walkways within the site and the adjacent sidewalks would be appropriately landscaped and designed to provide a friendly walking environment. Additionally, the walkways would be well lit and include appropriate on-site Project-related wayfinding signage. In addition, the interior of the Project would

provide a combination of landscape and hardscape features that facilitate internal accessibility as well as connectivity to uses beyond its boundaries. A discussion of the Project's consistency with the City's Walkability Checklist is included in Section IV.H (Land Use and Planning).

### **Parking**

Two subterranean levels of parking would provide a total of 320 parking spaces, which meets the LAMC parking requirement for the Project. Vehicle access to the subterranean parking, for both residents and visitors, would be provided via one driveway on Oak Street, the easterly property frontage. As part of the parking supply, the Project would provide a minimum of eight handicap accessible spaces. This complies with the Americans with Disabilities Act (ADA) requirement of a minimum of eight handicap spaces for parking facilities with 301 to 400 spaces, with one in every eight handicap spaces being van accessible.

In accordance with the City's Bicycle Ordinance, the Project would include 147 long-term bicycle parking spaces, 14 short-term bicycle parking spaces, and a 100-square-foot bicycle workroom.

### **Open Space/Landscaping**

The Project includes a total of 21,722.61 square feet of public/common open space, or 24.91 percent of the Project site area. Public/common open space would consist of both landscape and hardscape areas. Additionally, the Project includes 13,440.60 square feet of private open space, consisting of private patios and balconies, and two recreational rooms (1,724 square feet, inclusive of the 13,440.60 square feet). The Project would provide a total of 35,163.21 square feet of open space. Proposed landscaping for the Project site is presented on Figures III-6A and III-6B.

### **Project Amenities**

Section 66477 of the California Government Code, also known as the Quimby Act, authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, in accordance with LAMC Section 17.12, authorized pursuant to the Quimby Act, the Project Applicant proposes to meet its Quimby Act obligation through in-lieu payment of Quimby fees rather than land dedication. The City would assess the amount of the payment during the Project's permitting process.

### **Exterior/Night Lighting**

The following exterior/night lighting plan features are included in the Project to minimize light pollution and glare:

- Design limits on the amount of landscape lighting per foot shall be established.
- Only downlighting for exterior-building mounted fixtures would be permitted; uplighting fixtures for building facades and trees shall be prohibited.

- “Glowing” fixtures that would be visible from existing communities or public roads shall be prohibited.
- Only well-shielded fixtures with full cut-off features that would allow no direct beam illumination into the night sky shall be permitted.
- Lighting fixtures intended for security purposes shall be equipped with motion sensors.

### **Energy Conservation**

The following energy conservation features are included in the Project design:

- Buildings shall be constructed in accordance with the City’s Green Building standards.
- Installation of light colored roofs to buffer direct sunlight exposure.
- Installation of windows Low Emissivity (Low-E) glass coating rather than metallic coatings associated with reflective glass.
- Natural ventilation shall be used as an alternative to mechanical air conditioning wherever possible.
- Hot water pipes shall be insulated.

### **Water Conservation**

The following water conservation features are included in the Project design:

- Design, installation, and testing of landscape irrigation system by a qualified landscape contractor certified by the Irrigation Association (IA), California Landscape Contractors Association (CLCA), and/or who is partnering with the U.S. Environmental Protection Agency's (EPA) WaterSense program to optimize water use.
- A “smart sprinkler” system with weather-based irrigation controllers (WBICs) and rotating sprinkler nozzles shall be installed to provide irrigation for the landscaped areas.
- WBICs shall be Smart Water Application Technologies (SWAT) tested, an independent, third party performance testing protocol.
- Drought tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption.
- Ultra-low flush water toilets and water saving showerheads shall be installed.
- Low-flow faucet aerators shall be installed on all sink faucets.
- Re-circulating or point-of-use hot water systems shall be installed to reduce water waste in long piping systems where water must be run for considerable periods before heated water reaches the outlet.
- ENERGY STAR<sup>®</sup> appliances shall be installed in laundry rooms for communal use.

## Security Features

The following security features are included in the Project design to reduce demand for police protection services:

- Nighttime security lighting
- Building security systems
- Secure parking facilities

## Construction Schedule

The Project's construction phase is estimated to occur over an approximately 2-year period, with construction activities beginning in year 2013 and occupancy in year 2015. The first phase would consist of the demolition of the existing one-story, brick building, the free-standing ice making unit, the peripheral concrete block wall, and removal of the parking lots asphalt pavement. Site preparation, consisting of tree and vegetation removals and the removal of existing utility systems (including the catering facility's exterior lighting system) would follow after the demolition. Building and paving rubble, as well as all vegetative material, would be hauled away to an approved dumpsite or to a diversion site for separation before disposal or recycling. Grading activities, building construction and finish work (i.e., application of architectural coatings and asphalt work) would then follow in sequence. Grading would primarily consist of excavation for the 2-level subterranean parking structure that would underlie the six proposed buildings. Approximately 65,000 cubic yards of earth materials would be excavated and removed from the Project site.

Table III-1 presents the estimated duration of each major phase of construction; however, these phases are not strictly sequential and may overlap. For example, demolition activities on one part of the Project site may occur simultaneously with site preparation being conducted elsewhere on the property.

**Table III-1  
Construction Phase Summary**

<b>Construction Phase</b>	<b>Duration</b>
Demolition	1 Month
Site Preparation	2-3 Weeks
Grading	2-3 Months
Building Construction	24-25 Months
Architectural Coatings/Asphalt	1-2 Weeks

The staging for all construction equipment, materials, and construction-worker parking would be provided onsite. All truck traffic would access the site via Washington Boulevard to Oak Street. No construction vehicles would use 20<sup>th</sup> Street or other residential streets.

## **C. PROJECT OBJECTIVES**

The objectives of the Project are as follows:

- To provide infill housing development, including very-low-income units, to serve the local community
- To provide a development that is compatible and complementary with surrounding land uses
- To provide adequate parking facilities to serve the proposed development residents and guests
- To mitigate, to the extent feasible, the potential environmental impacts of the Project
- To provide a mix of housing options combining multi-family development with townhouse units

## **D. DISCRETIONARY ACTIONS**

In order to allow development of the Project, the following discretionary approvals are required:

- Vesting Tentative Tract Map for the merger and re-subdivision of 10 parcels into one parcel with 142 residential units
- Zone change from [Q]C-2-2-HPOZ, P-1-HPOZ and R3-1-HPOZ to CM-1-HPOZ<sup>2</sup>
- A 28 percent density bonus request, pursuant to SB 1818, to provide 142 dwelling units including 11 very-low-income units, in lieu of the maximum permitted 111 units, with one incentive to permit a maximum 3:1 floor area ratio in lieu of the maximum 1.5:1 in the proposed CM-1-HPOZ zone
- Site Plan Review

Other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, grading permits, installation and hookup approvals for public utilities and related permits.

Other agencies that may have jurisdiction over some aspects the Project include, but are not limited to:

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<sup>2</sup> The residential land uses proposed under the CM zone are equivalent to those allowed under the R3 zone.



Regional Water Quality Board; and  
South Coast Air Quality Management District

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

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#### INTRODUCTION

Section 15128 of the *CEQA Guidelines* states the following:

*An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a Project were determined not to be significant and were therefore not discussed in detail in the EIR.*

Based on the information included below, implementation of the Project would not result in significant impacts related to the environmental impact topics listed below (refer to Appendix G of the *CEQA Guidelines*), and therefore, additional analysis of these topics is not included in Section IV of this EIR.<sup>1</sup> (Certain aspects of the impact areas identified in this section were determined to be potentially significant and are discussed further in Sections IV.B through IV.L.)

#### Aesthetics

*The Project would not have a substantial adverse effect on a scenic vista.* Scenic vistas in the Los Angeles area generally include views of the ocean, downtown skyline, and Santa Monica, San Gabriel, and San Bernardino Mountains. From the Project area, due to existing urban development, no scenic vistas are available. Thus, no further analysis of this issue is required.

#### Agricultural and Forestry Resources

*The Project would have no impact on agricultural or forestry resources.* The Project site is developed and is located in an urbanized area of the City. No agricultural uses or related operations are present within the site or surrounding area. There is no forest land, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor lands enrolled under Williamson Act contract in the project area. The Farmland of Statewide Importance map for Los Angeles County designates the site as Urban and Built Up Land. Thus, no further analysis of these issues is required.

#### Air Quality

*The Project would not create objectionable odors affecting a substantial number of people.* Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment

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<sup>1</sup> Standard City Mitigation Measures and existing U.S. Fish and Wildlife and California Department of Fish and Game regulations have been identified for some of the issues in this section. For ease of monitoring by the City, these measures/regulations will be included in the Mitigation Monitoring Report Plan (MMRP) that will be prepared for the Project.

facilities and landfills. Because the Project does not include any of these activities, no objectionable odors would occur.

### **Biological Resources**

The Project would not have a substantial adverse effect on biological resources. The Project site is located in a highly urbanized area of the City and is completely developed with commercial and parking land uses. Accordingly, the Project site is not subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, or other sensitive natural communities, on or in the vicinity of the site and the project site is not located in or adjacent to a Significant Ecological Area (SEA), as defined by the City of Los Angeles.<sup>2</sup> Consequently, the Project would have no impact on riparian habitats or other sensitive natural communities identified in City or regional policies, plans or regulations. As such, no adverse impacts to wetlands would result from implementation of the Project.

The Project site and its surrounding area do not contain any established native resident or migratory wildlife corridors or bodies of water that serve as natural habitats for fish. As such, implementation of the Project would not have a significant impact on the movement of any native resident or migratory fish or wildlife species or on any established native resident or migratory wildlife corridors, nor would the Project impede the use of native wildlife nursery sites.

No oak trees or other protected trees are located on or adjacent to the Project site. There are, however, 11 ornamental street trees located along the perimeter of the Project site, some or all of which would be replaced as part of the Project. All nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Game (CDFG) Code. Thus, to ensure that no significant impacts to nesting birds would occur as a result of the Project, the Project Applicant would be required to comply with the following existing regulation of the U.S. Fish and Wildlife Service and the CDFG related to protection of nesting birds:

BIO-1: To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Conduct vegetation removal associated with construction from September 1st through January 31st, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1st through August 31st) and keep disturbance activities constant throughout the breeding season to prevent birds from

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<sup>2</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1A.

establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.

OR...

- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

## **Cultural Resources**

*The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The Project site and areas surrounding the site are completely developed, and as such, the soils beneath the site are likely disturbed. No archaeological resources are known to exist at the Project site.<sup>3</sup> However, the Los Angeles area is generally archaeologically sensitive, and it is possible (although unlikely) that unknown resources could be encountered during construction of the Project. Should this happen, the Project Applicant would be required to implement the City's Standard Mitigation Measure listed below related to archaeological resources to ensure that no significant impacts would occur. Thus, no further analysis of the issue is required.*

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<sup>3</sup> *Records Search conducted by the South Central Coastal Information Center, November 12, 2009 (refer to Appendix IV.A to this EIR).*

- CULT-1: If any archaeological materials are encountered during the course of the Project development, the Project shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologists (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the University of California, Los Angeles (UCLA) Archaeological Information Center. A covenant and agreement shall be recorded prior to obtaining a grading permit.

*The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature.* According to the Natural History Museum of Los Angeles, no paleontological resources are known to occur at the Project site.<sup>4</sup> However, paleontological resources have been found in the Project area. Thus, it is possible that unknown resources could be encountered during construction of the Project. Should this happen, the Project Applicant would be required to implement the City's Standard Mitigation Measure listed below related to paleontological resources to ensure that no significant impacts would occur. Thus, no further analysis of the issue is required.

- CULT-2: If any paleontological materials are encountered during the course of the Project development, the Project shall be halted. The services of a paleontologist shall be secured by contacting the Center for Public Paleontology – University of Southern California (USC), UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement shall be recorded prior to obtaining a grading permit.

*The Project would not disturb any human remains, including those interred outside of formal cemeteries.* No human remains are known to occur at the Project site. In the unlikely event that human remains are encountered during construction of the Project, the Project Applicant would be required to implement the City's Standard Mitigation Measure listed below related to human remains that ensures no significant impacts would occur. Thus, no further analysis of the issue is required.

- CULT-3: If human remains are discovered at the Project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City Public Works Department and County coroner shall be immediately notified. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be

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<sup>4</sup> Records Search conducted by the Natural History Museum, October 14, 2009 (refer to Appendix IV.A to this EIR).

notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

## Geology & Soils

*The Project would not 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.* Based on the *Geotechnical Investigation* prepared for the Project site, the site is not located within an Alquist-Priolo Earthquake Zone.<sup>5</sup> Thus, no further analysis of this issue is required.

*The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.* The Project site is located in a seismically active region, and development of the Project would expose future users of the site to seismic groundshaking. Seismic groundshaking could damage the proposed buildings, parking areas, and utility infrastructure. However, the Project Applicant would be required to design and construct the Project in conformance to the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Conformance with current LAMC requirements would minimize the potential for structures on the Project site to sustain damage during an earthquake event would thus not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to groundshaking would be less than significant.

*The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction.* Based on the *Geotechnical Investigation* prepared for the Project site, the site is not subject to liquefaction. Thus, no further analysis of this issue is required.

*The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.* The Project site and surrounding area are relatively flat and are not located within an area that is prone to landslides. Thus, no further analysis of this issue is required.

*The Project would not result in substantial soil erosion or the loss of topsoil.* The Project site is completely developed with a structure, and the surface area is impervious. After implementation of the Project, the site would remain impervious, and no unpaved or unprotected surfaces would be exposed to stormwater drainage or any other type of drainage. Thus, no further analysis of this issue is required.

*The Project would not 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 landslides, lateral spreading,*

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<sup>5</sup> *Geotechnical Investigation, Norcal Engineering, October 2004 (refer to Appendix IV.A).*

*subsidence, liquefaction, or collapse.* The term liquefaction describes a phenomenon in which saturated, cohesionless soils temporarily lose shear strength (liquefy) due to increased pore water pressures induced by strong, cyclic ground motions during an earthquake. Structures constructed on or above potentially liquefiable soils may experience bearing capacity failures due to the temporary loss of foundation support or vertical settlements (both total and differential), and may undergo lateral spreading. As discussed above, the Project site is not susceptible to liquefaction. Thus, the potential for liquefaction-induced lateral spreading, subsidence or collapse is also low. The *Geotechnical Investigation* prepared for the Project site includes recommendations for removal of existing fills, engineering of soils at the site prior to building construction, and foundation design. The design and construction of the Project would occur in accordance with the recommendations made in this investigation and in a final geotechnical report that would be prepared for the Project to reflect final site plans, as required by the City. Additionally, the Project site and surrounding area are relatively flat, with no potential for landslides. Therestore, Project impacts related to geologic and soil instability would be less than significant.

*The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property.* Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. The IBC directs expansive soil tendency be graded by Test Standard 18-1. The IBC mandates that “special [foundation] design consideration” be employed if the Expansion Index is 20 or greater. According to the *Geotechnical Investigation* prepared for the Project indicates that the underlying soil at the Project site is of a clayey-silt conformation with an Expansion Index of 60, falling within the range of ‘Medium’ expansion potential. The *Geotechnical Investigation* includes recommendations for foundation design to accommodate expansive soil properties. These foundation design recommendations, in combination with the construction requirements imposed upon the proposed project by the City’s Building and Safety Division would ensure that no significant impacts related to expansive soils would occur.

*The Project would not 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.* The Project site is located in a developed area of the City that is served by a municipal wastewater collection, conveyance, and treatment system. No septic tanks are proposed. Thus, no further analysis of this issue is required.

## **Hazards & Hazardous Materials**

*The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.* The Project includes development of residential uses. The types and amounts of hazardous materials associated with routine, day-to-day operation of the Project would include typical cleaning, building maintenance, and landscaping materials and landscaping

chemicals. The transport, use, and disposal of these materials would not pose a significant hazard to the public or the environment. Thus, no further analysis of this issue is required.

*The Project would not 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. A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project site for the purpose of identifying and assessing the characteristics of the site that could be of environmental concern, or to conversely and reasonably illustrate the lack of site characteristics of environmental concern (refer to Appendix IV.A). The Phase I ESA concludes that the Project site does not have any “reportable environmental issues.” Considering the age of the structures on the Project site, it is possible that the structures contain asbestos-containing materials (ACMs) and lead-based paint. However, the Project Applicant would be required to comply with the City’s Standard Mitigation Measures (listed below) to ensure that no significant impacts related to ACMs and lead-based paint would occur.*

Additionally, the Project site is located within a Methane Buffer zone. Any development of the site is subject to the requirements of LAMC Section 91.106.41, as well as LAMC Ordinance No. 161,552. Through compliance with the requirements of the LAMC, the Project would not result in any significant impacts related to methane.

- HAZ-1: Prior to any demolition activities, a licensed asbestos inspector shall be retained to determine the presence of ACMs within buildings at the Project site. A licensed asbestos abatement contractor shall be retained to remove all ACMs from the Project site during the Project’s demolition phase.
- HAZ-2: Prior to any demolition activities, a licensed lead-based paint inspector shall be retained to determine the presence of lead-based paint within buildings at the Project site. A licensed lead-based paint abatement contractor shall be retained to remove all lead-based paint from the Project site during the Project’s demolition phase.

*The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Although schools are located within one-quarter mile of the Project site, as discussed above, the Project includes development of residential and retail uses. The types and amounts of hazardous materials associated with routine, day-to-day operation of the Project would include typical cleaning, building maintenance, and landscaping materials and landscaping chemicals. The use of these common cleaning, maintenance, and landscaping materials would not affect any of the schools in the vicinity of the Project. Thus, no further analysis of this issue is required.*

*The Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. Based on the Phase I ESA prepared for the Project site, the site is not included on the*



list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, no further analysis of this issue is required.

*The Project would not be located within two miles of a public airport, public use airport, or in the vicinity of a private airstrip, and would not result in a safety hazard for people residing or working in the Project area.* Thus, no further analysis of this issue is required.

*The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.* No aspects of the Project would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, the Project would comply with all applicable City policies related to disaster preparedness and emergency response. Thus, no further analysis of this issue is required.

*The Project would not 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.* The Project site is located in an urbanized portion of the City that does not include wildlands or high fire hazard terrain or vegetation. Thus, no further discussion of this issue is required.

## **Hydrology & Water Quality**

*The Project would not violate any waste discharge requirements.* The Project would not include any point-source discharge. Thus, no further discussion of this issue is required.

*The Project would not 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).* During the Project's construction phase, temporary dewatering would be required to allow construction of the proposed subterranean parking structure. The water would either be discharged to the local stormdrain system or conveyed to the Hyperion Treatment Plant. The amount of groundwater that would be discharged as a result of the temporary dewatering would be minimal and would not substantially affect groundwater supplies. Additionally, the Project site in its existing state is completely impervious and is not an area that provides any groundwater recharge. The Project would not affect this condition. Therefore, the Project would not affect groundwater recharge and no further discussion of this issue is required.

*The Project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site.* As stated previously, the Project site in its existing state is completely impervious. During storm events, all stormwater that comes in contact with the site runs off the site and discharges to the local stormdrain system. Under the post-Project condition, drainage at the site would occur in the same manner. All runoff would be directed to drainage

infrastructure and discharged directly to the stormdrain. No runoff would come in contact with bare ground and would not be discharged directly to a stream or river. Therefore, the Project would not cause erosion or siltation. Thus, no further discussion of this issue is required.

*The Project would not substantially alter the existing drainage pattern of the site or area, substantially increase the rate or amount of surface runoff, or provide substantial additional sources of polluted runoff.* As stated previously, the Project site in its existing state is completely impervious. During storm events, all stormwater that comes in contact with the site runs off from the site and discharges to the local stormdrain system. The Project would result in development of the site with the same amount of impervious surface or slightly less, due to water quality best management practices (BMPs). The amount of runoff from the site during a storm event would not change substantially from the existing condition and the Project would not cause flooding on or off of the Project site. Thus, no further discussion of this issue is required.

*The Project would not 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.* The Project site is not located within a 100-year flood hazard area. Thus, no further discussion of this issue is required.

*The 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.* The Project site is not located within the vicinity of any body of water, levee or dam. Thus, no further discussion of this issue is required.

*The Project would not result in inundation by seiche, tsunami, or mudflow.* The Project site is not located near the ocean or any other substantial body of water or hillsides. Thus, no further discussion of this issue is required.

## **Land Use & Planning**

*The Project would not physically divide an established community.* The Project includes development of a site that is developed and has been developed for many decades and is located in a developed, urban area of the City. Thus, no further discussion of this issue is required.

*The Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.* The Project site and surrounding area are developed with urban land uses and are not subject to any habitat conservation plan or natural community conservation plan. Thus, no further discussion of this issue is required.

## **Mineral Resources**

*The Project would not 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.* According to the California Department of Conservation,

Division of Oil, Gas, and Geothermal Resources District 2 Regional Wildcat Map (W1-2), no oil wells are present on the Project site or proximate to the Project site. Also, according to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the Project site is not located near or in any oil field or major oil drilling area, and according to the City General Plan Conservation Element Exhibit A, the Project site is not located near or in any mineral resources zone. Thus, the Project site is not located in an area of important mineral resources, and no further discussion of this issue is required.

*The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.* The Project site is not delineated as a recovery site for locally-important mineral resources. Thus, no further discussion of this issue is required.

### **Noise**

*The Project would not expose people residing or working in the Project area to excessive noise levels associated with an airport or private airstrip.* The Project site is not located within two miles of any airports or private airstrips. Thus, no further discussion of this issue is required.

### **Population and Housing**

*The Project would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.* The Project site does not currently contain any housing or residential population. Thus, no further discussion of this issue is required.

### **Recreation**

*The Project does not include recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.* Thus, no further discussion of this issue is required.

### **Transportation/Traffic**

*The Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.* Due to its nature and scope, implementation of the Project would not result in a change in air traffic patterns at any airport in the area. Thus, no further discussion of this issue is required.

*The Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).* All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and City Fire Department standards. Additionally, the Project site is not located near any

sharp curves or dangerous intersections, and the Project does not include land uses that would be incompatible with surrounding land uses. Thus, no further discussion of this issue is required.

*The Project would not result in inadequate emergency access.* As discussed above, all ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and City Fire Department standards and requirements. Thus, no further discussion of this issue is required.

*The Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).* The Project is a residential development in proximity to several transit lines and stops, including both bus and rail. Additionally, the Project includes provision of a bus bench near the site. Thus, the Project would support alternative modes of transportation. Therefore, no further discussion of this issue is required.

### **Utilities & Service Systems**

*The Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.* All wastewater associated with the Project would discharge to the local City sewer and would not discharge to any surface or groundwater sources. The Project would comply with all the applicable standards of the Los Angeles Regional Water Quality Control Board. Thus, no further discussion of this issue is required.

*The Project would comply with federal, state, and local statutes and regulations related to solid waste.* The Project would participate in the City's recycling and waste reduction programs. Thus, no further discussion of this issue is required.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### B. AESTHETICS

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#### ENVIRONMENTAL SETTING

##### Scenic Resources

Scenic resources identified in the *City of Los Angeles General Plan* (the “*General Plan*”) include: striking or unusual natural features; the Pacific Ocean; the Santa Monica and San Gabriel Mountains; and unique urban or historic features as seen from designated scenic highways. Due to intervening urban development and topography, unusual natural features and the ocean are not visible from the Project area. Glimpses of the Santa Monica and San Gabriel Mountains are available from intermittent viewpoints within the Project area, but anything more than slight views of these resources are not available.

The Project site is located within the University Park Historic Preservation Overlay Zone (HPOZ). The area’s rich architectural heritage makes up its most important scenic resource. As discussed in greater detail in Section IV.D (Cultural Resources), the University Park HPOZ neighborhood dates back to the 1880’s when the University of Southern California was established in the neighborhood. During this period many of the City’s wealthy relocated to this suburban neighborhood and constructed large residences. The construction dates and styles of the residences located in the overlay zone vary. The styles represented include: Queen Anne, Craftsman, Spanish Colonial Revival, and American Colonial Revival Styles. The dates of construction range from 1887’s to 1924. This neighborhood contains one of the highest numbers of Historic-Cultural Monuments within the City.

The Project site is located in the South Los Angeles Community Plan area. The Project site is not visible from any designated scenic highway. The nearest designated scenic highway is Adams Boulevard, which is designated by the South Los Angeles Community Plan as a Major Scenic Highway II between Arlington Avenue on the west and Figueroa Street on the east. Due to the general area’s flat terrain and dense intervening urban development, the Project site cannot be seen from Adams Avenue.

##### Visual Character

The Project site is located on the south side of Washington Boulevard just southeast of Interstate 10 (I-10) and west of the State Route 110 (SR 110). The surrounding land uses within the general vicinity of the Project site are a mix of low- to mid-intensity commercial/retail with some industrial. However, further set back from Washington Boulevard are pockets of neighborhoods of mixed single- and multi-family residences. For the most part, the immediate area to the south of the Project site is residential. The area immediately surrounding the Project site is somewhat visually incoherent as it encompasses buildings of various heights, uses, and build dates, including those that are newly constructed in a contemporary design as well as buildings that are decades older and represent the architectural styles of former times.

Views of the Project site are shown on Figures II-3 and II-4 in Section II (Environmental Setting), and views of the area surrounding the Project site are shown on Figures II-5 through II-10. To the west of the

Project site is a two-story commercial building that abuts the on-site catering building and parking lot on site. A parking lot that serves as a loading and staging area for this two-story commercial building abuts the southwest corner of the Project site. On the same block as the Project site, but farther to the west and fronting on Washington Boulevard at the corner of Toberman Street, is the Downtown Value School, a two-story charter school. Directly across Toberman Street from the Downtown Value School is a self-serve storage facility, which is secured by chain link fencing and razor wire. To the south of the Downtown Value School, Toberman Street is a narrow residential street consisting of a mix of one and two-story, single and multi-family residences.

To the east of the Project site, across Oak Street at its intersection with Washington Boulevard, is Giroux Glass, an industrial glass manufacturing plant. Farther to the east beyond Giroux Glass is a Groman Mortuary. South of Giroux Glass, between Oak Street and Norwood Street, are two schools, a USC extension school and the Norwood Street Elementary School. The entrance to the Norwood Street School is on 21<sup>st</sup> Street at its corner with Oak Street. A second entrance to Norwood Street School is located on Norwood Street, as is the school's playground.

As previously indicated, the Project site is bounded on the south by 20<sup>th</sup> Street, a discontinuous roadway that jogs northeast across Toberman Street. The existing land uses on this portion of 20<sup>th</sup> Street, which extend west across Toberman Street, are characterized by a mix of one- and two-story single and multifamily residences. However, the portion of 20<sup>th</sup> Street that is directly south of the Project site consists almost entirely, of large single family residences most of which appear to have been recently renovated and are of a similar architectural style.

Further south and to the east of the Project site along 21<sup>st</sup> Street and Norwood Street are more single and multifamily residences. On the north side of Washington Boulevard in the vicinity of the Project site is an abandoned church and a five story mixed use structure, as well as a mix of low to mid height retail and commercial buildings.

The existing visual setting for the Project is a 2.03-acre rectangular-shaped property located at the southwest corner of Washington Boulevard at Oak Street that consists of a non-descript one-story, brick building that fronts onto Washington Boulevard and a paved surface parking lot that extends south behind the building to the end of the property at 20<sup>th</sup> Street. The Project site is currently used as a commercial catering facility. The building was constructed in 1978 and has an area of approximately 12,335 square feet. The topography of the Project site is relatively flat. The following is a general description of the existing visual character of the Project site's exterior.

The brick building is two-toned (concrete grey and a dark reddish-brown), has no setback from the Washington Boulevard sidewalk, and has little architectural articulation to soften its utilitarian appearance. Behind this building lies a large paved parking area where the catering trucks are parked and serviced. A concrete block wall (approximately eight feet in height) encloses the parking/service area along Oak and 20<sup>th</sup> Streets. A driveway provides truck access to the facility from Oak Street, at about mid block. South of this driveway, a mural has been painted on the peripheral wall by students of the

Norwood Street School, which is located directly across Oak Street from the Project site (free-standing ice making unit is in the center of the parking area). The mural was painted at various times over the past few years.

As previously indicated, the Project site is bounded by 20<sup>th</sup> Street on its south side. The concrete wall on the south side is painted a uniform chocolate brown and is topped by razor wire. A landscape strip, approximately eight feet in width, lies between the peripheral wall and the sidewalk. Mature street trees along both Oak Street and 20<sup>th</sup> Street have put out horizontal roots that, over time, have broken and raised the adjacent sidewalk.

Views of the interior of the catering truck service and parking area are restricted to what can be seen from the access driveway and above the surrounding concrete block walls along Oak and 20<sup>th</sup> Streets. Additionally, a partial view into the rear of the Project site is provided by a low wall located at the southwest corner of the site. However, the catering trucks are taller than the walls and their tops are visible from outside when they are parked next to the walls. Also visible above the surrounding walls are the tall night lighting poles in the parking/service (approximately 30 feet in height) each of which bears multiple, unshielded fixtures.

### **Night Lighting**

The Project site is located in a brightly illuminated portion of the city. Foremost, there is substantial night light glow from the intensively developed nearby downtown area. Traffic traveling along the I-10 and SR 110 also contribute to the overall bright night glow that pervades the area. In addition, Washington Boulevard is a source of a variety of bright illumination, including street lights and vehicle headlights, while the commercial uses that front on Washington are illuminated with security lighting, advertising and window glow. The Project site is also well illuminated by a series of tall lighting poles, each with multiple fixtures. Because of the height of these poles (approximately 30 feet), the surrounding neighborhood receives substantial glare and spillover lighting from the Project site. In addition, street lights along Oak and 20<sup>th</sup> Streets provide further lighting in the area.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

#### ***CEQA Guidelines***

In accordance with Appendix G to the *CEQA Guidelines*, a project could have a significant impact if the project would do one or more of the following:

- a) Have a substantial adverse effect on a scenic vista;
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;



- c) Substantially degrade the existing visual character or quality of the site and its surroundings; or
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

### ***L.A. CEQA Thresholds Guide***

#### *Views*

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- 1) 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);
- 2) Whether the project affects views from a designated scenic highway, corridor, or parkway;
- 3) The extent of obstruction (e.g. total blockage, partial interruption, or minor diminishment); and
- 4) The extent to which the project affects recognized views from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

#### *Visual Resources*

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- 1) 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;
- 2) The amount of natural open space to be graded or developed;
- 3) 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.;
- 4) The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- 5) The degree to which 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;
- 6) The degree to which the project would contribute to the area's aesthetic value; and

- 7) Applicable guidelines and regulations.

#### *Artificial Light*

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- 1) The change in ambient illumination levels as a result of project sources; and
- 2) The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

#### *Shade/Shadow*

Based on criteria established in the *L.A. CEQA Thresholds Guide*, a project would have a significant impact if the project would:

- Cast shadow on shade-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

#### ***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any significant impacts related to issue “a” (have a substantial adverse effect on a scenic vista) listed under the *CEQA Guidelines*. Thus, no further discussion of these issues is required.

Regarding “Views” listed under the *L.A. CEQA Thresholds Guide*, the factors listed under this topic correspond to issue “a” listed under the *CEQA Guidelines*. As discussed above, no further discussion of this topic is required.

Regarding factors 2 and 3 listed under the *L.A. CEQA Thresholds Guide*, neither the Project site nor the surrounding area contains any natural open space. Thus, no further discussion of factors 2 and 3 is required. Regarding factors 1 and 4 through 7 under the *L.A. CEQA Thresholds Guide*, these factors are the same factors that are considered in the analysis required to address issues “b” and “c” listed under the *CEQA Guidelines*. Thus, Project impacts related to scenic resources and visual character (issues “b” and “c”) are discussed below and consider factors 1 and 4 through 7.

Regarding “shade/shadow,” no shade-sensitive land uses are located directly to the west, north, or east of the Project site. Thus, the Project would not result in any impacts related to shade/shadow, and no further discussion of this issue is required.

## **Project Impacts**

### ***Scenic Vistas***

The construction of the Project, with a maximum height of six-stories, would create an arc of obstruction to potential skyline views extending approximately 180 degrees from west to north to east, depending upon the location of the observer. However, as previously discussed, there are no public scenic vistas available from or through the Project site. The area's flat terrain and surrounding dense urban development currently combine to block views of the downtown skyline and the San Gabriel Mountains, the two most interesting large scale scenic features in the area. Notwithstanding the absence of scenic vistas, there are partial views of smaller scale elements in the Project vicinity that may be blocked by the Project, such as the architecturally interesting Casa Camino Real building on Washington Boulevard. However, such impacted views are primarily from private homes which, as previously discussed, CEQA does not treat as significant. Therefore, while Project impacts with respect to private views would be adverse, the Project would not have a substantial adverse effect on a public scenic vista, and this impact would be less than significant.

### ***Scenic Resources***

According to the *L.A. City CEQA Threshold Guidelines*, 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 park areas; etc.

There are no scenic resources such as historic buildings, monuments, gardens, or geologic features on the Project site that could be damaged by the Project. However, 11 mature Indian Laurel Fig street trees (*Ficus microcarpa nitida*) are located within the sidewalk area just outside of the the Project site that have some aesthetic value: they provide some greenery in an area largely devoid of landscaping and they partially block views of the existing catering facility. On the other hand, the trees have put out horizontal roots that have damaged adjacent sidewalks. As part of site preparation the trees would be removed and subsequently replaced. While adverse, this impact is not considered significant because: (1) these are not native trees and they are not afforded protection by the City of Los Angeles Protected Tree Ordinance No. 177,404; (2) the trees' screening relevance would be diminished by the demolition of the existing unsightly catering facility; (3) elimination of the trees would permit repair of the damaged and unsightly sidewalks and curbs; and (4) since these trees are in the public right-of-way any/all removals and replacements would need to be permitted and executed per current Bureau of Street Services, Urban Forestry Division standards, which include specifications as to what size and type trees may be planted, how close trees can be placed to one another, how close to an intersection and driveway curb cuts trees

may be placed, etc., and require the final approval of the Board of Public Works<sup>1</sup>. It should also be noted that the preliminary landscape plan (refer to Figures III-6A and III-6B in Section III [Project Description]) for the Project provides for the on-site planting of approximately 31 trees from nursery stock in 36-inch and 48-inch box sizes along with other understory plantings and sod lawn areas.

Site preparation would also involve the demolition of the site's peripheral concrete block wall and the destruction of the Norwood Street School mural painted on the wall. Although this EIR makes no judgment regarding the artistic value of the mural, as a visibly prominent element with personal and possibly cultural interest to the community, the mural would appear to meet the above *L.A. City CEQA Threshold Guidelines* definition of an urban feature that may contribute to a valued aesthetic character or image. However, in keeping with a longstanding cultural tradition that promotes murals as a valued public art form, the School has a great number of other on-site murals that they maintain and are constantly adding to, often with the help of other community partners such as USC and the Empowerment Congress North Area Neighborhood Development Council. These on-site murals include an untitled mural by artist Bernard Heloua completed between 1991 and 1992 as part of the Great Walls Unlimited: Neighborhood Pride mural series<sup>2</sup>, and another that is on the block wall in front of the School directly across the street (see View 6 in the Historic Resource Report, Appendix IV.D), as well as works completed to celebrate the School's participation in the 2000 Democratic National Convention held in Los Angeles and the nationally recognized "Peace Games" program<sup>3</sup> in April of 2006 with the assistance of students from USC<sup>4</sup>. Therefore, as there are numerous other significant murals at the School site that would remain, including the one directly across the street, the impact of removing the mural at the Project site would be less than significant.

### ***Visual Character***

The Project would demolish the existing catering facility and would replace it with a modern residential condominium/townhouse complex. As a result, the broken sidewalks and curbs would be repaired and/or replaced and the washdown waters draining from the interior of the Project site would be eliminated, as would views of the catering facility and its unshielded night lighting. As such, the Project would improve the visual character or quality of the site.

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<sup>1</sup> Bureau of Street Services, Urban Forestry Division  
[http://www.lacity.org/boss/UrbanForestryDivision/index\\_requestremoval.htm](http://www.lacity.org/boss/UrbanForestryDivision/index_requestremoval.htm), accessed October 16, 2009

<sup>2</sup> [http://www.sparcmurals.org/sparcone/index.php?option=com\\_content&task=view&id=331&Itemid=101](http://www.sparcmurals.org/sparcone/index.php?option=com_content&task=view&id=331&Itemid=101), accessed October 21, 2009

<sup>3</sup> <http://www.peacegames.org/index.html>, accessed October 21, 2009

<sup>4</sup> [http://www.usc.edu/ext-relations/news\\_service/chronicle\\_pdf/2000.08.28.USC\\_Chronicle.pdf](http://www.usc.edu/ext-relations/news_service/chronicle_pdf/2000.08.28.USC_Chronicle.pdf) and [http://www.usc.edu/org/gpss/documents/Minutes/Minutes\\_20060403.pdf](http://www.usc.edu/org/gpss/documents/Minutes/Minutes_20060403.pdf), accessed October 21, 2009

Additionally, as discussed in detail in Section IV.D (Cultural Resources), in summary, the analysis of the Project's consistency with the University Park HPOZ Preservation Plan (the "Preservation Plan") finds that the Project complies with the vast majority of the Preservation Plan's guidelines. Although the Project is still in the preliminary design stage, and colors, materials, and architectural details have not yet been selected, the Project Applicant has indicated that every possible effort would be made to select colors, materials, and architectural details that are compatible with the adjacent contributing buildings. The two main aspects of the Project that do not comply with the Preservation Plan are the lot coverage of the four town home buildings and the set back of the two condominium buildings. The lot coverage of the four town home buildings is greater than the historical development pattern of the HPOZ. However, this is not obvious from the public right-of-way. The four town homes occupy a larger percentage of the lot than what is typical in the HPOZ because the building footprints extend into the rear yards. The set back of the two condominium buildings is greater than the guideline for Commercial/Industrial Design Infill because the code requirement is 15 feet for multi-family residential buildings. As such, the guideline is inconsistent with the code. The Project's design would be subject to the HPOZ Board design review and approval. Project details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines. Therefore, impacts related to visual character associated with the University Park HPOZ would be less than significant.

### ***Light and Glare***

The demolition of the existing catering facility would include removal of the high-intensity lighting fixtures on the Project site that currently illuminate the catering facility parking lot, which is currently a source of on-site glare. However, in the place of the existing lighting, the new Project would introduce numerous sources of new lighting, including landscape and security lighting, window glow and vehicle headlights. Thus, the Project has the potential to create new light trespass,<sup>5</sup> light pollution<sup>6</sup> and glare.<sup>7</sup>

As previously discussed, the Project site is located in an area with bright nighttime illumination, largely because of its proximity to downtown Los Angeles and the I-10 and SR 110, as well as the surrounding dense urbanization. Furthermore, the existing catering facility parking area is currently brightly illuminated with unshielded lighting. This existing lighting would be eliminated and replaced with more diffused residential lighting. In addition, the Project proposes a variety of lighting design features that comply with the Los Angeles Municipal Code (LAMC) to minimize the effect of the new sources of lighting that would be introduced. Consequently, no substantial changes in nighttime illumination are

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<sup>5</sup> *Light trespass occurs when unwanted light falls beyond the boundary of the area intended for illumination.*

<sup>6</sup> *Light pollution occurs when unnecessary light is directed upward toward the sky. Large amounts of light pollution can create "sky glow" in urban areas, adversely affecting nocturnal animals and migratory birds. Although sky glow is not harmful to humans, it does deprive residents of the opportunity to star gaze and can be a major concern in areas near astronomical observatories.*

<sup>7</sup> *Glare is caused by high contrast or a non-uniform distribution of luminance in the field of view. Glare can be discomforting and extreme glare can result in a loss of visibility.*

anticipated that would adversely affect nighttime views in the area. Thus, lighting impacts would be less than significant and mitigation measures are not required.

## **CUMULATIVE IMPACTS**

There are no related projects in the vicinity of the Project site that might combine with the Project to affect cumulatively scenic vistas, scenic resources, the existing visual character or quality of the Project site and/or its surroundings, or the University Park Historic District. In particular, none of the related projects are located within the University Park Historic District; therefore, the Project would not combine with any other project to cumulatively affect the Historic District.

As indicated on Figure III-9, the three closest related projects are No. 23 (includes 145 apartments at 2455 South Figueroa Street); No. 36 (includes 291 condominiums and 7,134 square feet of retail at 2100 South Figueroa Street); and No. 40 (includes a 450-student elementary school at 1700 West Pico Boulevard). Related Project No. 23 is located approximately 1.0 mile to the southeast of the Project site. Related Project No. 12 is located west of the I-10 overpass over Washington Boulevard. There is too much intervening urban development between this related project and the Project for the developments to be viewed together from nearby ground level locations. Related Project No. 36 is located approximately more than one-half mile southeast of the Project site, and Related Project No. 40 is located approximately 1.0 mile north of the Project site. Again, there is too much intervening urban development (including I-10 and SR 110 overpasses, respectively) between these related projects and the Project for the developments to be viewed together from nearby ground level locations. All the other related projects are located even farther from the Project site. Because the Project would not visually combine with any other known project, cumulative aesthetic impacts would be less than significant.

## **MITIGATION MEASURES**

No significant aesthetics impacts were identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- B-1: All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.
- B-2: Prior to the issuance of a grading permit, the Project Applicant shall submit a Landscape Plan prepared by a state-licensed landscape architect, demonstrating all street trees in the public right-of-way meet the requirements of the current Street Tree Division Standards.
- B-3: The proposed structure shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation, or other similar material, pursuant to LAMC Section 91.8104. B-4: The exterior of the proposed structure shall be

free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.

- B-5: The Project shall include low-level directional lighting, and all other outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.
- B-6: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.
- B-7: On-site signs shall be limited to the maximum allowable under the LAMC.
- B-8: Multiple temporary signs in the store windows and along the building walls shall not be permitted.

#### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to aesthetics would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### C. AIR QUALITY

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#### ENVIRONMENTAL SETTING

##### Introduction

This section evaluates the potential air quality impacts that could result from construction and operation of the proposed project. This includes the potential for the proposed project to conflict with or obstruct implementation of the applicable air quality plan, violate an air quality standard or contribute substantially to an existing or projected air quality violation, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people. Documents used in preparation of this section include the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook and the 1997 Air Quality Management Plan (AQMP), as amended, as well as federal and State regulations and guidelines. Finally, mitigation measures intended to reduce impacts to air quality are proposed, where appropriate.

##### Air Pollutants and Potential Health Effects

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality within the Air Basin. Both the federal and state governments have established ambient air quality standards for outdoor concentrations of these “criteria air pollutants” at levels considered safe to protect public health, including the health of “sensitive” populations, such as asthmatics, children, and the elderly, with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Air pollution studies have also shown an association between respiratory and other non-cancer health effects and proximity to major pollution sources such as freeways and high traffic roadways, rail yards, ports, refineries and gas stations that rises above the risks associated with regional air pollution in urban areas. Many of these studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California.<sup>1</sup>

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<sup>1</sup> California Air Resources Board, *Air Quality and Land Use Handbook*, April 2005



The criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb).<sup>2</sup> Toxic air contaminants (TACs) and greenhouse gas (GHG) emissions are also of concern in the Basin. The characteristics of each of these pollutants are briefly described below.

### **Criteria Pollutants**

- *Ozone* (O<sub>3</sub>) is a highly reactive and unstable gas that is formed when reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

Individuals exercising outdoors, children and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for O<sub>3</sub> effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O<sub>3</sub> levels are associated with increased school absences. In recent years, a correlation between elevated ambient O<sub>3</sub> levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high O<sub>3</sub> communities.

O<sub>3</sub> exposure under exercising conditions is known to increase the severity of the above-mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include O<sub>3</sub> may be more toxic than exposure to O<sub>3</sub> alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

- *Carbon Monoxide* (CO) is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O<sub>3</sub>, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

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<sup>2</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals that are chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

- *Nitrogen dioxide* (NO<sub>2</sub>) is a byproduct produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Nitrogen dioxide absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. Nitrogen dioxide also contributes to the formation of PM<sub>10</sub>.

Major sources of nitrogen oxides include power plants, large industrial facilities, and motor vehicles. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. Nitrogen oxides are also a precursor to the formation of ozone.

In January 2010, the United States Environmental Protection Agency set a new 1-hour nitrogen dioxide standard at 0.10 parts per million (188 micrograms per cubic meter).<sup>3</sup> The United States Environmental Protection Agency cited evidence that short-term nitrogen dioxide exposures could contribute to adverse respiratory effects including increased asthma symptoms, worsened control of asthma, and an increase in respiratory illnesses and symptoms. The United States Environmental Protection Agency also identified that nitrogen dioxide concentrations on or near major roads can be approximately 30 to 100 percent higher than concentrations in the surrounding community, which could contribute to health effects for at-risk populations, including people with asthma, children, and the elderly.

- *Respirable Particulate Matter* (PM<sub>10</sub>) and *Fine Particulate Matter* (PM<sub>2.5</sub>) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively.

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<sup>3</sup> U.S. EPA, *Final Revisions to the Primary National Ambient Air Quality Standard for Nitrogen Dioxide (NO<sub>2</sub>)*, General Overview, Office of Air and Radiation Office of Air Quality Planning and Standards, January 2010, p. 11-12.

Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products; abrasion of tires and brakes; and construction activities.

The human body naturally prevents the entry of larger particles into the body. However,  $PM_{10}$  and even smaller  $PM_{2.5}$  can become trapped in the nose, throat, and upper respiratory tract.  $PM_{10}$  may accumulate in the lungs and irritate the respiratory tract, and may also lead to eye irritation, but fine particles ( $PM_{2.5}$ ) are more likely than larger  $PM_{10}$  particles to contribute to health effects.

A consistent correlation between elevated ambient  $PM_{10}$  and  $PM_{2.5}$  levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the U.S. and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life span, and an increased mortality from lung cancer.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of  $PM_{10}$  and  $PM_{2.5}$ . Daily fluctuations in  $PM_{10}$  and  $PM_{2.5}$  concentration levels have been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

- *Sulfur dioxide* ( $SO_2$ ) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When  $SO_2$  oxidizes in the atmosphere, it forms sulfates ( $SO_4$ ). Collectively, these pollutants are referred to as sulfur oxides ( $SO_x$ ).

A few minutes exposure to low levels of  $SO_2$  can result in airway constriction in some asthmatics, all of who are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to  $SO_2$ . In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of  $SO_2$ .

Animal studies suggest that despite  $SO_2$  being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Most of the health effects associated with fine particles and  $SO_2$  at ambient levels are also associated with  $SO_4$ . Thus, both mortality and morbidity effects have been observed with an increase in ambient  $SO_4$  concentrations. However, efforts to separate the effects of  $SO_4$  from the effects of other pollutants have generally not been successful.

- *Lead (Pb)* occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne Pb in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles such as racecars. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, Pb is present in many urban soils and can be re-suspended in the air. Other sources of Pb include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.

Pb can be stored in the bone from early-age environmental exposure, and elevated blood Pb levels can occur due to the breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland), and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental lead exposure of their mothers.

Pb poisoning can cause anemia, lethargy, seizures and death. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence levels. In adults, increased Pb levels are associated with increased blood pressure.

### ***Toxic Air Contaminants (TACs)***

Toxic Air Contaminants refer to a diverse group of air pollutants that include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are typically found in low concentrations in ambient air, especially in urban areas. TACs are different than “criteria” pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis. TACs are regulated at the regional, state, and federal level, however, because chronic exposure can result in adverse health effects.

TACs are known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects from TACs may be both chronic (i.e., of long duration) and acute (i.e., severe but of short duration) on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which requires a period of 10 to 30 years after exposure to develop.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board (ARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals

in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the ARB, and are listed as carcinogens either under the state's Proposition 65 or under the federal Hazardous Air Pollutants programs. The U.S. Environmental Protection Agency (EPA) has adopted Ultra Low Sulfur Diesel (ULSD) fuel standards that went into effect in June 2006 in an effort to reduce diesel particulate matter substantially. As of June 1, 2006, refiners and importers nationwide have been required by the EPA to ensure that at least 80 percent of the volume of the highway diesel fuel they produce or import would be ULSD-compliant. As of December 10, 2010, only ULSD fuel is available for highway use nationwide. In California, which was an early adopter of ULSD fuel and engine technologies, 100 percent of the diesel fuel sold – downstream from refineries, up to and including fuel terminals that store diesel fuel – was ULSD fuel since July 15, 2006. Since September 1, 2006, all diesel fuel offered for sale at retail outlets in California has been ULSD fuel.

## **Regulatory Framework**

### ***Federal***

#### *Federal Clean Air Act (CAA)*

The federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The CAA also mandates that the state submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. NAAQS have been established for ozone, carbon monoxide, nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>, and lead (Pb). These pollutants are called “criteria” air pollutants because standards have been established for each of them to meet specific public health and welfare criteria.

To protect human health and the environment, the USEPA has set “primary” and “secondary” maximum ambient thresholds for each of the criteria pollutants. Primary thresholds were set to protect human health with a margin of safety, particularly for sensitive receptors such as children, the elderly, and individuals suffering from chronic lung conditions such as asthma and emphysema. Secondary standards were set to protect the natural environment and prevent further deterioration of animals, crops, vegetation, and buildings.

The NAAQS are defined as the maximum acceptable concentration that may be reached, but not exceeded more than once per year. California has adopted more stringent ambient air quality standards for most of the criteria air pollutants. Table IV.C-1 presents both sets of ambient air quality standards (i.e., national and State) and the Basin's attainment status for each standard.

**Table IV.C-1  
Ambient Air Quality Standards and Attainment Status  
for the South Coast Air Basin (Los Angeles County Portion)**

Air Pollutant	Averaging Time	State Standard	Federal Standard	SCAQMD Attainment Status	
				California Standard	Federal Primary Standard
Ozone (O <sub>3</sub> )	1 Hour	0.09 ppm	Revoked <sup>a</sup>	Non-attainment (extreme)	Non-attainment
	8 Hour	0.070 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 Hour	20.0 ppm	35.0 ppm	Attainment	Attainment
	8 Hour	9.0 ppm	9.0 ppm		
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.18 ppm	0.10 ppm	Non-attainment	Attainment
	Annual	0.03 ppm	.053 ppm		
Lead (Pb)	30 Day Ave	1.5 µg/m <sup>3</sup>	--	Non-attainment	Non-Attainment
	Calendar Qtr	--	1.5 µg/m <sup>3</sup>		
Sulfur Dioxide (SO <sub>2</sub> )	1 Hour	0.25 ppm	0.075 ppm	Attainment	Attainment
	24 Hour	0.04 ppm	0.14 ppm (for certain areas)		
Particulate Matter 10 (PM <sub>10</sub> )	24 Hour	50.0 µg/m <sup>3</sup>	150.0 µg/m <sup>3</sup>	Non-attainment	Non-attainment
	Annual	20.0 µg/m <sup>3</sup>	Revoked <sup>b</sup>		
Particulate Matter 2.5 (PM <sub>2.5</sub> )	24 Hour	--	35.0 µg/m <sup>3</sup>	Non-attainment	Non-attainment
	Annual	12.0 µg/m <sup>3</sup>	15.0 µg/m <sup>3</sup>		
<i>Notes: ppm = parts by volume per million of air µg/m<sup>3</sup>=micrograms per cubic meter</i> <i><sup>a</sup> The Federal 1-hour ozone standard was revoked and replaced by the 8-hour average ozone standard effective June 15, 2005. U.S. EPA has revised the federal 8-hour ozone standard from 0.084 ppm to 0.075 ppm, effective May 27, 2008.</i> <i><sup>b</sup> The Federal annual PM<sub>10</sub> standard (AAM &gt; 50 µg/m<sup>3</sup>) was revoked effective December 17, 2006. State standard is annual average (AAM) &gt; 20 µg/m<sup>3</sup>.</i> <i>Sources: California Air Resources Board, Ambient Air Quality Standards, June 7, 2012, website: <a href="http://www.arb.ca.gov/research/aaqs/aaqs2.pdf">http://www.arb.ca.gov/research/aaqs/aaqs2.pdf</a></i> <i>California Air Resources Board, State Area Designation Maps, 2012, website: <a href="http://www.arb.ca.gov/desig/adm/adm.htm">http://www.arb.ca.gov/desig/adm/adm.htm</a></i>					

As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

### **State**

#### *California Clean Air Act (CCAA)*

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and have set standards for

other pollutants recognized by the state. In general, the California standards are more health protective than the corresponding NAAQS. California has also set standards for PM<sub>2.5</sub>, sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles. The Air Resources Board (ARB), a part of the California Environmental Protection Agency (Cal/EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the ARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. The ARB also sets fuel specifications to further reduce vehicular emissions.

### *Off-Road Diesel Engines*

Off-road diesel vehicles, which include construction equipment, are also regulated by the ARB for both in-use (existing) and new engines. There have been four sets of standards implemented by the ARB for new off-road diesel engines, known as Tiers. Tier 1 standards began in 1996. Tier 2 and 3 were adopted in 2000 and were more stringent than the first tier. Tier 2 and 3 standards were completely phased in by 2006 and 2008, respectively. On December 9, 2004, the ARB adopted the Tier 4 or fourth phase of emission standards for late model year engines. These emission standards are nearly identical to those finalized by the EPA in May 2004. These standards decrease particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and NO<sub>x</sub> emissions from off-road diesel engines to 90 percent below pre-2011 levels.

Since off-road vehicles used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have up-to-date emission controls. As such, the ARB approved, on July 26, 2007, a regulation to reduce emission from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation was approved by the OAL on May 16, 2008 and came effective on June 15, 2008. This regulation includes an idling limit of five minutes for all off-road vehicles 25 horsepower and up. The regulation also establishes emission rate targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. The regulation took effect on the larger fleets first with average compliance dates in 2010, while medium and small fleet requirements will achieve compliance in 2013 and 2015, respectively. This regulation also includes the Surplus Off-Road Opt-in for NO<sub>x</sub> (SOON) program. The local air districts may opt into the SOON program to reduce NO<sub>x</sub> emissions beyond what is required by the regulation. Staff at the SCAQMD proposed Rule 2449, which will implement the SOON program. This rule was adopted at the May 2, 2008 board meeting. Opting into this program is anticipated to achieve a daily 12-ton reduction in NO<sub>x</sub> by 2014.

### ***Regional***

#### *Southern California Association of Governments (SCAG)*

The Southern California Association of Governments (SCAG) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is a regional planning

agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment.

#### 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As such, the 2012–2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero emission transportation technologies in the 2023–2035 time frame and clear steps to move toward this objective. This is especially critical for our goods movement system. The development of a world-class zero- or near-zero emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2012–2035 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG reduction, and economic development.

#### Regional Comprehensive Plan (RCP)

Although SCAG is not an air quality management agency, SCAG is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) is a major advisory plan prepared by SCAG that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance. The RCP presents a vision of how Southern California can balance resource conservation, economic vitality, and quality of life. The RCP identifies voluntary best practices to approach growth and infrastructure challenges in an integrated and comprehensive way. It also includes goals and outcomes to measure progress toward a more sustainable region. Through extensive outreach and input from the RCP Task Force, SCAG's Policy Committees, local governments and other key stakeholders, the RCP is a collaborative effort to address the region's challenges and set a path forward.

#### *South Coast Air Quality Management Division (SCAQMD)*

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions and local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary.



### 2007 Air Quality Management Plan (AQMP)

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and state ambient air quality standards. SCAQMD has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The Governing Board of the SCAQMD adopted the most recent of these plans on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and state Clean Air Acts, amendments and air quality standards, to accommodate growth, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2007 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2007 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population, housing, and employment growth identified by SCAG in its applicable Regional Transportation Plan (RTP). The 2007 AQMP also assumes that general development projects will include feasible strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations that are designed to address air quality impacts and pollution control measures. General development projects would be affected by applicable rules and regulations – if any – that are adopted as a result of the 2007 AQMP.

### CEQA Air Quality Handbook

Although the SCAQMD is responsible for regional air quality planning efforts, SCAQMD does not have the authority to directly regulate the air quality issues associated with plans and new development projects within the Basin. Instead, the SCAQMD has prepared the CEQA Air Quality Handbook to assist Lead Agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin. Published in 1993, the SCAQMD is currently in the process of updating their Air Quality Handbook. While the complete update is not yet available, they have revised the air quality significance thresholds, and a new procedure referred to as “localized significance thresholds,” has been added.

### ***Local***

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the 2007 AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

### *General Plan*

The Air Quality Element of the *City of Los Angeles General Plan* (the “*General Plan*”) was adopted on November 24, 1992 and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county, and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area’s residents are crucial to the achievement of state and federal air quality standards.

The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City’s mobility and clean air goals. Mutually reinforcing strategies need to be developed that work to reduce the use of single occupant vehicles and that work to reduce vehicle trips and vehicle miles traveled (VMT).

The Air Quality Element establishes the following six goals:

1. Good air quality in an environment of continued population growth and healthy economic structure;
2. Less reliance on single-occupant vehicles with fewer commute and non-work trips;
3. Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
4. Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
6. Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

### *City of Los Angeles Green Building Code*

In order to further implement the LA Green Plan’s goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects. Accompanying the first of these ordinances, the City Planning Department’s Recommendation Report<sup>4</sup> summarized how green building

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<sup>4</sup> *Los Angeles Department of City Planning Recommendation Report, a proposed ordinance amending the Los Angeles Municipal Code to establish a Green Building Program which shall include a Standard of Sustainability and Standard of Sustainable Excellence, November 15, 2007, CPC-2007-4749-CA, Jane Blumenfeld, Principal City Planner, and Claire Brown, AICP, Project Manager.*

techniques establish a means to tackle a variety of sustainability issues as outlined in the LA Green Plan. Specifically, part of the report states:

*Green building is increasingly being used as a tool by local governments to reduce the environmental impact of building projects in a structured and quantifiable fashion. Municipalities across the country, including Los Angeles, have established policies to build public facilities to green building standards. An increasing number have begun to implement policies that encourage and/or require private sector developments to be built to green building standards. Additionally, statewide efforts are underway to develop green building codes. Furthermore, the recently adopted California Global Warming Solutions Act of 2006 (AB 32) is likely to place increased emphasis on carbon emissions reductions and avoidance. These trends and efforts speak to the importance of the City establishing local guidance and demonstrating leadership on green building within Los Angeles.*

Below is a brief summary of the history of the City's green building ordinances, including the currently applicable Los Angeles Green Building Code.

On April 22, 2008, the Los Angeles City Council approved Ordinance No. 179820 (the LA Green Building Ordinance). The goal of the LA Green Building Ordinance is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems. To achieve these goals, it must be demonstrated that certain projects in the City meet the intent of the criteria for certification at the Leadership in Energy and Environmental Design (LEED®) certified level.

On December 15, 2010, the Los Angeles City Council approved Ordinance No. 181479, amending Sections 12.03, 12.07, 12.07.01, 12.07.1, 12.08, 16.10, and 16.11 of the Los Angeles Municipal Code (LAMC) to sunset, modify and/or transfer oversight of green building-related programs in order to streamline case processing in light of the California Green Building Standards Code anticipated to take effect on January 1, 2011. Specifically, as it relates to the original Green Building Ordinance 179820, references to the U.S. Green Building Council's (USGBC) LEED® Certification at the Silver level or higher described in Subsection E shall no longer apply to projects filed on or after January 1, 2011. Projects filed on or after January 1, 2011 must satisfy the LA Green Building Ordinance, as defined in Los Angeles Municipal Code Section 99.01.101.1, Tier 1 or higher in order to obtain expedited processing as described in Subsection 5.

Also on December 15, 2010, the Los Angeles City Council approved Ordinance No. 181480, which incorporates various provisions of the 2010 CALGreen Code into the LAMC. Specifically, these regulations are now known as the Los Angeles Green Building Code. This code is Article 9 of a total of nine Articles of Chapter IX of the LAMC and adopts by reference the CALGreen Code except as amended therein. The provisions of the Los Angeles Green Building Code apply to the construction of every new building, every building alteration with a building permit valuation of over \$200,000, and every building addition, unless otherwise indicated in the code, throughout the City of Los Angeles.

Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings.

## **Existing Conditions**

### ***Existing Regional Air Quality***

The Project site is located within the South Coast Air Basin (the “Basin”), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys below. This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is influenced primarily by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, industry and meteorology.

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produces electricity or generates heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbecue lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. The most current average daily emissions inventory for the entire Basin and the Los Angeles County portion of the Basin is summarized on Table IV.C-2.<sup>5</sup> As shown, exhaust emissions from mobile sources generate the majority of ROG, CO, NO<sub>x</sub>, and SO<sub>x</sub> in the Basin and the Los Angeles County portion of the Basin. Area-wide sources generate the most airborne particulates (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>) in both the Basin and Los Angeles County.

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<sup>5</sup> The estimated annual average emissions for 2008 are the most recent data provided by the ARB.

**Table IV.C-2**  
**2008 Estimated Average Daily Regional Emissions**

Emissions Source	Emissions in Tons per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>South Coast Air Basin</b>						
Stationary (Point) Sources	107.0	56.0	48.1	16.1	24.0	15.4
Area-wide Sources	142.6	25.8	111.3	0.9	214.9	52.1
Mobile Sources	361.6	738.2	3,090.0	21.0	43.4	34.4
Natural (non-anthropogenic) Sources	86.5	5.0	164.2	1.5	16.6	14.1
Total Emissions	697.7	825.0	3,413.6	39.5	298.9	116.0
<b>Los Angeles County – South Coast Air Basin</b>						
Stationary (Point) Sources	67.3	39.1	36.5	14.5	24.7	12.3
Area-wide Sources	86.9	15.9	50.8	0.4	134.9	30.5
Mobile Sources	219.7	504.3	1,870.8	33.1	29.4	23.9
Natural (non-anthropogenic) Sources	40.5	1.9	65.0	0.6	6.6	5.6
Total Emissions	414.4	561.2	2,023.1	48.6	195.6	72.3
Sources: California Air Resources Board, 2009 Almanac Emission Projection Data, website: <a href="http://www.arb.ca.gov/ei/emissiondata.htm">http://www.arb.ca.gov/ei/emissiondata.htm</a> , accessed May 23, 2013. See Appendix IV.C, pages 72-76.						

Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the ARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with federal and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant exceeds the standard, the area is classified as a “non-attainment” area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.”

The U.S. EPA and the ARB use different standards for determining whether the Basin is in attainment. Federal and state standards have been summarized above in Table IV.C-1, along with the current attainment status for the Los Angeles County portion of the Basin.

### ***Existing Local Air Quality***

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Project Site is located within SRA 1, which covers the Central Los Angeles area. SCAQMD Station No. 087 (Los Angeles-North Main Street) collects ambient air quality data for SRA 1. This station has available emission levels of O<sub>3</sub> (1-hour and 8-hour), CO (1-hour for 2010 only and 8-hour for 2010-2012), NO<sub>2</sub> (1-hour and annual average), SO<sub>2</sub> (1-hour and 24-hour), PM<sub>10</sub> (24-hour and annual), PM<sub>2.5</sub> (24-hour and annual), Particulates TSP (2010 and 2011 only), Lead (2010 and 2011 only), and Sulfate (2010 and 2011 only). Table IV.C-3 identifies the national and state ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured at the SCAQMD Station No. 087 from 2010 to 2012.

**Table IV.C-3**  
**Summary of Ambient Air Quality in the Project Site Vicinity**

Air Pollutants Monitored Within SRA 1—Central Los Angeles Area	Year		
	2010	2011	2012
<b>Ozone (O<sub>3</sub>)</b>			
Maximum 1-hour concentration measured	0.098 ppm	0.087 ppm	0.133 ppm
Number of days exceeding state 0.09 ppm 1-hour standard	1	0	1
Maximum 8-hour concentration measured	0.080 ppm	0.065 ppm	0.077 ppm
Number of days exceeding federal 0.075 ppm 8-hour standard	1	0	1
Number of days exceeding state 0.07 ppm 8-hour standard	1	0	2
<b>Respirable Particulate Matter (PM<sub>10</sub>)</b>			
Maximum 24-hour concentration measured	42.0 µg/m <sup>3</sup>	53.0 µg/m <sup>3</sup>	80.0 µg/m <sup>3</sup>
Number of days exceeding federal 150 µg/m <sup>3</sup> 24-hour standard	0	0	0
Number of days exceeding state 50 µg/m <sup>3</sup> 24-hour standard	0	9	43
Annual Arithmetic Mean (AAM)	27.1 µg/m <sup>3</sup>	29.0 µg/m <sup>3</sup>	30.2 µg/m <sup>3</sup>
Does measured AAM exceed state 20 µg/m <sup>3</sup> AAM standard?	Yes	Yes	Yes
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>			
Maximum 24-hour concentration measured	48.6 µg/m <sup>3</sup>	69.2 µg/m <sup>3</sup>	58.7 µg/m <sup>3</sup>
Number of days exceeding federal 35.0 µg/m <sup>3</sup> 24-hour standard	5	7	4
Annual Arithmetic Mean (AAM)	12.6 µg/m <sup>3</sup>	13.5 µg/m <sup>3</sup>	13.1 µg/m <sup>3</sup>
Does measured AAM exceed federal 15 µg/m <sup>3</sup> AAM standard?	Yes	No	No
Does measured AAM exceed state 12 µg/m <sup>3</sup> AAM standard?	Yes	Yes	Yes
<b>Carbon Monoxide (CO)</b>			
Maximum 1-hour concentration measured	3.0 ppm	n/a	n/a
Maximum 8-hour concentration measured	2.3 ppm	2.4 ppm	1.9 ppm
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>			
Maximum 1-hour concentration measured	0.089 ppm	0.110 ppm	0.069 ppm
Annual average	0.025 ppm	0.023 ppm	n/a
Does measured annual average exceed federal 0.0534 ppm annual average standard?	No	No	--
Does measured annual average exceed state 0.030 ppm annual average standard?	No	No	--
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>			
Maximum 1-hour concentration measured	0.0098 ppm	0.0198 ppm	n/a
Maximum 24-hour concentration measured	0.002 ppm	0.002 ppm	0.002 ppm
<b>Particulates TSP</b>			
Maximum 24-hour concentration measured	105 µg/m <sup>3</sup>	84 µg/m <sup>3</sup>	n/a
Annual Arithmetic Mean (AAM)	53.3 µg/m <sup>3</sup>	53.7 µg/m <sup>3</sup>	n/a
<b>Lead</b>			
Maximum Monthly Average	0.02 µg/m <sup>3</sup>	0.012 µg/m <sup>3</sup>	n/a
Maximum Quarterly Average	0.01 µg/m <sup>3</sup>	0.011 µg/m <sup>3</sup>	n/a
<b>Sulfate</b>			
Maximum 24-hour concentration measured	9.1 µg/m <sup>3</sup>	8.0 µg/m <sup>3</sup>	n/a
Number of days exceeding state standard of 25 µg/m <sup>3</sup>	0	0	0
Note: ppm = parts by volume per million of air. µg/m <sup>3</sup> = micrograms per cubic meter. n/a = data not available or not collected by the ARB/District. Sources: State of California, Air Resources Board and SCAQMD Historical Data by Year, websites: <a href="http://www.arb.ca.gov/adam/topfour/topfour1.php">http://www.arb.ca.gov/adam/topfour/topfour1.php</a> ; and <a href="http://www.aqmd.gov/smog/historicaldata.htm">http://www.aqmd.gov/smog/historicaldata.htm</a> , accessed May 2013. See Appendix IV.C pages 77-90.			

### ***Existing Air Pollutant Emissions in Local Vicinity***

Air pollutant emissions are generated in the local vicinity of the Project site by stationary and area-wide sources including consumer products, space and water heating, and landscape maintenance from leaf blowers and lawn mowers. Mobile sources, primarily automobile traffic, are also contributors of local air pollutant emissions. None of the existing uses surrounding the Project site involve industrial or manufacturing processes that would result in the release of toxic air emissions. Overall, motor vehicles are the primary source of pollutants in the Project site vicinity.

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO “hotspots.” The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest off-site sensitive receptors to the Project site potentially subject to localized air quality impacts associated with construction of the Project include:<sup>6</sup>

- The Norwood Street Elementary School located approximately 64 feet east of the Project site, across Oak Street;
- The Norwood Street Children’s Center located approximately 64 feet east of the Project, across Oak Street;
- The single-family residences located south of the Project site, across 20<sup>th</sup> Street, with the nearest residence located approximately 55 feet away from the Project site;
- The one-story commercial building located immediately adjacent to the west of the Project site boundary;
- The single-family residences located west of the Project site, with the nearest residence located approximately 204 feet away from the Project site;
- The Downtown Value School located approximately 292 feet west of the Project site;
- The commercial building and abandoned two-story church building located approximately 103 feet north of the Project site, across Washington Boulevard; and

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<sup>6</sup> The off-site receptors evaluated in this localized air quality impacts analysis includes the existing surrounding commercial uses because, as discussed herein, LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, should be applied to receptors such as industrial or commercial facilities based on the SCAQMD’s recommendation.

- The Casa Camino Real Building located approximately 167 feet northeast of the Project site, across Washington Boulevard.

The SCAQMD recommends the use of the CALINE4 dispersion model to estimate the potential for CO hot spots. CALINE4 is an effective tool for forecasting free-flowing mobile source emissions resulting from a proposed project. For this analysis, localized CO concentrations were calculated based on a simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District and accepted by the SCAQMD. The simplified procedure is intended as a screening analysis, which identifies a potential CO hotspot. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations. The emission factors used in the analysis have been updated to EMFAC2007. Using the simplified CALINE4 screening procedure described above, the maximum 1-hour and 8-hour CO concentrations were calculated for eight study intersections evaluated in the traffic report for the Project (see Appendix IV.L to this Draft EIR). The results of these calculations are presented on Table IV.C-4 for representative receptors located at each roadway edge as well as at 25, 50, and 100 feet from each roadway. The distances of 25, 50, and 100 feet from each roadway were selected because they represent locations where a person may be living or working for more than eight hours at a time. The federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm. The 8-hour federal and state standards for localized CO concentrations are 9.0 ppm. These standards and applicable thresholds of significance are provided in Table IV.C-6, SCAQMD Air Quality Significance Thresholds, later in this section. As shown in Table IV.C-4 below, none of the federal or state standards are exceeded under existing conditions.

**Table IV.C-4**  
**Existing Localized Carbon Monoxide Concentrations**

Intersection	CO Concentrations in Parts per Million <sup>a</sup>							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Union Avenue and Washington Boulevard	4.4	3.2	3.9	2.8	3.7	2.7	3.5	2.6
Union Avenue and 23 <sup>rd</sup> Street	3.7	2.7	3.4	2.5	3.3	2.4	3.2	2.3
Toberman Street and 18 <sup>th</sup> Street – Harbor Freeway SB Off-Ramp	3.3	2.4	3.2	2.3	3.1	2.3	3.1	2.3
Harbor Freeway SB On-Ramp and Washington Boulevard	5.1	3.7	4.3	3.1	4.1	3.0	3.8	2.7
Oak Street and Washington Boulevard	4.1	3.0	3.7	2.7	3.6	2.6	3.4	2.5
Oak Street-Scarff Street and 23 <sup>rd</sup> Street	3.6	2.6	3.3	2.4	3.3	2.4	3.2	2.3
Figueroa Street and Washington Boulevard	4.7	3.4	4.2	3.0	3.9	2.9	3.7	2.7
Figueroa Street and 23 <sup>rd</sup> Street	4.5	3.2	4.0	2.9	3.8	2.7	3.6	2.6
<sup>a</sup> The federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm. National and state 8-hour standards are 9.0 ppm. See Table IV.C-6 herein. Traffic Information Source: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Oak Village Residences Project, July 14, 2009. Source: CAJA Environmental Services, 2011. Calculation data and results are provided in Appendix IV.C, pages 62-69.								



## Existing Site Emissions

The Project site is currently comprised of 10 separate parcels totaling approximately 2.03-acres. Development on the Project site consists of a one-story commercial catering facility and an associated surface parking lot. Air pollutant emissions are generated at the Project site by stationary sources, such as space and water heating and architectural coatings (painting), and mobile vehicle traffic traveling to and from the site. The average daily emissions generated by the existing uses at the Project site have been estimated utilizing the California Emissions Estimator Model (CalEEMod) computer model recommended by the SCAQMD. The results of these calculations are shown on Table IV.C-5. Currently, the operational emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> at the Project site do not exceed the SCAQMD thresholds for operational emissions associated with these pollutants. As shown on Table IV.C-5, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project site.

**Table IV.C-5**  
**Existing Daily Operational Emissions at Project Site**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Natural Gas Usage	0.00	0.04	0.03	0.00	0.00	0.00
Architectural Coating	0.08	-	-	-	-	-
Consumer Products	0.24	-	-	-	-	-
Motor Vehicles	2.65	6.63	27.61	0.03	3.94	0.37
<b>Total Emissions</b>	<b>2.97</b>	<b>6.67</b>	<b>27.64</b>	<b>0.03</b>	<b>3.94</b>	<b>0.37</b>
<b>Wintertime (Non-Smog Season) Emissions</b>						
Natural Gas Usage	0.00	0.04	0.03	0.00	0.00	0.00
Architectural Coating	0.08	-	-	-	-	-
Consumer Products	0.24	-	-	-	-	-
Motor Vehicles	2.85	7.23	27.31	0.03	3.94	0.37
<b>Total Emissions</b>	<b>3.17</b>	<b>7.24</b>	<b>27.34</b>	<b>0.03</b>	<b>3.94</b>	<b>0.37</b>
<i>Source: Parker Environmental Consultants, September 2012. Calculation data are provided in Appendix IV.C, pages 1-14.</i>						

## ENVIRONMENTAL IMPACTS

### Methodology

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the Project. Air pollutant emissions associated with the Project would result from Project operations and from Project-related traffic volumes. Construction activities would also generate air pollutant emissions at the Project Site and on roadways resulting from construction-related traffic. The net increase in Project Site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance recommended by the SCAQMD (see Project Impacts subheading, below).

### ***Construction Emissions***

The regional construction emissions associated with the Project were calculated using the California Emissions Estimator Model (CalEEMod Version 2011.1.1). CalEEMod was developed in collaboration with the air districts of California as a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. CalEEMod provides several improvements compared to URBEMIS 2007, including but not limited to the latest factors, survey data, and calculation methodologies for criteria pollutants and GHGs. While both models are supported by the SCAQMD, the impact analysis and conclusions for the Project have been based on the results from CalEEMod.

Construction activities associated with demolition, site preparation, grading, and building construction would generate pollutant emissions. Specifically, these construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. These construction emissions were compared to the thresholds established by the SCAQMD as shown in Table IV.C-6, SCAQMD Air Quality Significance Thresholds. It was assumed that all of the construction equipment used would be diesel-powered.

In addition to the SCAQMD's regional significance thresholds, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants (see Table IV.C-6). To minimize the need for detailed air quality modeling to assess localized impacts, SCAQMD developed mass-based localized significance thresholds (LSTs) that are the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,<sup>7</sup> apply to projects that are less than, or equal to, five acres in size and are only applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. In terms of NO<sub>x</sub> emissions, the two principal species of NO<sub>x</sub> are nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>), with the vast majority (95 percent) of the NO<sub>x</sub> emissions being comprised of NO. However, because adverse health effects are associated with NO<sub>2</sub>, the analysis of localized air quality impacts associated with NO<sub>x</sub> emissions is focused on NO<sub>2</sub> levels. NO is converted to NO<sub>2</sub> by several processes, the two most important of which are (1) the reaction of NO with ozone, and (2) the photochemical reaction of NO with hydrocarbons. When modeling NO<sub>2</sub> emissions from combustion sources, the SCAQMD assumes that the conversion of NO to NO<sub>2</sub> is complete at a distance of 5,000 meters from the

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<sup>7</sup> SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008.

source. For PM<sub>10</sub> LSTs, the thresholds were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM<sub>2.5</sub> LSTs, the thresholds were derived based on a general ratio of PM<sub>2.5</sub> to PM<sub>10</sub> for both fugitive dust and combustion emissions.

The Project Site is approximately 2.03 acres in size and thus the maximum daily construction area for each phase would not exceed five acres. As described in more detail below, the resulting on-site construction emissions generated for each construction phase were analyzed against the applicable LST for each phase.

The SCAQMD considers a sensitive receptor to be a receptor where it is possible that an individual could remain for 24 hours. Thus, according to the SCAQMD, the LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Additionally, since a sensitive receptor is considered to be present onsite for 24 hours, LSTs based on shorter averaging times, such as the one-hour NO<sub>2</sub> or the 1-hour and 8-hour CO ambient air quality standards, would also apply when evaluating localized air quality impacts on sensitive receptors. However, LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, are applied to receptors such as industrial or commercial facilities since it is reasonable to assume that workers at these sites could be present for periods of one to eight hours.<sup>8</sup> Therefore, this analysis evaluates localized air quality impacts from construction activities associated with the Project on sensitive receptors for NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, and on “non-sensitive” receptors (e.g., industrial or commercial facilities) for NO<sub>2</sub> and CO.

### ***Operational Emissions***

Operational emissions associated with the Project were calculated using CalEEMod Version 2011.1.1 and the information provided in the traffic study prepared for the Project. Operational emissions associated with the Project would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if a regional air quality impact would occur, the increase in emissions would be compared with the SCAQMD’s recommended regional thresholds for operational emissions as shown in Table IV.C-6, below.

As discussed above, the SCAQMD has developed LSTs that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. However, because the LST methodology is applicable to projects where emission sources occupy a fixed location, LST methodology would typically not apply to the operational phase of this Project because emissions are primarily generated by mobile sources traveling on local roadways over potentially large distances or areas. LSTs would apply to the operational phase of a project, if the

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<sup>8</sup> *Ibid.*

project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology could apply to operational projects such as warehouse/transfer facilities.<sup>9</sup> As the Project would include a residential development, an operational analysis against the LST methodology is not applicable and thus has not been included in this analysis.

### ***Localized CO Concentrations***

Localized CO concentrations were calculated for the study intersections analyzed in the traffic report for the Project based on the simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District and accepted by the SCAQMD. The simplified model is intended as a screening analysis, which identifies a potential CO hotspot. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations. The emission factors used in the simplified CALINE4 model are based on EMFAC2007. The resulting emissions were compared with adopted national and state ambient air quality standards.

### **Thresholds of Significance**

#### ***CEQA Guidelines***

In accordance with Appendix G to the *CEQA Guidelines*, a project could have a significant air quality impact if the project would do any of the following:

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

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any impacts related to issue “e.” Thus, no further analysis of this issue is required.

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<sup>9</sup> SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, February 2005, page 1-3.

### ***City of Los Angeles CEQA Thresholds Guide***

The *L.A. CEQA Thresholds Guide* does not include specific citywide significance thresholds for air quality, but instead relies on significance thresholds identified by the SCAQMD in its *CEQA Air Quality Handbook* (SCAQMD CEQA Handbook) as revised in November 1993 and approved by the SCAQMD's Board of Directors. Thus, construction and operational emissions associated with the Project would be significant if:

#### ***Construction Emissions***

- Construction emissions exceed the SCAQMD thresholds shown in Table IV.C-6 below.

#### ***Operational Emissions***

- Operational emissions exceed the SCAQMD thresholds shown in Table IV.C-6 below.
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The 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.<sup>10</sup>
- The project creates an objectionable odor at the nearest sensitive receptor.

Furthermore, as set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance of a project with respect to toxic air contaminants shall be made on a case-by-case basis, considering the following factors:

#### ***Toxic Air Contaminants***

- A. The regulatory framework for the toxic material(s) and process(es) involved;
- B. The proximity of the toxic air contaminants to sensitive receptors;
- C. The quantity, volume and toxicity of the contaminants expected to be emitted;
- D. The likelihood and potential level of exposure; and

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<sup>10</sup> This threshold is not listed in Table IV.C-6 but instead comes from page B.2-5 of the *City Thresholds Guide*, Air Quality section, <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.

- E. The degree to which project design will reduce the risk of exposure.

### ***Consistency with the Applicable AQMP***

The SCAQMD has adopted criteria for consistency with regional plans and the regional AQMP in its CEQA Air Quality Handbook. Specifically, the indicators of consistency are: 1) whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations; and 2) whether the project would exceed the assumptions utilized in preparing the AQMP.

### ***Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations***

As the agency principally responsible for comprehensive air pollution control in the Basin, the SCAQMD recommends that projects should be evaluated in terms of air pollution control thresholds established by the SCAQMD and published in the CEQA Air Quality Handbook. These thresholds were developed by the SCAQMD to provide quantifiable levels to which projects can be compared. The most current significance thresholds are shown in Table IV.C-6 and are used in this analysis.

### ***Cumulatively Considerable Net Increase of Criteria Pollutants***

The SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, the SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.<sup>11</sup> The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

### ***Exposure of Sensitive Receptors to Substantial Pollutant Concentrations***

The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when a project generates localized pollutant concentrations of NO<sub>2</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> at sensitive receptors near a project site that exceed the localized pollutant concentration thresholds listed above or when a project's traffic causes CO concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards. The roadway CO thresholds would also apply to the contribution of emissions associated with cumulative development.

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<sup>11</sup> *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

**Table IV.C-6  
SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds <sup>a</sup>		
Pollutant	Construction	Operation
NOx	100 pounds/day	55 pounds/day
VOC <sup>b</sup>	75 pounds/day	55 pounds/day
PM <sub>10</sub>	150 pounds/day	150 pounds/day
PM <sub>2.5</sub>	55 pounds/day	55 pounds/day
SO <sub>x</sub>	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants <sup>c</sup>		
NO <sub>2</sub>  1-hour average Annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.10 ppm (federal) <sup>d</sup> 0.03 ppm (State)	
PM <sub>10</sub> 24-hour average Annual average	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation) 1.0 µg/m <sup>3</sup>	
PM <sub>2.5</sub> 24-hour average	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation)	
Sulfate 24-hour average	25 µg/m <sup>3</sup> (state)	
CO  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or Contributes to an exceedance of the following attainment standards: 20 ppm (state) and 25 ppm (federal) 9.0 ppm (state/federal)	
Lead  30-day Average Rolling 3-month average Quarterly average	1.5 µg/m <sup>3</sup> (state) 0.15 µg/m <sup>3</sup> (federal) 1.5 µg/m <sup>3</sup> (federal)	
<i>Notes: ppm = parts per million by volume; µg/m<sup>3</sup> = micrograms per cubic meter</i>		
<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993).		
<sup>b</sup> The definition of VOC includes ROG compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.		
<sup>c</sup> Ambient air quality thresholds for criteria pollutants based on SCQMD Rule 1303, table A-2 unless otherwise stated.		
<sup>d</sup> In January 2010, the USEPA proposed a new 1-hour national air quality standard of 0.10 ppm for NO <sub>2</sub> , which is more stringent than the state's current 1-hour threshold of 0.18 ppm. For the purposes of conducting a conservative analysis, this more stringent national one-hour standard for NO <sub>2</sub> is used as a threshold in the evaluation of the Project's air quality impacts.		
<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403.		
Source: SCAQMD Air Quality Significance Thresholds, website: <a href="http://www.aqmd.gov/ceqa/handbook/signthres.pdf">http://www.aqmd.gov/ceqa/handbook/signthres.pdf</a> , Revision March 2011.		

## **Project Impacts**

### ***AQMP Consistency***

The SCAQMD has adopted the following criteria for determining consistency with regional plans and the regional AQMP: (1) identifying whether a project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and (2) identifying whether a project would exceed the assumptions utilized in preparing the AQMP.

With respect to the first criteria, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable air quality standards. As discussed in more detail below, the Project would result in construction-related NO<sub>x</sub> emissions that exceed the SCAQMD threshold of significance at the project level. However, with respect to construction related emissions, these emissions would be temporary in nature, lasting only for the site preparation/grading/excavation phase (approximately three months), and would not have a long-term impact on the region's ability to meet state and federal air quality standards. In addition, the Project's construction activities would not result in air quality emissions that exceed the localized significance thresholds. Furthermore, the Project will be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the Project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. By meeting SCAQMD rules and regulations, project construction activities will be consistent with the goals and objectives of the 2007 AQMP to improve air quality in the Basin.

With respect to operations, the Project would not generate operational emissions that exceed any of the SCAQMD thresholds of significance at the project level. In addition, because the Project does not introduce substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the Project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the Project. As discussed in detail in this section, implementation of the Project would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) to substantial localized CO concentrations. Thus, the 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.

With regard to the second criterion, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. As discussed in Section IV.I (Population and Housing), the Project's residential population and residential units would represent less than 1.0 percent of the projected growth that is anticipated to occur in the City between 2010 and 2015, 2015 and 2020, and 2010 and 2020. The Project's residential population and residential units represent approximately 25 and 66 percent



(respectively) of the projected growth for the *South Central Los Angeles Community Plan* area. It is possible that some or all of the residential population associated with the Project could already reside in the City or in the *South Central Los Angeles Community Plan* area. In this case, the Project's residential population would not result in any net population growth for the City or Community Plan area. However, the Project's residential population and residential units would exceed the growth anticipated for Census Tract 1945.00. Nonetheless, because the amount of residential units and residential population fall within the growth projections for the City and Community Plan area, the Project would not generate substantial population growth. Additionally, as discussed in Section IV.F (Land Use and Planning), the Project would be substantially consistent with the applicable policies of the Framework Element and RCP and consistent with all applicable policies of the Housing Element.

Because the Project would not cause or worsen an exceedance of an ambient air quality standard and would be consistent with the underlying assumptions of the SCAQMD's 2007 AQMP and does not cause or worsen an exceedance of an ambient air quality standard, the Project is consistent with the 2007 AQMP, and impacts related to this issue would be less than significant.

### ***Violate Air Quality Standards/Contribute to Air Quality Violation***

#### ***Construction-Related Emissions***

Three basic types of activities are expected to occur and generate construction-related emissions at the Project site as a result of implementation of the Project. The first activity would involve the demolition of the existing commercial building and surface parking lot at the site. The debris from the demolished lot would be exported to a landfill. Secondly, the Project site would be excavated to accommodate the building foundation for the proposed residential building structures, and the excavated soil would be exported. Finally, the proposed residential uses would be constructed. Overall, construction activities at the Project site are anticipated to last approximately 2.5 years, beginning in the year 2013 with occupancy in the year 2015.

Construction activities at the Project site would generate pollutant emissions from the following construction activities: (1) demolition, grading, and excavation; (2) construction workers traveling to and from the Project site; (3) delivery and hauling of construction supplies and debris to and from the Project site; (4) the fuel combustion generated by onsite construction equipment; and (5) building construction, including the application of architectural coatings. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving site preparation and grading would primarily generate PM<sub>10</sub> emissions. Mobile source emissions (use of diesel-fueled equipment onsite, and traveling to and from the Project site) would primarily generate NO<sub>x</sub> emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The calculation of regional daily construction emissions associated with the Project was prepared utilizing the CalEEMod computer model recommended by the SCAQMD. Construction equipment that would

generate criteria air pollutants include, but are not limited to, excavators, backhoes, loaders, dozers, and haul trucks. Some of this equipment would be used during demolition and grading activities as well as during construction of the proposed structure. In addition, emissions during construction activities include those associated with export truck trips offsite to remove debris and soil during the demolition and grading phases, respectively, and with delivery truck trips during the building phase. It was assumed that all of the construction equipment used would be diesel-powered. The following provides a detailed explanation of the assumptions utilized in the preparation of this analysis.

#### *Demolition Phase*

Demolition would include the existing commercial building and surface parking lot. This analysis assumes demolition would be completed in approximately one month. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and three tractors/loaders/backhoes. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

#### *Site Preparation, Grading & Excavation Phase*

After the completion of demolition and site clearing, the grading, site preparation, and excavation phase for the Project would occur for approximately three months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. The construction of the Project's two-level subterranean parking garage would require approximately 65,000 cubic yards of soil to be hauled off-site. This analysis assumes daily grading and site preparation activities would require the following equipment: one excavator, one grader, one rubber tired dozer, and one tractor/loader/backhoe. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

#### *Building Construction Phase*

The building construction phase consists of below grade and above grade structures and is expected to occur for approximately 25 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final two months of the building construction phase, and paving would occur during the final month of construction. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, one forklift, one generator, two tractors/loaders/backhoes, two welders, one air compressor, one piece of paving equipment, one cement and mortar mixer, and one roller. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

### Regional Construction Emissions

The analysis of regional daily construction emissions has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. Table IV.C-7 identifies daily emissions that are estimated to occur on the peak construction day for each of the construction phases, although construction time frames and day-to-day construction activities may vary.

**Table IV.C-7**  
**Estimated Peak Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition Phase</b>						
Fugitive Dust	--	--	--	--	0.20	0.00
Off-Road Diesel	5.07	38.45	23.67	0.04	2.29	2.04
On-Road Diesel (Hauling)	0.14	1.34	0.79	0.00	1.25	0.06
Worker Trips	0.09	0.10	0.96	0.00	0.21	0.01
<b>Total Emissions</b>	<b>5.30</b>	<b>39.89</b>	<b>25.42</b>	<b>0.04</b>	<b>3.95</b>	<b>2.11</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<b>Site Preparation/Grading/Excavation Phase</b>						
Fugitive Dust	--	--	--	--	2.41	1.30
Off-Road Diesel Equipment	5.25	41.52	25.36	0.04	2.12	1.89
On-Road Diesel (Hauling)	7.57	74.59	43.83	0.10	6.20	3.20
Worker Trips	0.07	0.08	0.74	0.00	0.16	0.01
<b>Total Emissions</b>	<b>12.89</b>	<b>116.19</b>	<b>69.93</b>	<b>0.14</b>	<b>10.89</b>	<b>6.40</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	Yes	No	No	No	No
<b>Building Construction Phase</b>						
Building Construction Off-Road Diesel Equipment	4.79	28.64	18.89	0.03	1.92	1.71
Building Construction Vendor Trips	0.26	2.66	1.85	0.00	0.23	0.10
Building Construction Worker Trips	0.74	0.78	7.53	0.01	1.62	0.11
Architectural Coatings	25.81	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.54	3.42	2.53	0.00	0.29	0.26
Architectural Coating Worker Trips	0.13	0.13	1.25	0.00	0.32	0.02
Paving Off-Road Diesel Equipment	1.46	9.08	6.30	0.01	0.76	0.68
Paving Worker Trips	0.05	0.05	0.50	0.00	0.13	0.01
<b>Total Emissions</b>	<b>33.78</b>	<b>44.76</b>	<b>38.85</b>	<b>0.05</b>	<b>5.27</b>	<b>2.89</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: These calculations assume implementation of dust control measures as required by SCAQMD Rule 403—Fugitive Dust.</i> <i>Source: Parker Environmental Consultants, September 2012. Calculation sheets are provided in Appendix IV.C, pages 38-60.</i>						

As shown in Table IV.C-7 the peak daily emissions generated during the Project's site preparation, grading, and excavation phase would exceed the regional emission threshold recommended by the SCAQMD for NO<sub>x</sub> largely due to off-road diesel powered equipment and soil hauling. The daily emissions generated during all other construction phases of the Project would not exceed any of the regional thresholds recommended by the SCAQMD. Therefore, regional air quality impacts associated with the Project-related construction emissions would be considered potentially significant.

#### Construction-Related Localized Emissions

The daily construction emissions generated by the Project are also analyzed against SCAQMD's LSTs to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The nearest off-site receptors to the Project site potentially subject to localized air quality impacts associated with construction of the Project include:<sup>12</sup>

- The Norwood Street Elementary School located approximately 64 feet east of the Project site, across Oak Street;
- The single-family residences located south of the Project site, across 20<sup>th</sup> Street, with the nearest residence located approximately 55 feet away from the Project site;
- The one-story commercial building located immediately adjacent to the west of the Project site boundary;
- The single-family residences located west of the Project site, with the nearest residence located approximately 204 feet away from the Project site;
- The Downtown Value School located approximately 292 feet west of the Project site;
- The commercial building and abandoned two-story church building located approximately 103 feet north of the Project site, across Washington Boulevard; and
- The Casa Camino Real Building located approximately 167 feet northeast of the Project site, across Washington Boulevard.

The closest receptor distance in the SCAQMD's Mass Rate LST Look-up Tables is 82 feet. Although some of the nearest off-site receptors to the Project site identified above are closer than 82 feet, the SCAQMD's

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<sup>12</sup> The off-site receptors evaluated in this localized air quality impacts analysis includes the existing surrounding commercial uses because, as discussed previously, LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, should be applied to receptors such as industrial or commercial facilities based on the SCAQMD's recommendation.

LST methodology states that projects with boundaries located closer than 82 feet (25 meters) to the nearest receptor should use the LSTs for receptors located at 82 feet.<sup>13</sup>

As shown on Table IV.C-8, on-site emissions generated by the Project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO<sub>x</sub> (in the form of NO<sub>2</sub>), CO, PM<sub>10</sub>, and PM<sub>2.5</sub> at a receptor distance of 82 feet. Thus, the on-site construction emissions would also not exceed the SCAQMD localized thresholds at receptor distances beyond 82 feet (i.e., 164, 328, 656, and 1,640 feet). Therefore, Project impacts related to construction-related localized emissions would be less than significant.

**Table IV.C-8**  
**Localized On-Site Peak Daily Construction Emissions**

Construction Phase <sup>a</sup>	Total On-site Emissions (Pounds per Day)			
	NO <sub>x</sub> <sup>b</sup>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition Emissions</b>	<b>38.45</b>	<b>23.67</b>	<b>2.29</b>	<b>2.04</b>
SCAQMD Localized Thresholds	56.16	1,011.92	7.93	4.57
Potentially Significant Impact?	No	No	No	No
<b>Site Preparation, Grading &amp; Excavation Emissions</b>	<b>41.52</b>	<b>25.36</b>	<b>4.53</b>	<b>3.19</b>
SCAQMD Localized Thresholds	56.16	1,011.92	7.93	4.57
Potentially Significant Impact?	No	No	No	No
<b>Building Construction Emissions</b>	<b>41.14</b>	<b>27.72</b>	<b>2.97</b>	<b>2.65</b>
SCAQMD Localized Thresholds	56.16	1,011.92	7.93	4.57
Potentially Significant Impact?	No	No	No	No
<sup>a</sup> The localized thresholds for all phases are based on a receptor distance of 82 feet in SCAQMD's SRA 1. Thresholds were calculated based on the linear regression methodology recommended by the SCAQMD for a 2.03-acre Project Site. <sup>b</sup> The localized thresholds listed for NO <sub>x</sub> in this table takes into consideration the gradual conversion of NO <sub>x</sub> to NO <sub>2</sub> , and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO <sub>x</sub> emissions is focused on NO <sub>2</sub> levels as they are associated with adverse health effects. Source: Parker Environmental Consultants, September 2012. Calculation sheets are provided in Appendix IV.C., pages 38-60. LST Linear Regression Sheet is provided in Appendix IV.C, page 61.				

### Operational-Related Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project site after occupation. As stated previously, stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment; mobile emissions would be generated by the motor vehicles traveling to and from the Project site.

<sup>13</sup> SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.

### Operation-Related Regional Emissions

The analysis of daily operational emissions from the Project has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. The results of these calculations, and associated SCAQMD thresholds, are presented on Table IV.C-9. As shown in Table IV.C-9, the net operational emissions associated with the Project would not exceed the established SCAQMD threshold levels for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> during both the summertime (smog season) and wintertime (non-smog season). Therefore, Project impacts related to operation-related regional emissions would be less than significant.

**Table IV.C-9**  
**Estimated Future Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Natural Gas Usage	0.11	0.90	0.38	0.01	0.07	0.07
Hearth <sup>a</sup>	0.25	0.00	0.01	0.00	0.17	0.17
Landscape Maintenance Equipment	0.39	0.14	12.08	0.00	0.06	0.06
Consumer Products	2.81	--	--	--	--	--
Architectural Coatings	0.30	--	--	--	--	--
Mobile (Vehicle) Sources	4.66	11.47	46.26	0.09	9.71	0.85
<i>Total Project Emissions</i>	<i>8.52</i>	<i>12.51</i>	<i>58.73</i>	<i>0.10</i>	<i>10.01</i>	<i>1.15</i>
<i>Less Existing Project Site Emissions</i>	<i>2.97</i>	<i>6.67</i>	<i>27.64</i>	<i>0.03</i>	<i>3.94</i>	<i>0.37</i>
<b>Total Project Net Emissions</b>	<b>5.55</b>	<b>5.84</b>	<b>31.09</b>	<b>0.07</b>	<b>6.07</b>	<b>0.78</b>
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<b>Wintertime (Non-Smog Season) Emissions</b>						
Natural Gas Usage	0.11	0.90	0.38	0.01	0.07	0.07
Hearth <sup>a</sup>	0.25	0.00	0.01	0.00	0.17	0.17
Landscape Maintenance Equipment	0.39	0.14	12.08	0.00	0.06	0.06
Consumer Products	2.81	--	--	--	--	--
Architectural Coatings	0.30	--	--	--	--	--
Mobile (Vehicle) Sources	4.95	12.40	45.35	0.08	9.72	0.86
<i>Total Project Emissions</i>	<i>8.81</i>	<i>13.44</i>	<i>57.82</i>	<i>0.09</i>	<i>10.02</i>	<i>1.16</i>
<i>Less Existing Project Site Emissions</i>	<i>3.17</i>	<i>7.24</i>	<i>27.34</i>	<i>0.03</i>	<i>3.94</i>	<i>0.37</i>
<b>Total Project Net Emissions</b>	<b>5.64</b>	<b>6.20</b>	<b>30.48</b>	<b>0.06</b>	<b>6.08</b>	<b>0.79</b>
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<sup>a</sup> Assumes all hearth would be natural gas. Source: Parker Environmental Consultants, September 2012. Calculation sheets are provided in Appendix IV.C, pages 15-60.						

## ***Exposure of Sensitive Receptors***

### ***Localized CO Hotspot Concentrations***

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or when the LOS for an intersection worsens from C to D or worse. Based on a review of the Supplemental Traffic Analysis prepared for the Project,<sup>14</sup> project-related traffic volumes under the Existing With Project Traffic scenario would not meet these criteria at any of the eight analyzed study intersections. Thus, future 1-hour and 8-hour CO concentrations near the study intersections would not have the potential to exceed their respective federal or state ambient air quality standards (i.e., the federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm; the 8-hour federal and state standards for localized CO concentrations are 9.0 ppm). As such, under the Existing With Project Traffic scenario, implementation of the Project would not expose any possible sensitive receptors (such as residential uses, schools, hospitals, etc.) located in close proximity to these intersections to substantial localized pollutant concentrations. Therefore, impacts with respect to localized CO concentrations under the Existing With Project Traffic scenario would be less than significant.

### ***TACs***

As the Project would consist of the development of residential uses, and would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would result from its implementation. In addition, construction activities associated with the Project would be typical of other similar residential developments in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of TACs from the Project site would be less than significant.

## **CUMULATIVE IMPACTS**

### **AQMP Consistency**

As discussed above, the Project would not increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations, and would be consistent with the SCAG population and housing growth projections utilized to prepare the AQMP. The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy.

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<sup>14</sup> Oak Village Residences Project –Supplemental Traffic Analysis, prepared by Linscott, Law, and Greenspan, August 2, 2012.

Growth considered to be consistent with the 2007 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2007 AQMP would not be obstructed by such growth. Since the Project would not jeopardize attainment of air quality standards in the 2007 AQMP for the Basin and the Los Angeles County portion of the Basin, the Project would not have a cumulatively considerable contribution to any impact related to potential cumulative conflict with or obstruction of the implementation of the applicable air quality plan.

## **Violate Air Quality Standards/Contribute to Air Quality Violation**

### ***Construction-Related Emissions***

Because the Basin is currently in non-attainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. With respect to determining the significance of the Project's contribution to regional emissions, the SCAQMD neither recommends quantified analyses of cumulative construction emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction impacts. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed previously, construction of the Project would exceed the SCAQMD's threshold of significance for NO<sub>x</sub> during the site preparation/grading/excavation phase due to diesel-powered construction equipment and on-road soil hauling. All of the other construction phases for the Project would not exceed the SCAQMD's threshold of significance for any of the criteria pollutants. As such, the daily construction NO<sub>x</sub> emissions during site preparation/grading/excavation activities would be considered cumulatively considerable, and cumulative impacts with respect to NO<sub>x</sub> emissions during the construction of the Project would be considered significant and unavoidable.

### ***Operational Emissions***

Due to the non-attainment of ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards in the Basin, the generation of daily operational emissions associated with cumulative development would result in a cumulative significant impact associated with the cumulative net increase of any criteria pollutant for which the region is in non-attainment. With respect to operational emissions, the SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants (CO, ROG, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. As discussed previously, operational emissions associated with the Project would not exceed the SCAQMD's thresholds of significance for any of the criteria pollutants. As such, the daily operational emissions associated with the criteria pollutants generated by the Project would not be cumulatively considerable. Therefore, cumulative impacts related to operational emissions would be less than significant.



## Exposure of Sensitive Receptors

### Localized CO Hotspot Concentrations

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or when the LOS for an intersection worsens from C to D or worse. Based on a review of the Supplemental Traffic Analysis prepared for the Project,<sup>15</sup> project-related traffic volumes under the cumulative Future (2015) With Project Traffic scenario would meet these criteria at two of the eight analyzed study intersections (this scenario includes traffic volumes from existing conditions, related projects, ambient growth, and the Project in the year 2015).

As shown on Table IV.C-10, future 1-hour and 8-hour CO concentrations near the study intersections would not exceed their respective federal or state ambient air quality standards (i.e., the federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm; the 8-hour federal and state standards for localized CO concentrations are 9.0 ppm). Thus, implementation of the Project under the cumulative Future (2015) With Project Traffic scenario would not expose any possible sensitive receptors (such as residential uses, schools, hospitals, etc.) located in close proximity to these intersections to substantial localized CO concentrations. Therefore, cumulative impacts related to this issue would be less than significant.

**Table IV.C-10**  
**Future Localized Carbon Monoxide Concentrations**

Intersection	CO Concentrations in Parts per Million <sup>a</sup>							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Figueroa Street and Washington Boulevard	5.0	3.6	4.4	3.1	4.1	3.0	3.8	2.8
Figueroa Street and 23 <sup>rd</sup> Street	4.5	3.3	4.0	2.9	3.8	2.8	3.6	2.6
<sup>a</sup> The federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm. National and state 8-hour standards are 9.0 parts per million. Traffic Information Source: Linscott, Law & Greenspan, Engineers, Traffic Impact Study, Oak Village Residences Project, July 14, 2009; and Supplemental Traffic Analysis, August 2, 2012. Source: Parker Environmental Consultants, September 2012. Calculation data and results are provided in Appendix IV.C, pages 70 and 71.								

### TACs

As discussed previously, the health effects of TACs tend to be felt on a local scale rather than on a regional basis. The nearest related project (#12) is located approximately 2.5 miles from the Project site.

<sup>15</sup> Oak Village Residences Project –Supplemental Traffic Analysis, prepared by Linscott, Law, and Greenspan, August 2, 2012.

Similar to the Project, this related project, which includes development of a shopping center, would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. In addition, although potential releases of some TACs could occur as a result of construction activities for any type of development, these activities would be subject to the regulations and laws related to TACs at the regional, state, and federal level. Therefore, cumulative impacts associated with the release of TACs would be less than significant.

## **MITIGATION MEASURES**

Construction-related regional emissions generated by the Project would be significant. The City requires implementation of the following Standard Mitigation Measures to meet SCAQMD District Rule 403:

- C-1: All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions.
- C-2: 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.
- C-3: All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- C-4: All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- C-5: All clearing, grading, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 miles per hour), so as to prevent excessive amounts of dust.
- C-6: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The peak daily emissions generated during the Project's site preparation, grading, and excavation phase would exceed the regional emission threshold recommended by the SCAQMD for NO<sub>x</sub> largely due to off-road diesel-powered equipment and soil hauling. The daily emissions generated during all other construction phases of the Project would not exceed any of the regional or localized thresholds recommended by the SCAQMD. Therefore, regional air quality impacts associated with the Project-related construction emissions would be considered significant and unavoidable. All other impacts related to air quality would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### D. CULTURAL RESOURCES

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#### INTRODUCTION

The information and analysis in this section is based primarily on the following report, which is included in Appendix IV.D of this EIR:

- *Historic Resource Report, 924 Washington, Los Angeles, California*, Galvin Preservation Associates, October 2009.

#### ENVIRONMENTAL SETTING

Generally, a lead agency must consider a property a historic resource under CEQA if the property is eligible for listing in the California Register of Historical Resources (the “California Register”). The California Register is modeled after the National Register of Historic Resources (the “National Register”). Furthermore, a property is presumed to be historically significant if the property is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant. The National and California Registers are discussed in more detail below.

##### **National Register**

The National Register is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The National Register recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archeological resources. The National Park Service, a part of the U.S. Department of the Interior, administers the National Register.

##### ***National Register Criteria***

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or

- 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.

### **Physical Integrity**

According to National Register Bulletin #15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in National Register Bulletin #15 as “the ability of a property to convey its significance.” Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity. They are feeling, association, workmanship, location, design, setting, and materials.

### **Context**

To be eligible for listing in the National Register, a property must also be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.” A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

### **California Register**

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts. The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

***California Register Criteria***

The criteria for eligibility of listing in the California Register are based upon National Register criteria. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level under one or more of the following four criteria:

1. The property is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. The property is associated with the lives of persons important to local, California, or national history; or
3. The property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. The property has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A resource less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand the historical importance of the resources. Although the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:

1. The survey has been or will be included in the State Historic Resources Inventory.
2. The survey and the survey documentation were prepared in accordance with OHP procedures and requirements.
3. The resource is evaluated and determined by the OHP to have a significance rating of Category 1 to 5 on a DPR Form 523.
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

## **OHP Survey Methodology**

The evaluation instructions and classification system proscribed by OHP in its Instructions for Recording Historical Resources provide a three-digit evaluation code for use in classifying potential historic resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs reevaluation.

## **City of Los Angeles Cultural Heritage Ordinance**

The City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. Section 22.171.7 of the Ordinance states the following:

For purposes of this article, a Historic-Cultural Monument is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City, including historic structures or sites in which the broad cultural, economic or social history of the nation, state, or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, state or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

### **Historic Preservation Overlay Zones**

Recognizing the need to identify and protect neighborhoods with distinct architectural and cultural resources, the City has developed an expansive program of Historic Preservation Overlay Zones (HPOZs). HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historical properties within designated districts.

The City Council adopted the ordinance enabling the creation of HPOZs in 1979; Angelino Heights became the City's first HPOZ in 1983. Today, the City has 29 designated HPOZs, with many more under consideration. HPOZ areas range in size from neighborhoods of approximately 50 parcels to more than 3,000 properties. Most HPOZs are primarily residential with a mix of single- and multi-family housing, but some HPOZs include commercial and industrial properties. HPOZs are established and administered by the Department of City Planning (in concert with the City Council). Individual buildings in an HPOZ need not be of landmark quality on their own: the HPOZ is the collection of a cohesive, unique, and intact collection of historical resources that qualifies an area for HPOZ status.

### ***Citywide HPOZ Ordinance***

City of Los Angeles Ordinance Number 175891, found in Section 12.20.3 of the Los Angeles Municipal Code, describes the procedures for creation of new Historic Preservation Overlay Zones (HPOZs), the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs. The Ordinance was adopted by the Los Angeles City Council on March 19, 2004, and became effective on May 12, 2004. Anyone proposing new construction or seeking to alter existing buildings that involve parcels classified as noncontributing elements within a HPOZ must apply for a certificate of compatibility. The purpose of this certificate is to ensure the architectural and historic integrity of the overlay zone by ensuring that any new construction is consistent and compatible with the historic environment and character of the overlay zone.

### ***University Park Historic Preservation Overlay Zone***

The Project site is located within the University Park HPOZ. The overlay zone is geographically located within the South Los Angeles Community Plan area (refer to Figure IV.D-1). The University Park HPOZ neighborhood dates back to the 1880's when the University of Southern California (USC) was established in the neighborhood.<sup>1</sup> During this period many of the City's wealthy relocated to this suburban neighborhood and constructed large residences. The construction dates and architectural styles of the residences located in the overlay zone vary. The dates of construction range from 1887 to 1924. The architectural styles represented include: Queen Anne, Craftsman, Spanish Colonial Revival, and

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<sup>1</sup> [www.preservation.lacity.org/hpoz/la](http://www.preservation.lacity.org/hpoz/la)



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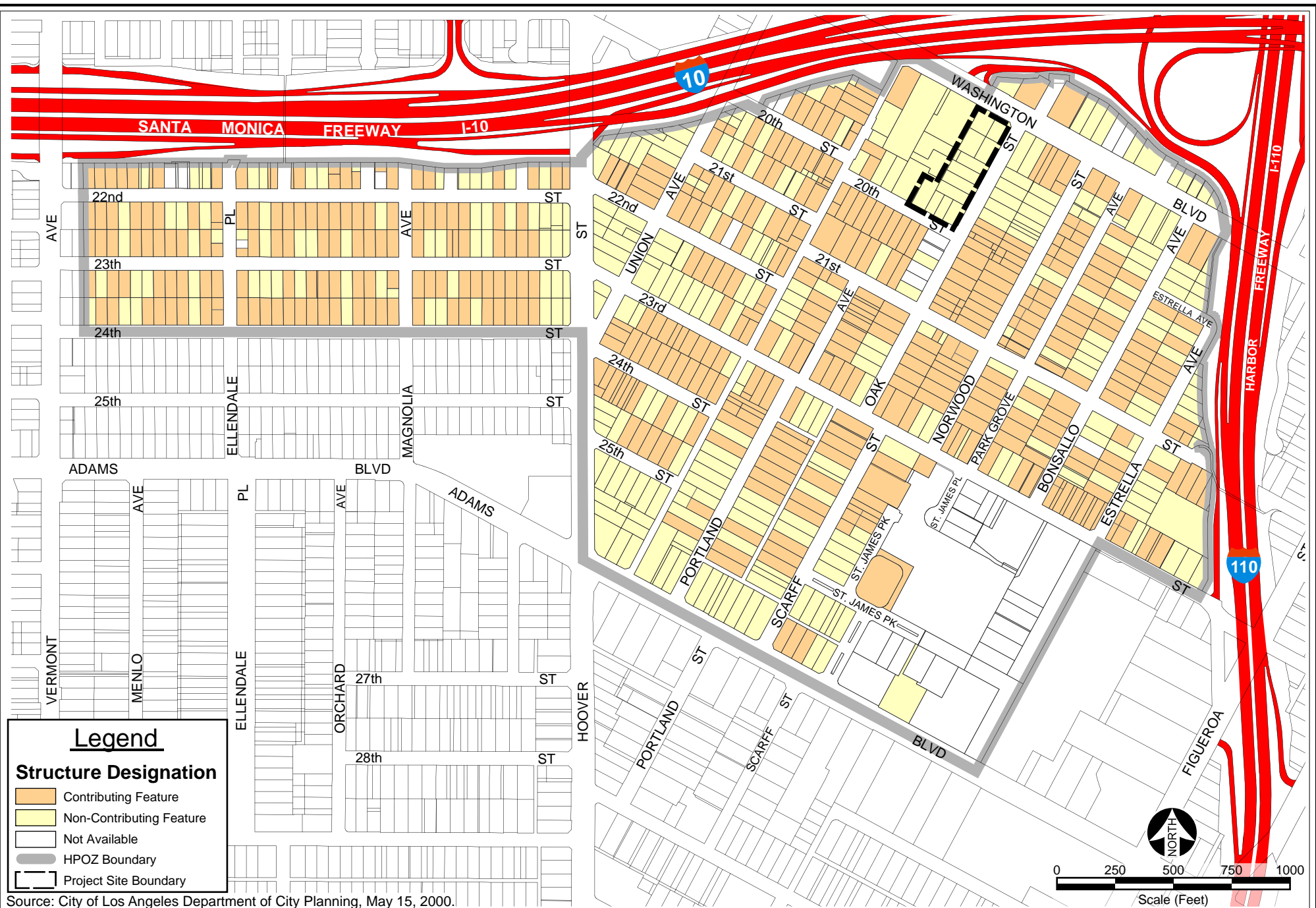


Figure IV.D-1  
University Park HPOZ Boundary

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American Colonial Revival. This neighborhood contains one of the highest numbers of Historic-Cultural Monuments within the City. Although the Project site is located within the HPOZ, none of the ten parcels within the Project site are contributing elements. However, three parcels located within the same block as the Project site are classified as contributing elements, including: 1) the school at the corner of Washington Boulevard and Toberman Street; 2) a multi-family residence that fronts Toberman Street; and 3) a single-family residence that faces 20<sup>th</sup> Street. Many of the parcels within the vicinity of the Project site are classified as contributing elements, namely properties located on 20<sup>th</sup> Street, Toberman Street, Oak Street, Norwood Street, and 21<sup>st</sup> Street.

### **University Park HPOZ Preservation Plan**

The University Park HPOZ Preservation Plan is a City Planning Commission approved document that governs the University Park HPOZ. The main function of the plan is to provide Design Review Guidelines, which clarify and elaborate on criteria established under the HPOZ Ordinance. Design Guidelines are found in Part II of the Preservation Plan and contain four chapters: Architectural Styles, Residential Rehabilitation and Infill, Commercial/Industrial Rehabilitation and Infill, and Public Realm. Different guidelines apply to different types of projects. Infill guidelines apply to new construction and work on non-contributing buildings. The Residential Infill Guidelines are intended for use in the review of new construction in residential areas, while the Commercial/Industrial Infill Guidelines are intended for use in commercial/industrial areas including proposed buildings that are partly or wholly residential.

### **20<sup>th</sup> Street National Register Historic District**

Directly across 20<sup>th</sup> Street from the Project site is a National Register Historic District. Nearly all of the houses on the south side of the 900 block on 20<sup>th</sup> Street are classified as contributing elements within the HPOZ and are also listed on the National Register of Historic Places (the “National Register”). The 20<sup>th</sup> Street district was listed in the National Register on July 22, 1991 and is architecturally significant under Criterion C as an outstanding collection of Late Shingle/Craftsman style houses. The district includes ten houses that were all built by W. Wayman Watts between 1902 and 1908.

### **Project Site**

The existing land uses on the Project site include a commercial building used to warehouse supplies for a catering truck business that was constructed in 1980 and two associated surface parking lots. No significant historical structures or potentially significant historical structures are located on the Project site.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G to the *CEQA Guidelines*, a project would have a significant effect on cultural and historical resources if the project would:

- a) Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5;
- b) Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5;
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- d) Disturb any human remains, including those interred outside of formal cemeteries.

For purposes of CEQA, to determine whether a historic resource could be significantly affected, the significance of the resource itself must first be determined. Pursuant to Section 15064.5 of the CEQA Guidelines, a historic resource (including both built environment and prehistoric archaeological resources) is presumed significant if the structure is listed on the CRHR or has been determined to be eligible for listing by the State Historical Resources Commission. A historic resource may also be considered significant if a lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the CRHR. The criteria are as follows:

- 1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2. The resource is associated with lives of persons important in our past;
- 3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

In addition, pursuant to Section 15064.5 of the CEQA Guidelines, a project could have a significant effect on the environment if it "may cause a substantial adverse change in the significance of an historical resource." A "substantial adverse change" means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired." Material impairment means altering "...in an adverse manner those characteristics of an

historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.” Impacts to those historic resources not determined to be significant according to the significance criteria described above are not considered significant for the purposes of CEQA. Additionally, “[g]enerally, a project that follows the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* [the “Standards”] shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

### ***L.A. CEQA Thresholds Guide***

The *L.A. CEQA Thresholds Guide* requires the cultural resources analysis to address the following areas of study: (1) paleontological resources; (2) archaeological resources; and (3) historic resources.

#### *1. Paleontological Resources*

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.

#### *2. Archaeological Resources*

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-old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

### 3. *Historic Resources*

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;
- 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.

#### ***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any impacts related to thresholds “b,” “c,” and “d” listed under the *CEQA Guidelines*. Thus, no further analysis of these issues is required. Regarding factors 1 and 2 listed under the *L.A. CEQA Thresholds Guide*, these factors are similar to thresholds “b” and “c” listed under the *CEQA Guidelines*, and no further analysis of these issues is required. Factor 3 under the *L.A. CEQA Thresholds Guide* is similar to threshold “a” listed under the *CEQA Guidelines*, and impacts related to historic resources are discussed in detail below.

### **Project Impacts**

#### ***Historical Resources***

##### **Direct Impacts on Historical Resources**

As previously noted, there are no historical resources on the Project site. The Project would not involve the demolition, relocation, or alteration of any historical resources. As such, the Project would have no direct impacts on any historical resources.

##### **Indirect Impacts on Historical Resources**

In addition to the potential direct impacts, the indirect impacts of the development of the Project must be analyzed. As identified in the analysis above, the Project site is located in the University Park HPOZ and across the street from the 20<sup>th</sup> Street National Register District. The impact of the Project on the HPOZ and the National Register District would be less than significant because the Project would not materially alter them. No buildings in the HPOZ or National Register District would be demolished, relocated, or

altered as a result of the Project. The HPOZ and the National Register District would remain architecturally significant as fine collections of late 19<sup>th</sup> and early 20<sup>th</sup> century residential buildings.

As previously stated, projects that may affect historical resources are considered to be mitigated to a level of less than significant, if the projects conform to the Secretary of the Interior's Standards. The only Standards applicable to new construction in or adjacent to historic districts are #9 and #10.

### **Compliance to Standard #9**

The Standard states: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

The Project complies with Standard #9. The proposed buildings are compatible with the surrounding environment. The design of the buildings changes in height, scale, and massing along the length of Oak Street in the Project vicinity. The design of the proposed town homes at the south end of the Project site take their cues from the contributing buildings in the 20<sup>th</sup> Street National Register District across the street. There are four townhouses, two stories in height and approximately 35 feet tall. The front yard setback is 19 feet, similar to that of the contributing buildings. The proposed buildings make reference to the contributing buildings in the form of the roofs, materials, color, fenestration pattern and type, and architectural features such as porches and chimneys.

The proposed building in the middle of the Project site is four stories in height and approximately 40 feet tall. Architecturally, this building is similar to the proposed building at the north end of the Project site that faces Washington Boulevard and is six stories in height and approximately 65 feet tall. These buildings employ architectural features from period revival styles, but do not reference a particular historical style. The Norwood School is across the street from the proposed building in the middle of the Project site. The school consists of several buildings that are non-contributing in the University Park HPOZ.

The proposed building at the north end of the Project site faces Washington Boulevard, which is a major commercial thoroughfare. Overpasses for the Interstate 10 (I-10) and State Route 110 (SR-110) overshadow the buildings west and east of the Project site, respectively. Across Washington Boulevard from the Project site is a church, and kitty corner from the Project site is a multi-story commercial building 90 feet in height. The church and multi-story commercial building are contributing to the University Park HPOZ. The proposed building facing Washington Boulevard is compatible with the height, scale, and massing of these buildings. Although there are two contributing buildings across Washington Boulevard from the Project site, the buildings are very different from each other, and Washington Boulevard does not have the same sense of time and place as the rest of the University Park HPOZ to the south.



**Compliance to Standard #10**

The Standard states: “New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historical property and its environment would be unimpaired.”

The Project complies with Standard #10. The proposed buildings are not immediately adjacent to any historical resources, but rather across the street. If the proposed buildings were removed in the future, the historical resources would not be materially affected. The essential form and integrity of the historical resources and their environment would be unimpaired.

**Compliance with University Park HPOZ Preservation Plan**

The Preservation Plan is a City Planning Commission approved document that governs the University Park HPOZ. The main function of the plan is to provide Design Review Guidelines, which clarify and elaborate upon criteria established under the HPOZ Ordinance. Design Guidelines are found in Part II of the Preservation Plan and contain four chapters: Architectural Styles, Residential Rehabilitation and Infill, Commercial/Industrial Rehabilitation and Infill, and Public Realm. Different guidelines apply to different types of projects. Infill guidelines apply to new construction and work on non-contributing buildings. The Residential Infill Guidelines are intended for use in the review of new construction in residential areas, while the Commercial/Industrial Infill Guidelines are intended for use in commercial/industrial areas including proposed buildings that are partly or wholly residential. As such the Residential Infill Guidelines are applicable to the four duplex town home buildings across the street from the 20<sup>th</sup> Street National Register District, while the Commercial/Industrial Infill Guidelines are applicable to the two condominium buildings on Washington Boulevard and Oak Street. Below is a point-by-point analysis of how the Project does or does not comply with the Preservation Plan.

*Residential Design Guidelines – Infill***Location and Site Design**

1. *New residential structures should harmonize in scale and massing with the existing historic structures in surrounding blocks.*

The Project complies with this guideline, as the scale and massing of the proposed buildings was designed in response to the scale and massing of the contributing buildings in the area. The design of the buildings changes in height, scale, and massing along the length of Oak Street in the Project vicinity. The design of the proposed town homes at the south end of the Project site takes their cues from the contributing buildings in the 20<sup>th</sup> Street National Register District across the street. There are four townhouses, two stories in height and approximately 35 feet tall. The proposed building in the middle of the Project site would be four stories in height and approximately 40 feet tall, scaled to provide a transition to the proposed building at the north end of the Project site that faces Washington Boulevard. This building and is six stories in height and approximately 65 feet tall. Overpasses for the I-10 and SR-110 overshadow the buildings west and east of the Project site, respectively. Across Washington Boulevard from the

Project site is a church, and kitty corner from the Project site is a multi-story commercial building 90 feet in height. The church and multi-story commercial building are contributing to the University Park HPOZ. The proposed building facing Washington Boulevard would be compatible with the height, scale, and massing of these buildings.

2. *Front and side yard areas should be dedicated to planting areas. Concrete and parking areas in the front and side yards are inappropriate.*

The Project complies with this guideline. The street-facing setbacks will be landscaped. There are no parking areas in the front or side yards. Project parking would be provided in a subterranean structure accessed along Oak Street.

3. *Paving and parking areas should be located to the rear of new residential structures whenever possible.*

The intent of this guideline was, no doubt, for paving and parking areas to not be located in front of new structures. Therefore, the Project complies with this guideline, as there are no paving or parking areas in front of the four proposed town home buildings.

4. *Attached garages that face the street are inappropriate in new construction.*

The Project complies with this guideline, as no attached garages are proposed.

5. *For larger lots and contiguous lots, the side yard and overall lot coverage of the proposed new development should be compatible with the historic development pattern of the block. There is an exception for relocating historic structures onto sites.*

The historic development pattern of the block reflects its transitional location between commercial and industrial uses along Washington Boulevard and the residential uses to the south. The section of the Project site along 20<sup>th</sup> Street would be developed with relatively small-scale residential buildings, like the ones that existed historically. The lot coverage of the four proposed town home buildings is comparable to the contributing residential buildings across 20<sup>th</sup> Street.

6. *If the historic development pattern for a vacant lot is known, new construction on the lot shall be encouraged to follow this pattern.*

The Project complies with this guideline. The section of the Project site along 20<sup>th</sup> Street would be developed with relatively small-scale residential buildings, like the ones that existed historically. The lot coverage of the four proposed town home buildings is comparable to the contributing residential buildings across 20<sup>th</sup> Street.

7. *Large multi-parceled projects should be subdivided to show a size, scale and rhythm similar to existing conditions.*

The Project complies with this guideline. The Project site along 20<sup>th</sup> Street consists of four parcels, which are reflected in the four proposed town home buildings. Each building has the same, separate footprint that establishes a rhythm along 20<sup>th</sup> Street. The buildings are similar in size and scale to the contributing residential buildings on 20<sup>th</sup> Street.

8. *Mature trees on a lot should be preserved when feasible.*

This guideline is not applicable as there are no mature trees on the Project site.

9. *Development of an appropriate landscape plan is encouraged for all projects.*

The Project complies with this guideline. A landscape plan has been developed and echoes the traditional landscaping found throughout the HPOZ.

10. *Request that the Department of Transportation, Bureau of Engineering, and the Department of Building and Safety maximize street parking when feasible by providing a minimum distance of 26 feet between curb cuts.*

The Project complies with this guideline. There is only one proposed curb cut on Oak Street.

11. *The original open front lawns become a “common” amenity against which the houses repose in a “park-like” setting. The uniformity of the houses in scale, form and appearance compliments that image.*

The Project complies with this guideline. The landscape plan includes areas of lawn on 20<sup>th</sup> and Oak Streets.

12. *Discourage installation of landscaping or monumental hedges, which interrupt the continuous open area between the facade and street and/or obscure the view of the house from the street.*

The Project complies with this guideline. The landscaping would not include any tall hedges that block the view of the four town home buildings from the street.

13. *Large expanses of concrete or asphalt are generally undesirable because they attract and hold heat in summer and are not visually attractive or historically appropriate.*

The Project complies with this guideline. The Project would not include large expanses of concrete or asphalt.

14. *Outdoor lighting should be located in a manner that reduces direct lighting of neighborhood properties.*

The Project would comply with all LAMC lighting standards, which require all lighting to be directed down and not to spill to off-site properties.

15. *Identify and respect the pattern of front and rear setbacks for the block. While side and rear setbacks may vary, the traditional site relationships should be maintained.*

The Project complies with this guideline. The front yard setback of the proposed town homes at the south end of the Project site would be 19 feet, similar to that of the contributing buildings across 20<sup>th</sup> Street.

16. *Five foot overhangs over the driveways are to be avoided.*

The Project complies with this guideline, as there are no driveways.

17. *Paving materials historically used are still appropriate today. For Paths: Sod, brick, stone, slabs, slate, cobblestone. For Courtyards or patios: Cobblestones, slate, brick. For Driveways: Brick, stone, cobblestones.*

Paving materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

18. *Minimize the width of the driveway to avoid extensive paved surfaces. The use of Hollywood drives is recommended (A middle planting strip between two adjacent driveways.)*

The Project complies with this guideline, as there are no driveways.

#### Massing and Orientation

1. *New residential structures should be consistent in scale and massing with the existing historic structures with the prevailing block.*

The Project complies with this guideline. The four proposed town home buildings are similar in size and scale as the contributing residential buildings across 20<sup>th</sup> Street.

2. *New structures which will be larger than their neighbor's should be designed in modules, with the greater part of the mass located away from the main façade to minimize the perceived bulk of the structure.*

The Project complies with this guideline. There are no neighboring contributing buildings. However, the four proposed town home buildings are not significantly larger than the contributing residential buildings across 20<sup>th</sup> Street.

3. *New residential structures should present their front door and major architectural facades to the primary street, and not to the side or rear yard.*

The Project complies with this guideline. The front doors and major architectural features of the four town home buildings face toward 20<sup>th</sup> Street.

4. *In some cases on corner lots, a corner entryway between two architectural facades may be appropriate.*

The Project complies with this guideline. The Project site includes the corner of 20<sup>th</sup> and Oak Streets. The town home building at this corner has two front entryways, one for each unit. One is situated on the corner of the building.

5. *A progression of public to private spaces in the front yard is encouraged. One method of achieving this goal is through the use of a porch to define the primary entryway.*

The Project complies with this guideline as the four town home buildings contain front entry porches.

6. *New structures should be massed such that their floor plan should be consistent with the pattern of development of historic structures in the neighborhood.*

The historic structures in the neighborhood represent a variety of housing types including single- and multi-family. The four town home buildings are similar in massing to the two-story multi-family structures in the neighborhood, although they are still complimentary to the single-family residential structures across 20<sup>th</sup> Street and the two-story structure associated with the Norwood Street Elementary School located across from the Project site on Oak Street. Therefore, the Project complies with this guideline.

7. *If the prevailing height is less than prescribed by code, then a new project should adopt a height similar to the prevailing.*

The Project complies with this guideline. The four town home buildings are approximately 35 feet in height, which is similar to the contributing residential buildings across 20<sup>th</sup> Street and the two-story structure associated with the Norwood Street Elementary School located across from the Project site on Oak Street.

8. *If the prevailing coverage on a block side on which the project is to be built is less than the zoning allows, then the new coverage should be similar to the prevailing.*

This guideline is not applicable. There are no contributing buildings on the block side of the Project site. Therefore there is no prevailing coverage. However, the coverage is similar to the contributing buildings across 20<sup>th</sup> Street.

9. *The arrangement of parts and the ornamentation of the components should reflect the character of the immediate surroundings and should be limited to adjacent blocks.*

The Project complies with this guideline. The design of the four town home buildings is inspired by the architecture of the contributing residential buildings on 20<sup>th</sup> Street. They are similar in size, scale, massing, and ornamentation.

10. *Many owners will wish to enlarge their houses by extending to the rear. In general, the HPOZ board would like to see the relationship of building to lot area not exceed 35%. It is important to retain rear area for backyard use.*

This guideline is not applicable to the Project because it is aimed at additions to single-family residences, not new construction. Furthermore, the intent is to minimize the encroachment of buildings into backyard areas that adjoin single-family properties. The Project site is not adjoining any single-family properties.

11. *New residential structures should harmonize in scale and massing with the existing historic structures in surrounding blocks. The property owner should provide an analysis of the building lot coverage to demonstrate that their proposal does not exceed the prevailing lot coverage on the block for the proposed development.*

The Project complies with this guideline. The Project site is in a transitional area between commercial and industrial uses along Washington Boulevard, a school along Oak Street, and residential uses on 20<sup>th</sup> Street. The building lot coverage of the historic buildings on Washington Boulevard is often 100 percent, as the buildings occupy the entire lot. No information was available for the school. However, a comparison with the building lot coverage of a school and any other use is unfair, given the state requirements for playground space. The building lot coverage of the houses on 20<sup>th</sup> Street ranges from 16 percent to 32 percent. However, this calculation is only an estimate and does not include garages. The total square footage of the Project site is 88,586. Six buildings are proposed with footprints of 17,508 square feet (Building #1), 18,624 square feet (Building #2), and 6,974 square feet (Buildings #3, #4, #5, and #6). Thus, the average building lot coverage for the Project is 48 percent, which is compatible with the surrounding blocks.

12. *Respect the prevailing setback, i.e., the most commonly occurring setback and lot coverage of the historic properties on the block face on which the building will be sited.*

There is only one historic property on the block face on the 20<sup>th</sup> Street side of the Project site, 945 W. 20<sup>th</sup> Street. Therefore there is no prevailing setback. However, the front yard setback is 19 feet, similar to the contributing buildings across 20<sup>th</sup> Street.

13. *If the historic development pattern for a vacant lot is known, new construction on the lot should be encouraged to follow this historic pattern.*

The Project complies with this guideline. The section of the Project site along 20<sup>th</sup> Street would be developed with relatively small-scale residential buildings, like the ones that existed historically.

14. *The property owner should provide an analysis of the building heights of contributing existing residential buildings with frontage on both sides of the block of the same street as the frontage of the subject lot, except for vacant lots, to demonstrate that their proposal does not exceed the prevailing height of these buildings.*

The Project complies with this guideline. The contributing residential buildings across 20<sup>th</sup> Street range in height from 30 to 35 feet. The height of the four town home buildings is approximately 35 feet in height.

#### Roof Forms

1. *Roofs on new residential structures should be consistent with the roof forms of the surrounding historic structures. The roof of a building should be similar in character to the roof structures on the block face. It is important that new roofs are similar to the prevailing roof form found with the HPOZ district.*

The Project complies with this guideline. The roofs will be gabled, like the contributing residential buildings on 20<sup>th</sup> Street.

2. *Flat roofs were uncommon in most single-family residences in this area historically and should be avoided for new residential construction.*

The Project complies with this guideline. The roofs would not be flat and would be gabled like the contributing residential buildings on 20<sup>th</sup> Street.

3. *Roofing materials should appear similar to those used traditionally in surrounding historic residential structures.*

Roofing materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

4. *Dormers and other roof features on new construction should be consistent with the size and placement of such features on historic structures within the HPOZ. Additional roof features should form a unified composition.*

The Project complies with this guideline. The roof features of the Project are similar to those found in Craftsman architecture and styles related to Craftsman architecture such as the Shingles style found in the HPOZ.

5. *In HPOZs where roof edge details, such as corbels, rafter tails, or decorative vergeboards are common, new construction should incorporate roof edge details, which echo these traditional details in a simplified form.*

The Project complies with this guideline. The roofs would be characterized by overhanging eaves, knee braces, and vergeboards, which are all typical of the Craftsman style.

6. *Roofs should be either gable, perpendicular or parallel to the street, or hip.*

The Project complies with this guideline, as the roofs would be gabled.

7. *The roof should be articulated with secondary roofs or rooftops elements such as dormers, room projections, and balconies projecting into or from the surface.*

The Project complies with this guideline. The major roof gable is side facing. Centered on the street-facing elevation, there is a front-facing gable. The front-facing gable covers approximately three-quarters of the elevation. The roofs are articulated in the apex of the gables by a change in materials and visually separated from the second story by moldings.

8. *Secondary roof elements should be used to indicate the location of entrances, porches and other major components of the exterior surface of the building.*

The Project complies with this guideline. The major roof gable is side facing. Centered on the street-facing elevation, there is a front-facing gable. The front-facing gable covers approximately three-quarters of the elevation. The front entryways are located to each side.

9. *Many gutter profiles are available to provide a compatible or matching design for external alterations. Selection of materials can be critical since plastic gutters may be shiny and seem quite different in appearance after installation. Locate down spouts at appropriate spacing for good drainage but avoiding conspicuous locations.*

Gutters and downspouts are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

10. *Although they do not have to copy the existing it is important that roofs reflect the prevailing roof form found in the area.*

The Project complies with this guideline. The roofs will be characterized by overhanging eaves, knee braces, and vergeboards, which are all typical of the Craftsman style.



11. *Additional roof features should form a unified composition.*

The Project complies with this guideline. The roof forms a unified composition. The roofs are the same on each of the town home buildings, and are complimentary to the window arrangement and features on the second story, which have hoods.

12. *Where the roof meets the vertical walls of a building, the roof should project from the vertical surfaces and create an overhang.*

The Project complies with this guideline, as the roofs would have overhanging eaves.

13. *Roof mounted equipment such as air conditioning and solar collectors are not allowed unless concealed from public view.*

HVAC equipment is not indicated on the plans. HVAC equipment would be screened pursuant to applicable LAMC requirements.

14. *Plastic gutters and downspouts are inappropriate.*

Gutters and downspouts are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

#### Openings

1. *New construction should have a similar façade solid-to-void ratio to those found in surrounding historic structures. Generally, large expanses of glass are inappropriate.*

The Project complies with this guideline. The solid-to-void ratio is similar to the contributing residential buildings on 20<sup>th</sup> Street and typical of the Craftsman style. There are no large expanses of glass.

2. *Windows should be similar in shape and scale to those found on adjacent and/or abutting historic structures.*

The Project complies with this guideline. The windows are similar to the contributing residential buildings on 20<sup>th</sup> Street in shape and scale.

3. *All windows should be in character with the particular style of the building. Windows should be consistent in materials and details throughout.*

The Project complies with this guideline. The windows are typical of the Craftsman style of the town home buildings and are consistent in materials and details on all four sides.

4. *The shapes, proportion, orientation, subdivision, and proportion of windows to the exterior surface area should be related to the building and secondly to other buildings on the block.*

The Project complies with this guideline. The windows are related to the town home buildings as well as the contributing residential buildings on 20<sup>th</sup> Street. They are mostly double-hung sash with a single pane in the lower sash and multiple panes in the upper sash.

5. *The size, scale and ornamentation of a building entrance should maintain the domestic image of the area.*

The Project complies with this guideline. Each building has two entrances on opposing ends of the street-facing elevations. They are similar in size, scale, and ornamentation to the contributing residential buildings on 20<sup>th</sup> Street.

6. *A main entrance should be from the main public street. Stairs, stoops, overhangs, and porches should be part of this entrance.*

The Project complies with this guideline. Each building has two entrances on opposing ends of the street-facing elevations. Each entrance is approached by a short flight of steps and sheltered by an overhanging roof.

7. *New buildings should provide an entrance element for each unit or groups of units that reflect the prevailing number of entrances on the side of the block on which the property is located.*

The Project complies with this guideline. Each building has two entrances on opposing ends of the street-facing elevations. Each entrance is approached by a short flight of steps and sheltered by an overhanging roof.

8. *The introduction of new rhythms or patterns to the arrangement of windows or other openings, such as the relationship between the width of window openings and the wall space between windows or walls without any openings, should remain consistent with the existing window arrangement.*

The Project complies with this guideline. Windows and doors are spaced evenly across the facades.

9. *Window articulation like decorative windows, a patterned sash, or predominantly double hung or casement windows on new infill Projects should remain consistent with the existing window details and style.*

This guideline seems to address additions and is therefore, not applicable to the Project.

10. *New windows should be wood-framed (with true-divided lights if desired) and proportional to the original window openings in the building. Aluminum windows should not be allowed within the district.*

Materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

11. *Secondary features such as shutters, railings, or exterior wall panels also contribute to the decoration and patterning of the exterior form, but the appropriate use of such elements should be carefully determined. Any window and door openings should align with the openings of the existing structure. Alignment of the top of door/window openings is important in evaluating the proposed design. Detailing and material of windows and doors should be specified to match existing, such as wood windows with genuine divided lights.*

This guideline seems to address additions and is therefore, not applicable to the Project.

12. *Burglar bars over windows and doors that are visible from the street are discouraged, unless the decorative design is compatible with the original design/style of house.*

The Project complies with this guideline. There would be no burglar bars over windows or doors.

13. *Place windows to promote privacy between properties.*

This guideline is not applicable to the Project. The four town home buildings are not next to any existing houses.

14. *Maintain privacy between houses when locating a new balcony that may overlook an existing patio or balcony.*

This guideline is not applicable to the Project. The four town home buildings are not next to any existing houses.

15. *A metal or wooden storm door and its frame should be painted in the same color as the main entry door and screen doors.*

This guideline is no applicable to the Project, because the Project does not include storm doors.

#### Materials and Details

1. *New construction should incorporate materials similar to those used traditionally in historic structures in the area. It is important to maintain a sense of authenticity of materials in the district. Accordingly, materials such as pressed hardboard or vinyl that replicate the appearance*

*of historical materials should not be allowed. New construction should incorporate materials similar to those used traditionally in historic structures in the district.*

Materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

2. *Materials used in new construction should be in units similar in scale to those used historically. For instance, bricks or masonry units should be of the same size as those used historically.*

Materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

3. *Architectural details such as newel posts, porch columns, rafter tails, etc., should be consistent with echo, but not exactly imitate, architectural details on adjacent and/or abutting surrounding historic structures.*

The Project is still in the preliminary design stage. The level of detail suggested by the guideline is not indicated on the plans. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

4. *The traditional architectural details found on historical structures add a sense of scale and texture to the construction. It is not necessary to replicate historic details, but new construction should include a similar level of and approach to detail.*

The Project is still in the preliminary design stage. The level of detail suggested by the guideline is not indicated on the plans. The Project's design would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

5. *Avoid long blank walls.*

The Project complies with this guideline. There are no long blank walls on any of the street-facing elevations.

6. *Each floor-to-floor division should be articulated on the building surface of the building. Horizontal bands, small curvatures of the wall surface at the floor line, roofs, bay windows, etc. should be used to detail the exterior of the building.*

The Project complies with this guideline. There is a plain fascia board between the first and second stories.

7. *Ornamentation of a building should be consistent in material and detailing throughout. New projects should reflect the prevailing ornamental character on the side of the block on which it is located.*

There is only one historic property on the block face on the 20<sup>th</sup> Street side of the Project site, 945 W. 20<sup>th</sup> Street. Therefore there is no prevailing ornamental character. However, the proposed buildings make reference to the contributing buildings across 20<sup>th</sup> Street in the form of the roofs, materials, color, fenestration pattern and type, and architectural features such as porches and chimneys.

8. *Buildings should have consistent materials throughout. The detailing, type and quality of materials should be similar on all sides of the project. The surface qualities of the materials should be similar in color, texture, scale, reflectance, and visual appearance as those found in the HPOZ district.*

Materials are not indicated on the plans. The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

9. *Keep the materials palette simple and appropriate to the house style.*

The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

10. *A minimum of three paint colors should be required. Body, trim and windows.*

Colors are not indicated on the plans. The Project is still in the preliminary design stage. Colors have not yet been selected. However, the Project Applicant will use a minimum of three paint colors.

11. *Staining of natural wood siding/shingle materials is recommended.*

Materials have not yet been selected. The Project is still in the preliminary design stage. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

12. *The color of the walls should dominate the house's appearance more than trim and door color. A muted tone for the base color is the wisest choice and will be the best complement to any bright colors you may choose to emphasize the trim of your home and this will determine how the house harmonizes with its neighbors.*

The Project is still in the preliminary design stage. Colors have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

13. *When you are painting, remember that the roof is a part of your color scheme and must relate to the rest of the house. Similarly, when you are roofing, choose a dark or neutral material that does not “compete” with the other house colors.*

The Project is still in the preliminary design stage. Materials have not yet been selected. The Project’s design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

14. *Color has its greatest clarity when seen alone, or against a background of white, black, grey, or a muted tone. Two strong colors may not be effective on a building style. If you use more than two colors you can take away the effect of each color alone and create a garish look.*

The Project is still in the preliminary design stage. Colors have not yet been selected. The Project’s design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

15. *Very bright colors, especially if a high gloss paint is used, are best avoided altogether. However, a semi-gloss bright colored door, when other colors on the house enhance it, can be very effective.*

The Project is still in the preliminary design stage. Colors have not yet been selected. The Project’s design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

#### *Commercial/Industrial Design Guidelines – Infill*

##### Location and Site Design

1. *The facades of new structures in commercial/industrial areas should maintain the setback of existing historic structures along the street front.*

The Project does not comply with this guideline. There is a 15-foot setback along Washington Boulevard pursuant to the LAMC for multi-family residential buildings. As such, the guideline is inconsistent with the LAMC.

2. *New structures should reflect the prevailing widths on the street frontages of contributing commercial historic structures in the HPOZ.*

There are two contributing commercial buildings near the Project site: the Giroux Glass Company at 850 Washington Boulevard and the Casa Camino Real at 1828 Oak Street. The approximate width to the Giroux Glass Company building is approximately 50 feet, while the approximate width of the Casa Camino Real is approximately 105 feet. In addition, there is a contributing church building across Washington Boulevard from the Project site that is approximately 50 feet in width. As the condominium building facing Washington Boulevard is approximately 125 feet in width, the Project does not comply

with this guideline. The Oak Street frontage faces the Norwood School, which is a non-contributing building. Therefore, the Oak Street frontage need not comply with this guideline.

3. *New structures should be built to maintain the street wall, without side setbacks.*

The Project does not comply with this guideline. There is a 15-foot setback along Washington Boulevard pursuant to the LAMC for multi-family residential buildings. As such, the guideline is inconsistent with the LAMC.

4. *Parking areas should be located to the rear or side of new structures.*

This guideline apparently did not anticipate that infill projects would have subterranean parking. The intent of this guideline was, no doubt, for surface parking to not be located in front of new structures. Therefore, the Project complies with this guideline.

5. *New parking areas should be screened from public view by means of fences or plantings along the street wall.*

The Project complies with this guideline as the parking is subterranean and cannot be viewed by the public.

6. *At corner sites, the new façade should be aligned along sidewalk edges on both streets. Special design treatments of corner historically included rounded and deviled features and corner tower elements.*

As the condominium building facing Washington Boulevard turns the corner of Oak Street, it retains the aforementioned 15-foot setback and the design does not include any corner elements such as towers. Therefore, the Project does not comply with this guideline.

7. *Entrances for main and secondary uses should face onto street fronts. Common lobbies opening to parking are preferred.*

Both condominium buildings have main entrances facing the street fronts, Washington Boulevard and Oak Street. The intent of having common lobbies opening onto parking is unclear and may be more applicable to commercial/industrial uses.

#### Building Mass, Scale, and Form

1. *New structures should maintain the average scale of height and width of contributing historic structures within the HPOZ.*

The condominium building facing Washington Boulevard is similar in scale to the contributing buildings in the vicinity; the church at 901 West Washington Boulevard and Casa Camino Real at 1828 Oak Street. The church has an irregular roofline but is approximately 40 feet in height, 50 feet in width and 140 feet in length. The Casa Camino Real is approximately 90 feet in height, 105 feet in width, and 175 feet in

length. The condominium building facing Washington Boulevard is approximately 65 feet in height, 125 feet in width, and 190 feet in length. The condominium building facing Oak Street is smaller. It is approximately 40 feet in height, 125 feet in width, and 169 feet in length.

2. *New structures taller than existing historic commercial/industrial structures in the HPOZ should be designed to be compatible with the existing cornice heights on contributing structures in the HPOZ. All portions of buildings above the prevailing height, for contributing buildings with frontage on both sides of the block of the same street as the frontage of the subject lot, should be set back from the façade to be more compatible.*

This guideline is not applicable to the Project because there are no adjacent contributing buildings.

3. *Commercial/industrial properties sharing a property line with residential uses should maintain code-regulated setbacks to reduce the scale and massing along shared lot lines.*

This guideline is not applicable to the Project. While the Project is subject to the Commercial/Industrial Infill Guidelines, it is entirely residential and maintains code-regulated setbacks.

4. *The basic building form for new commercial/industrial structures should be a single rectangular solid.*

This guideline is not applicable because the condominium buildings are not commercial/industrial structures. However, they appear to have single rectangular footprints from the public right-of-way. Therefore, the Project complies with the spirit of this guideline.

5. *New commercial/industrial structures should attempt to reflect the traditional commercial storefront widths in the historic commercial/industrial HPOZ districts.*

This guideline is not applicable to the Project. While the Project is subject to the Commercial/Industrial Infill Guidelines, it is entirely residential and does not include storefronts. Furthermore, many of the contributing buildings on Washington Boulevard were mortuaries and did not include commercial storefronts.

6. *A flat roof is the preferred roof form.*

The condominium buildings are mostly covered by flat roofs, however, the bays at corners and entrances are covered by low-pitched, hipped roofs. Therefore, the Project complies with the spirit of this guideline.



### Materials and Details

1. *Building materials should be similar to those used historically, such as brick, stone, metal, stucco, and wood. Concrete block is inappropriate.*

The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

2. *New construction should incorporate and articulate horizontal and vertical subdivisions with plane changes, materials changes, window groupings, floor-to-floor divisions and cornice treatments to establish scale and interest.*

The Project complies with this guideline. The condominium buildings are divided horizontally by a change in materials and molding at the ground and top floors. Windows and balconies are stacked vertically, creating a pattern of solids and voids. Changes in wall planes occur at corner and entrances, which project slightly from the main building mass.

3. *Architectural details should replicate, but should not exactly mimic, details found on historic facades.*

The Project is still in the preliminary design stage. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

4. *The colors and finish of permanent finish materials, such as brick, tile, and stucco, should be similar to those used historically.*

The Project is still in the preliminary design stage. Materials have not yet been selected. The Project's design, including materials, would be subject to HPOZ design review, and details such as these would be finalized to the satisfaction of the HPOZ Board to ensure substantial compliance with the guidelines.

5. *The use of architectural detail to break up the visual mass of outsized buildings is encouraged.*

The facades of the condominium buildings facing Washington Boulevard and Oak Street are broken by projecting bays. The design of the Project was developed in close consultation with the Department of City Planning.

### Openings, Storefronts, and Entries

1. *On the ground floor of new commercial/industrial structures, a majority of the primary architectural façade should replicate traditional storefronts.*

This guideline is not applicable to the Project. While the Project is subject to the Commercial/Industrial Infill Guidelines, it is entirely residential and does not include storefronts. Furthermore, many of the

contributing buildings on Washington Boulevard were mortuaries and did not include commercial storefronts.

2. *The ground floor of the primary architectural façade should be composed primarily of transparent elements. The historic pattern of the structural bay design for storefront is encouraged.*

This guideline is not applicable to the Project. While residential projects in commercial and industrial zones are supposed to adhere to the Commercial/Industrial Infill Guidelines, they clearly did not anticipate privacy issues required for ground floor residential units. Furthermore, the nearby contributing buildings on Washington Boulevard are not composed primarily of transparent elements.

3. *Recessed entryways are strongly encouraged for primary entrances on the ground floor level.*

The Project complies with this guideline. There is one main entrance on Washington Boulevard and two on Oak Street, all of which are recessed.

4. *Primary entryways should be clearly marked through the use of important defining architectural elements, such as transoms, awnings, lintels, or surrounds.*

The Project complies with this guideline. Each of the three main entryways is situated in a slightly projecting bay, which rises slightly above the adjoining flat roofline and is capped by a low-pitched, hipped roof. The entryways in the building that faces Washington Boulevard are grand archways. The entryway in the condominium building along Oak Street is scaled to the smaller size of the building and is marked by a pent roof.

5. *Upper story windows should be regularly spaced and horizontally massed, have appropriate size, style, and proportions on the primary architectural façade.*

The Project complies with this guideline. The windows are regularly spaced. They are stacked vertically and the floors are clearly distinguishable. The ratio of solids to voids is consistent with the period revival architecture in the HPOZ.

6. *On structures occupying corner lots, corner entryways with strong design elements should be encouraged. Entrances for main and secondary (upper) uses should face onto street fronts. Common lobbies opening to parking are preferred.*

As previously stated, both condominium buildings have main entrances facing the street fronts, Washington Boulevard and Oak Street. The intent of having common lobbies opening onto parking is unclear and may be more applicable to commercial/industrial uses.

7. *Roll down shutters should be concealed behind the façade. Open grille-type shutters are recommended.*

This guideline is not applicable to residential buildings.

8. *Awnings and marquees at entries were traditional to protect pedestrians and define entrance on façade. Awnings should follow guidelines set out in 9.2 Storefronts.*

This guideline is not applicable to residential buildings.

9. *New skylights should be low profile metal and glass style.*

The condominium buildings do not have skylights.

10. *Signage on commercial/industrial infill structures should follow the signage guidelines laid out in the commercial/industrial rehabilitation section.*

This guideline is not applicable to residential buildings.

### ***Summary***

The project's design details have yet to be determined, but they would be subject to HPOZ design review. By the efforts of the Applicant and through the HPOZ design review process, substantial compliance with the guidelines is ensured.

The two main aspects of the Project that do not comply with the Preservation Plan is the lot coverage of the four town home buildings and the set back of the two condominium buildings. The lot coverage of the four town home buildings is greater than the historical development pattern of the HPOZ. However, this is not obvious from the public right-of-way. The four town homes occupy a larger percentage of the lot than what is typical in the HPOZ because the building footprints extend into the rear yards. The set back of the two condominium buildings is greater than the guideline for Commercial/Industrial Design Infill because the code requirement is 15 feet for multi-family residential buildings. As such, the guideline is inconsistent with the code. In some cases the guidelines are not applicable because they are related to features on commercial or industrial buildings such as storefronts, not multi-family residential buildings. In conclusion, as the Project would effectively conform to the letter and spirit of the Preservation Plan Design Guidelines, impacts to the University Park HPOZ would be less than significant.

## **CUMULATIVE IMPACTS**

Cumulative impacts on historic resources evaluate whether impacts of the Project and related projects, when taken as a whole, substantially diminish the number of extant resources within the same or similar context or property type. It is not known at this time if future development of the related Project sites would involve historic resources. However, it is anticipated that if historic resources are potentially affected, the related projects would be subject to the requirements of CEQA and City historic resource protection ordinances. It is further anticipated that the effects of cumulative development on historic resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Consequently, cumulative impacts on historic resources as a result of related project development are expected to be less than significant and thus, when evaluated in conjunction with the

Project would not be cumulatively considerable. Development of the related projects would also require grading and excavation that could potentially affect archaeological, paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources, if these resources are not protected upon discovery. CEQA requirements for protecting archaeological, paleontological resources and human remains are applicable to development in the City, as are local cultural resource protection ordinances. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would be cumulatively less than significant and would not be cumulatively considerable.

## **MITIGATION MEASURES**

No significant impacts related to cultural resources have been identified, and no mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts to cultural resources would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### E. GREENHOUSE GAS EMISSIONS

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This section provides a discussion of global climate change, existing regulations pertaining to global climate change, an inventory of the approximate greenhouse gas (GHG) emissions that would result from the Proposed Project, and an analysis of the significance of the impact of these GHGs.

#### ENVIRONMENTAL SETTING

The earth's natural warming process is known as the "greenhouse effect." This greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into the Earth's atmosphere, but prevents radiative heat from escaping, thus warming the Earth's atmosphere. GHGs keep the average surface temperature of the Earth close to a hospitable 60 degrees Fahrenheit. However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste.

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.<sup>1</sup> While the increase in temperature is known as "global warming," the resulting change in weather patterns is known as "global climate change." Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

#### GHG Components

GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride.<sup>2</sup> CO<sub>2</sub> is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential than CO<sub>2</sub>. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary anthropogenic sources of GHG emissions. A general description of the GHGs discussed is provided in Table IV.E-1.

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<sup>1</sup> *Climate Change 101: Understanding and Responding to Global Climate Change, published by the Pew Center on Global Climate Change and the Pew Center on the States.*

<sup>2</sup> *As defined by California AB 32 and SB104.*

**Table IV.E-1**  
**Description of Identified Greenhouse Gases**

<b>Greenhouse Gas</b>	<b>General Description</b>
<b>Carbon Dioxide (CO<sub>2</sub>)</b>	An odorless, colorless GHG, which has both natural and man made sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Human sources of carbon dioxide are burning coal, oil, natural gas, and wood.
<b>Methane</b>	A flammable gas, and the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. There are no ill health effects from methane. A natural source of methane is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources include landfills, fermentation of manure, and cattle.
<b>Nitrous Oxide (N<sub>2</sub>O)</b>	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
<b>Hydrofluorocarbons (HFCs)</b>	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987.
<b>Perfluorocarbons (PFCs)</b>	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
<b>Sulfur Hexafluoride (SF<sub>6</sub>)</b>	An inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF <sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
<i>Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.</i>	

### Global Warming Potential

Global Warming Potentials (GWPs) are a simplified index based upon radiative properties that can be used to estimate the potential future impacts of emissions of different gases upon the climate system, relative to a reference gas (usually CO<sub>2</sub>). The GWP of a gas is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of the gas relative to that of CO<sub>2</sub>, as well as the decay rate of the gas (the amount removed from the atmosphere over a given number of years) relative to that of CO<sub>2</sub>. In order to obtain the CO<sub>2</sub>e, an individual GHG is multiplied by its GWP. The GWP designates, on

a pound for pound basis, the potency of the GHG compared to CO<sub>2</sub>. A summary of the atmospheric lifetime and GWP of selected gases is presented at Table IV.E-2. As indicated, GWP ranges from 1 (CO<sub>2</sub>) to 23,900 (SF<sub>6</sub>).

**Table IV.E-2**  
**Atmospheric Lifetimes and Global Warming Potentials**

<b>Gas</b>	<b>Atmospheric Lifetime (years)</b>	<b>Global Warming Potential (100 year time horizon)</b>
Carbon Dioxide	50 – 200	1
Methane	12 (+/-3)	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF <sub>4</sub> )	50,000	6,500
PFC: Hexafluoroethane (C <sub>2</sub> F <sub>6</sub> )	10,000	9,200
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	23,900
<i>Source: IPCC, 2006.</i>		

### **Projected Impacts of Global Warming in California**

According to the 2006 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated changes in climate. As stated in the 2006 CAT Report, there are uncertainties associated with characterizing the timing and magnitude of other consequences of a warmer planet, including but not limited to: sea level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, air pollution episodes, and the impact of these effects on human health and the economy.<sup>3</sup>

### **California-Specific Adaptation Strategies**

Because climate change is already affecting California and current emissions will continue to drive climate change in the coming decades, regardless of any GHG emissions reduction measures that may be adopted, the necessity of adaptation to the impacts of climate change is recognized by the State of California. The 2009 *California Climate Adaptation Strategy* initiated what is an ongoing process of

<sup>3</sup> California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 16.



adaptation, as directed by Executive Order S-13-08.<sup>4</sup> The goals of the strategy are to analyze risks and vulnerabilities and identify strategies to reduce the risks. Once the strategies are identified and prioritized, government resources would be identified. Finally, the strategy includes identifying research needs and educating the public.

Climate change risks are evaluated using two distinct approaches: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human system's ability to cope with and adapt to change by examining past experience with climate variability and extrapolating this to understand how the systems may respond to the additional impact of climate change. The major anticipated climate changes expected in California include increases in temperature, decreases in precipitation, particularly as snowfall, and increases in sea level, as discussed above. These gradual changes are expected to lead to an increasing number of extreme events, such as heat waves, wildfires, droughts, and floods. These effects would impact public health, ocean and coast resources, water supply, agriculture, biodiversity, and transportation and energy infrastructure.

Key preliminary adaptation recommendations included in the *Strategy* are as follows:

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

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<sup>4</sup> The California Natural Resources Agency issued a 2010 Progress Report on the California Climate Adaptation Strategy. For a complete discussion on the progress report, please refer to <http://www.climatechange.ca.gov/adaptation/>.

- Inclusion of climate change impact information into fire program planning by state fire fighting agencies.

### Existing Site Emissions

The Project site is currently comprised of 10 separate parcels totaling approximately 2.03-acres. Development on the Project site consists of a one-story commercial catering facility and an associated surface parking lot. GHG emissions are currently generated at the Project site by stationary sources, such as space and water heating, electricity demand, solid waste generation, water consumption, and motor vehicle traffic traveling to and from the Project site. The annual GHG emissions generated by the existing uses at the Project site have been estimated utilizing the California Emissions Estimator Model (CalEEMod) computer model recommended by the SCAQMD. Table IV.E-3 presents the GHG emissions associated with existing operations of the Project site. As shown in Table IV.E-3, the existing operations on the Project site generate approximately 731.22 CO<sub>2</sub>e MTY.

**Table IV.E-3**  
**Existing Project Site Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>
Natural Gas Consumption	7.24
Electricity Demand	101.01
Solid Waste Generation	5.22
Water Consumption	26.46
Motor Vehicles	591.29
<b>Total</b>	<b>731.22</b>
<i>Source: Parker Environmental Consultants, September 2012. Calculation data and results provided in Appendix IV.E to this Draft EIR.</i>	

### Existing Statewide Greenhouse Gas Emissions

The California Air Resources Board published *California Greenhouse Gases Inventory: 2000 to 2009* in December 2011. In 2009, total California GHG emissions were 457 million tons of carbon dioxide equivalent (MMTCO<sub>2</sub>e); net emissions were 453 MMTCO<sub>2</sub>e, reflecting the influence of sinks (net CO<sub>2</sub> flux from forestry). While total annual emissions have increased by 5.5 percent from 1990 to 2009, emissions decreased by 5.8 percent from 2008 to 2009 (485 to 457 MMTCO<sub>2</sub>e). The total net annual emissions between 2000 and 2009 decreased from 459 to 453 MMTCO<sub>2</sub>e, representing a 1.3 percent decrease from 2000 and a 6.1 percent increase from the 1990 emissions level. During this period, the transportation sector accounted for approximately 38 percent of the total emissions, while the industrial sector accounted for approximately 20 percent. Emissions from electricity generation were about 23 percent with almost equal contributions from in-state and imported electricity.

## REGULATORY FRAMEWORK

In response to growing scientific and political concern about global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHGs to the atmosphere.

### Federal

#### *Federal Clean Air Act*

In the past, the U.S. EPA has not regulated GHGs under the Clean Air Act because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate change. However, in 2007 the U.S. Supreme Court held that the U.S. EPA must consider regulation of motor-vehicle GHG emissions.<sup>5</sup> The Court ruled that GHGs fit within the Clean Air Act's definition of a pollutant and that the U.S. EPA did not have a valid rationale for not regulating GHGs. In December 2009, the U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act. This is the first step in regulating GHGs under the provisions of the Clean Air Act. In addition, on September 15, 2009, the National Highway Traffic Safety Administration (NHTSA) and U.S. EPA announced a proposed joint rule that would explicitly tie fuel economy to GHG emissions reductions requirements. The proposed new Corporate Average Fuel Economy ("CAFE") Standards would cover automobiles for model years 2012 through 2016, and would require passenger cars and light trucks to meet a combined, per-mile, CO<sub>2</sub> emissions level. It is estimated that by 2016, this GHG emissions limit could equate to an overall light-duty vehicle fleet average fuel economy of as much as 35.5 miles per gallon. On November 16, 2011, U.S. EPA and NHTSA issued a joint proposal to extend the national program of harmonized GHG and fuel economy standards to model year 2017 through 2025 passenger vehicles.

### State

#### *California Global Warming Solutions Act*

In response to growing scientific and political concern with global climate change, California has adopted a series of laws to reduce emissions of GHGs to the atmosphere from commercial and private activities within the State. In September 2002, then-Governor Gray Davis signed Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. On June 1, 2005, California Governor Arnold Schwarzenegger announced, through Executive Order S-3-05, the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. In response to the Executive Order, the Secretary of Cal/EPA created the Climate Action Team (CAT), which, in March 2006, published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report identified a

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<sup>5</sup> *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007))

recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires CARB, the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. As the intent of AB 32 is to limit 2020 emissions to the equivalent of those from 1990, it is expected that the regulations would affect many existing sources of GHGs and not just new general development projects.

As a central requirement of AB 32, the CARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by CARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Proposed Scoping Plan was approved by CARB on December 11, 2008. The measures in the Scoping Plan would be developed over the next year and be in place in 2012. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED 2011 Scoping Plan).<sup>6</sup> CARB's updated projected "business as usual" (BAU) emissions in the 2011 Scoping Plan are based on current economic forecasts (i.e., as influenced by the economic downturn) and certain GHG reduction measures already in place. The BAU projection for 2020 GHG emissions in California was originally estimated to be 596 MMTCO<sub>2</sub>E. The updated calculation of the 2011 Scoping Plan's estimates for projected emissions in 2020, as of October 2010 based on current economic forecasts,

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<sup>6</sup> *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, CARB, August 19, 2011.*

totals 506.8 MMTCO<sub>2</sub>E (or approximately 507 MMTCO<sub>2</sub>E). Considering the updated BAU estimate of 507 MMTCO<sub>2</sub>E by 2020, CARB estimates a 16 percent reduction below the estimated statewide BAU levels would now be necessary to return to 1990 emission levels (i.e., 427 MMTCO<sub>2</sub>E) by 2020, instead of the 28.35% BAU reduction previously reported under the 2008 Scoping Plan.<sup>7</sup> This revised estimate is summarized in Table IV.E-4.

**Table IV.E-4**  
**Estimate of Emissions Reductions Needed from 2011 Scoping Plan Measures Not Yet In Place**

<b>Emission Category</b>	<b>GHG Emissions (MMTCO<sub>2</sub>E)</b>
<b>2008 Scoping Plan</b>	
2020 BAU Forecast (CARB 2008 Scoping Plan)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
<b>Reduction below Business As Usual necessary to achieve 1990 levels by 2020</b>	<b>169(28.35%)<sup>a</sup></b>
<b>2011 Scoping Plan</b>	
Revised 2020 BAU Forecast (CARB 2011 Scoping Plan)	507
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
<b>Percent Reduction below Business As Usual necessary to achieve 1990 levels by 2020</b>	<b>80 (16%)<sup>b</sup></b>
<sup>a</sup> $596 - 427 = 169 / 596 = 28.35\%$ <sup>b</sup> $507 - 427 = 80 / 507 = 15.779\%$ (or approximately 16%). Source: Data derived from Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, Table 1.2-3 and page 11, CARB, August 19, 2011.	

The mix of measures in the Scoping Plan provides a comprehensive approach to reduce emissions to achieve the 2020 target, and to initiate the transformations required to achieve the 2050 target set forth in Executive Order S-03-05 (80% below 1990 levels by 2050). The Cap-and-Trade Program included in the Scoping Plan would cover about 85 percent of GHG emissions throughout California's economy. The inclusion of many of these emissions within the Cap-and-Trade Program, along with a margin of safety in the uncapped sectors, will ensure that the 2020 target is met.

### ***SB 97 & CEQA Guidelines***

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), requiring the Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or

<sup>7</sup> Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, page 11, CARB, August 19, 2011.

the effects of GHG emissions to the Resources Agency by July 1, 2009. Following receipt of these guidelines, the Resources Agency was required to certify and adopt the guidelines prepared by OPR by January 1, 2010.

OPR submitted its proposed guidelines to the Secretary for Natural Resources on April 13, 2009. The Natural Resources Agency undertook the formal rulemaking process to certify and adopt the amendments as part of the state regulations implementing CEQA. The CEQA Guidelines Amendments were adopted on December 30, 2009 and became effective on March 18, 2010.

The CEQA Guideline Amendments do not specify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but rely on the lead agencies in making their own significance threshold determinations based upon substantial evidence. The CEQA Guidelines Amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

#### ***Title 24 Energy Efficiency Standards***

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

The most recent update to Title 24 was adopted by the CEC on April 23, 2008. The requirement for when the 2008 standards must be followed is dependent on when the application for the building permit is submitted. If the application for the building permit is submitted on or after January 1, 2010, the 2008 standards must be met. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

#### ***California Green Building Standards***

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code is a Code with mandatory requirements for State-regulated buildings and structures throughout California beginning on January 1, 2011. The 2010 CALGreen Code contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The Code also requires building commissioning, which is a process for the verification that all building

systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

## **Local**

### ***SCAQMD***

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions and local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary. See Section IV.C (Air Quality) of this Draft EIR for a complete discussion on the SCAQMD regulatory authority.

### ***City of Los Angeles***

#### *City of Los Angeles General Plan - Air Quality Element*

The Air Quality Element of the City of Los Angeles General Plan was adopted on November 24, 1992 and sets forth the goals, objectives and policies that will guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents is crucial to the achievement of state and federal air quality standards.

The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. According to the Air Quality Element, mutually reinforcing strategies need to be developed which work to reduce the use of single occupant vehicles and which work to reduce vehicle trips and vehicle miles traveled.

As it relates to GHG emissions, the Air Quality Element establishes the following relevant goals and objectives:

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.

Objective 3.1: It is the objective of the City of Los Angeles to increase the portion of work trips made by transit to levels that are consistent with the goals of the Air Quality Management Plan and the Congestion Management Plan.

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.

Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.

#### *City of Los Angeles Green LA Action Plan*

The City of Los Angeles is addressing the issue of global climate change through implementation of the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, Los Angeles is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

#### *City of Los Angeles Green Building Code*

In order to further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects. Accompanying the first of these ordinances, the City Planning Department's Recommendation Report<sup>8</sup> summarized how green building

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<sup>8</sup> *Los Angeles Department of City Planning Recommendation Report, a proposed ordinance amending the Los Angeles Municipal Code to establish a Green Building Program which shall include a Standard of Sustainability and Standard of Sustainable Excellence, November 15, 2007, CPC-2007-4749-CA, Jane Blumenfeld, Principal City Planner, and Claire Brown, AICP, Project Manager.*



techniques establish a means to tackle a variety of sustainability issues as outlined in the LA Green Plan. Specifically, part of the report states:

*Green building is increasingly being used as a tool by local governments to reduce the environmental impact of building projects in a structured and quantifiable fashion. Municipalities across the country, including Los Angeles, have established policies to build public facilities to green building standards. An increasing number have begun to implement policies that encourage and/or require private sector developments to be built to green building standards. Additionally, statewide efforts are underway to develop green building codes. Furthermore, the recently adopted California Global Warming Solutions Act of 2006 (AB 32) is likely to place increased emphasis on carbon emissions reductions and avoidance. These trends and efforts speak to the importance of the City establishing local guidance and demonstrating leadership on green building within Los Angeles.*

Below is a brief summary of the history of the City's green building ordinances, including the currently applicable Los Angeles Green Building Code.

On April 22, 2008, the Los Angeles City Council approved Ordinance No. 179820 (the LA Green Building Ordinance). The goal of the LA Green Building Ordinance is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems. To achieve these goals, it must be demonstrated that certain projects in the City meet the intent of the criteria for certification at the Leadership in Energy and Environmental Design (LEED®) certified level.

On December 15, 2010, the Los Angeles City Council approved Ordinance No. 181479, amending Sections 12.03, 12.07, 12.07.01, 12.07.1, 12.08, 16.10, and 16.11 of the Los Angeles Municipal Code (LAMC) to sunset, modify and/or transfer oversight of green building-related programs in order to streamline case processing in light of the California Green Building Standards Code anticipated to take effect on January 1, 2011. Specifically, as it relates to the original Green Building Ordinance 179820, references to the U.S. Green Building Council's (USGBC) LEED® Certification at the Silver level or higher described in Subsection E shall no longer apply to projects filed on or after January 1, 2011. Projects filed on or after January 1, 2011 must satisfy the LA Green Building Ordinance, as defined in Los Angeles Municipal Code Section 99.01.101.1, Tier 1 or higher in order to obtain expedited processing as described in Subsection 5.

Also on December 15, 2010, the Los Angeles City Council approved Ordinance No. 181480, which incorporates various provisions of the 2010 CALGreen Code into the LAMC. Specifically, these regulations are now known as the Los Angeles Green Building Code. This code is Article 9 of a total of nine Articles of Chapter IX of the LAMC and adopts by reference the CALGreen Code except as amended therein. The provisions of the Los Angeles Green Building Code apply to the construction of every new building, every building alteration with a building permit valuation of over \$200,000, and every building addition, unless otherwise indicated in the code, throughout the City of Los Angeles.

Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings.

## ENVIRONMENTAL IMPACTS

### Methodology

The California Climate Action Registry (CCAR) General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.<sup>9</sup>

CARB believes that consideration of so-called indirect emissions provides a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.<sup>10</sup> CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the OPR has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate...GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”<sup>11</sup> Therefore, direct and indirect emissions have been calculated for the Proposed Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing “new” GHG emissions. Whether this represents a net global increase, reduction, or no change depends on the GHGs that would exist if the project were not implemented.

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<sup>9</sup> Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

<sup>10</sup> CARB, *Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.*

<sup>11</sup> OPR Technical Advisory, p. 5.

### ***Construction***

Construction emissions were calculated using the California Emissions Estimator Model (CalEEMod Version 2011.1.1), which is based on OFFROAD2007 model outputs. OFFROAD2007 is an emissions estimation model developed by CARB to calculate emissions from off-road road equipment, including construction equipment. The output values used in this analysis were modeled to be project-specific, based on equipment mix, usage rates (hours per day), and length of construction schedule. For a complete discussion of these construction assumptions, please refer to Section IV.C, Air Quality, of this Draft EIR. The mobile source emission methodology for on-road construction emissions, associated with worker commute and delivery of materials, uses a vehicle miles traveled rate calculated by CalEEMod in order to generate values for annual emissions. Emission factors are derived from the EMFAC2007 model using light duty automobile factors for worker commute and heavy-duty truck factors for deliveries.

The most common GHGs emitted in association with the construction of land use developments include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). CalEEMod provides these GHGs and converts them into carbon dioxide equivalent (CO<sub>2</sub>e) based on their GWP. CalEEMod uses GWP from the IPCC Second Assessment Report (SAR), shown in Table IV.E-2, above.

### ***Operation***

CalEEMod Version 2011.1.1 was used to calculate the energy use and potential emissions generated by implementation of the Proposed Project. These factors include motor vehicles, electricity, natural gas, water usage/wastewater generation, hearth combustion, landscaping/maintenance equipment, and solid waste generation and disposal.

Motor vehicle emission calculations associated with operation of the Proposed Project use a projection of annual vehicle miles travelled (VMT), which is derived from the trips provided in the project traffic study and the default trip characteristics in CalEEMod. These values account for the daily and seasonal variations in trip frequency and length associated with travel to and from the Project Site and other activities that require a commute.

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. Combustion of any type of fuel emits criteria pollutants and GHGs directly into the atmosphere; when this occurs in a building this is a direct emission source associated with that building and CalEEMod calculates all of these pollutants. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used, the electricity generation typically takes place offsite at a power plant; electricity use generally causes emissions in an indirect manner and therefore GHG emissions have been calculated from electricity generation.

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. It will often be the case that the water treatment and wastewater treatment occur outside of the project area. Where this is the case, it is still appropriate to quantify the energy and associated GHG

emissions attributable to the water use. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both methane and nitrous oxide. Thus, GHG emissions have been calculated from water used and wastewater generated by the Proposed Project.

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. The program quantifies the GHG emissions associated with the decomposition of the waste that generates methane based on the total amount of degradable organic carbon. The program will also quantify the CO<sub>2</sub> emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations were used as reported in Section 2.4 of AP-42.<sup>12</sup> The IPCC has a similar method to calculate GHG emissions from MSW in its 2006 Guidelines for National Greenhouse Gas Inventories.

Planting trees sequesters CO<sub>2</sub> and results in a one-time carbon-stock change. Trees sequester CO<sub>2</sub> while they are actively growing. The amount of CO<sub>2</sub> sequestered depends on the type of tree. CalEEMod uses default annual CO<sub>2</sub> accumulation per tree for certain broad species classes.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. The emissions associated from landscape equipment use was processed using OFFROAD 2007 and ARB's Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003).

### **Thresholds of Significance for Project and Cumulative GHG Impacts**

A development project's GHG emissions typically would be relatively very small in comparison to state and global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on global climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions should determine whether a project's contribution to global climate change is "cumulatively considerable." Many air quality agencies concur (SCAQMD, SLVAPCD, etc.) that GHG and climate change should be evaluated as a cumulative impact, rather than as a project-specific and direct impact.

The Los Angeles *CEQA Thresholds Guide* does not provide guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the CEQA Guidelines

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<sup>12</sup> See AP-42, Fifth Edition, *Compilation of Air Pollutant Emission Factors*, prepared by the Office of Air Quality Planning and Standards, U.S. EPA, January 1995.

Amendments adopted by the Natural Resources Agency on December 30, 2009 provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs.

Specifically, Section 15064.4 of the CEQA Guidelines entitled "Determining the Significance of Impacts from Greenhouse Gas Emissions" states the following:

(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

(1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitation of the particular model or methodology selected for use; and/or

(2) Rely on a qualitative analysis or performance based standards.

(b) A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effect of a project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Finally, Appendix G of the State CEQA Guidelines state that a project could have a significant environmental impact if it would:

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant

impact on the environment; or

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

Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a residential project's generation of GHG emissions, the following analysis is based on a combination of the requirements outlined in the above summarized CEQA Guidelines. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination considering the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Additional factors considered by the City as Lead Agency in determining the significance of the Project's GHGs are discussed below. As a central component of the CEQA Guidelines, there is substantial evidence to support that compliance with the LA Green Building Code is qualitatively consistent with applicable statewide, regional, and local goals and policies in place for the reduction of GHG emissions, including, but not limited to, AB 32 and the corresponding Scoping Plan. As stated on page 27 of the 2008 Scoping Plan, CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020. Consistent with CARB's recommendation, the City adopted the LA Green Plan to provide a citywide municipal plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. According to the LA Green Plan, Los Angeles is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels. In order to further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects. As it relates to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City of Los Angeles. Among the many GHG reduction measures outlined later in this Section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. Thus, the City's Green Building Code is consistent with the Scoping Plan's recommendation for communities to adopt building codes that go beyond the state code.

## Compliance Measures

The Project would be required to implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's GHG emissions. Specifically, the following Compliance Measure has been identified for the Proposed Project:

- The Project Applicant shall implement the following mandatory measures of the LA Green Building Code (table references are to the Green Building Code):

### **99.04.1 06.2. Storm Water Drainage and Retention During Construction.**

In order to manage stormwater drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion and retain soil runoff on the site:

1. Retention basins of sufficient size shall be utilized to retain stormwater on the site;
2. Where stormwater is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the Department; or
3. Compliance with City of Los Angeles' stormwater management ordinance(s).

### **99.04.106.6. Electric Vehicle Supply Wiring.**

1. For one- or two- family dwellings and townhouses, provide a minimum of:
  - a. One 208/240 V 40 amp, grounded AC outlet, for each dwelling unit; or
  - b. Panel capacity and conduit for the future installation of a 208/240 V 40 amp, grounded AC outlet, for each dwelling unit. The electrical outlet or conduit termination shall be located adjacent to the parking area.
2. For other residential occupancies where there is a common parking area, provide one of the following:
  - a. A minimum number of 208/240 V 40 amp, grounded AC outlets equal to 5 percent of the total number of parking spaces. The outlets shall be located within the parking area; or
  - b. Panel capacity and conduit for future installation of electrical outlets. The panel capacity and conduit size shall be designed to accommodate the future installation, and allow the simultaneous charging, of a minimum number of 208/240 V 40 amp, grounded AC outlets, that is equal to 5 percent of the total

number of parking spaces. The conduit shall terminate within the parking area;  
or

c. Additional service capacity, space for future meters, and conduit for future installation of electrical outlets. The service capacity and conduit size shall be designed to accommodate the future installation, and allow the simultaneous charging, of a minimum number of 208/240 V 40 amp, grounded AC outlets, that is equal to 5 percent of the total number of parking spaces. The conduit shall terminate within the parking area. When the application of the 5 percent results in a fractional space, round up to the next whole number.

#### **99.04.204. ENERGY REDUCTION.**

**99.04.204.1. Prescriptive Approach.** Equipment and fixtures shall comply with the following where applicable:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of .90 or higher.
2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSFP) of 8.0 or higher.
3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.
4. Installed tank type water heaters shall have an Energy Factor (EF) higher than .6.
5. Installed tankless water heaters shall have an Energy Factor (EF) higher than .80.
6. Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
8. Installed swimming pool circulating pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

#### **99.04.211. RENEWABLE ENERGY.**

**99.04.211.4. Future Access for Electrical Solar System.** An electrical conduit shall be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately



sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

*Exception:* Buildings designed and constructed with a solar photovoltaic system or an alternate system with means of generating electricity at time of final inspection.

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

*Exceptions:*

1. For roofs with an area of less than 1000 square feet, the unobstructed space may be reduced to 25 percent of the roof area;
2. Buildings designed and constructed with a solar photovoltaic system or an alternate system with renewable means of generating electricity at the time of final inspection;
3. Where it is not feasible to provide one contiguous area due to the roof configuration, two unobstructed roof areas with a minimum combined area of 250 square feet may be provided;
4. Buildings designed with a green roof making it unfeasible to provide this area.

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

1. Each plumbing fixture and fitting shall meet reduced flow rates specified in Table 4.303.2; or
2. A calculation demonstrating a 20 percent reduction in the building “water use” baseline as established in Table 4.303.1 shall be provided. For low-rise residential occupancies, the calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets and showerheads.

**99.04.303.2. Multiple Showerheads Serving One Shower.** When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads shall not exceed the maximum flow rates specified in the 20 percent reduction column contained in

Table 4.303.2 or the shower shall be designed to only allow one showerhead to be in operation at a time.

*Exception:* The maximum flow rate for showerheads when using the calculation method specified in Section 99.04.303.1, Item 2, is 2.5 gpm @ 80 psi.

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

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor which connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input.

*Note:* More information regarding irrigation controller function and specifications is available from the Irrigation Association.

**99.04.304.1.1. Irrigation Design.** Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers which meet the criteria in Section 99.04.304.1.

**99.04.406. ENHANCED DURABILITY AND REDUCED MAINTENANCE.**

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

*Exception:* Annular spaces around pipes, electric cables, conduits, or other openings in plates at exterior walls shall be protected against the passage of rodents by closing such openings with cement mortar, concrete masonry or similar method acceptable to the Department.

**99.04.407. WATER RESISTANCE AND MOISTURE MANAGEMENT.**

**99.04.407.3. Flashing Details.** Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions at the following locations:

1. Around windows and doors;
2. Roof valleys;

3. Chimneys to roof intersections.

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

**99.04.408. CONSTRUCTION WASTE REDUCTION, DISPOSAL AND RECYCLING.**

**99.04.408.1. Construction Waste Reduction of at Least 50 Percent.** Comply with Section 66.32 et seq. of the Los Angeles Municipal Code.

**99.04.410.1. Operation and Maintenance Manual.** At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the Department which includes all of the following shall be placed in the building:

1. Directions to the owner or occupant that the manual shall remain with the building.
2. Operation and maintenance instructions for the following:
  - a. Equipment and appliances, including water-saving devices and systems, HVAC systems, water-heating systems and other major appliances and equipment.
  - b. Roof and yard drainage, including gutters and downspouts.
  - c. Space conditioning systems including condenser and air filters.
  - d. Landscape irrigation systems.
  - e. Water reuse systems.
3. Information from local utility, water and waste recovery providers on methods to further reduce resource consumption including recycle programs and locations.
4. Public transportation and/or carpool options available in the area.
5. Educational material on the positive impacts of an interior relative humidity between 30-60 percent and what methods an occupant may use to maintain the relative humidity level in that range.
6. Information about water-conserving landscape and irrigation design and controllers which conserve water.
7. Instructions for maintaining gutters and downspouts and importance of diverting water at least 5 feet away from foundation.

8. Information on required routine maintenance measures, including, but not limited to, caulking, painting, grading around building, etc.
9. Information about state solar energy and incentive programs available.
10. A copy of all special inspection verifications required by the Department or this code.

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

**99.04.505. INTERIOR MOISTURE CONTROL.**

**99.04.505.1. General.** Buildings shall meet or exceed the provisions of the Los Angeles Building Standards Code.

**99.40.505.2. Concrete Slab Foundations.** Concrete slab foundations required to have a vapor retarder by Los Angeles Building Code, Chapter 19, shall also comply with this section.

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

1. A 4-inch (101.6 mm) thick base of  $\frac{1}{2}$  inch (12.7 mm) or larger clean aggregate shall be provided with a vapor barrier in direct contact with concrete and a concrete mix design, which will address bleeding, shrinkage, and curling, shall be used. For additional information, see American Concrete Institute, ACI 302.2R-06;
2. Other equivalent methods approved by the Department; or
3. A slab design specified by a licensed design professional.

**99.04.505.3. Moisture Content of Building Materials.** Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed until it is inspected and found to be satisfactory by the building inspector.

Insulation products which are visibly wet or have high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities. Wet-applied insulation products shall follow the manufacturers' drying recommendations prior to enclosure.

## Project Impacts

The Project consists of the development of 142 condominium dwelling units and the residential structures would not exceed six stories. As such, the Project would be defined as “low-rise residential” pursuant to the LA Green Building Code. Specifically, the LA Green Building Code states a low-rise building is a building that is of Occupancy Group R and is six stories or less, or that is a one- or two- family dwelling or townhouse. Thus, the Project would be subject to the mandatory LA Green Building Code measures for newly constructed low-rise residential buildings. These mandatory measures have been outlined above under “Compliance Measures”. The following discussion discloses the potential increase in GHGs associated with Project implementation compared to the existing environmental setting. For purposes of illustrating the effectiveness of the mandatory compliance measures of the LA Green Building Code, calculations for two potential Project scenarios have been included. GHG emissions under a scenario without implementation of code compliance measures have been calculated and compared to a scenario with the Project’s code compliance.<sup>13</sup> In addition, please also refer to the ‘Mitigation Measures’ subheading later in this Section for the definition and applicability of Project mitigation as it pertains to GHG emissions.

### Construction

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. As explained by CAPCOA in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* §15145). Therefore, the construction analysis does not consider such GHG emissions. All GHG emissions are reported on an annual basis.

Emissions of GHGs were calculated using CalEEMod Version 2011.1.1 for each year of construction of the Proposed Project and the results of this analysis are presented in Table IV.E-5. As shown in Table IV.E-5, the greatest annual increase in GHG emissions from Project construction activities would be 869.47 metric tons in 2013.

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<sup>13</sup> The Project’s GHG reductions calculated in Table IV.E-6, Proposed Project Operational Greenhouse Gas Emissions, are based on the following: 5% more energy efficient than Title 24; 20% reduction of indoor water use; ENERGY STAR appliances in all residences; and a 10% reduction in solid waste due to recycling.

**Table IV.E-5**  
**Project Construction-Related Greenhouse Gas Emissions**

<b>Year</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)<sup>a</sup></b>
2013	869.47
2014	574.53
2015	251.27
<b>Total Construction GHG Emissions</b>	<b>1,695.27</b>
<sup>a</sup> Construction CO <sub>2</sub> values were derived using CalEEMod Version 2011.1.1 Source: Parker Environmental Consultants, September 2012. Calculation data and results are provided in Appendix IV.E.	

### **Operation**

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, hearth combustion (from natural gas fireplaces), and generation of solid waste and wastewater, were calculated for a scenario without GHG reduction measures and a scenario with GHG reduction measures. Emissions of GHGs are shown in Table IV.E-6. As shown, the net increase in GHG emissions generated by the Project without GHG reduction measures would be 1,464.26 CO<sub>2</sub>e MTY, and the GHG emissions generated by the Proposed Project with GHG reduction measures would be 1,413.95 CO<sub>2</sub>e MTY. As illustrated in Table IV.E-6, implementation of the Project's GHG reduction measures would reduce Project GHG emissions by approximately 50.31 CO<sub>2</sub>e MTY (or approximately 2.3 percent). Please refer to the 'Cumulative Impacts' subheading for a discussion regarding the Project's net increase of GHGs in a cumulative impact context.

**Table IV.E-6  
Project Operational Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>		
	<b>Project Without GHG Reduction Measures</b>	<b>GHG Reductions from Proposed Measures</b>	<b>Project With GHG Reduction Measures</b>
Natural Gas Consumption	199.73	(8.69)	191.04
Hearth	103.65	(11.02)	92.63
Landscaping Equipment	3.61	0.00	3.61
Electricity Generation	328.47	(12.40)	316.07
Solid Waste Generation	29.72	(2.98)	26.74
Water Consumption	112.62	(15.22)	97.40
Motor Vehicles	1,361.17	0.00	1,361.17
Construction Emissions <sup>a</sup>	56.51	0.00	56.51
<b>Total Project GHG Emissions</b>	<b>2,195.48</b>	<b>(50.31)</b>	<b>2,145.17</b>
<b>Less Existing Project site GHG Emissions</b>	<b>(731.22)</b>	<b>--</b>	<b>(731.22)</b>
<b>Total Net Project GHG Emissions</b>	<b>1,464.26</b>	<b>(50.31)</b>	<b>1,413.95</b>
<sup>a</sup> The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Source: Parker Environmental Consultants, September 2012. Calculation data and results provided in Appendix IV.E.			

## CUMULATIVE IMPACTS

As discussed previously in this Section, a project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Project's contributing effect on global warming.

As noted previously under the 'Thresholds of Significance' subheading, there is substantial evidence to support that compliance with the LA Green Building Code is qualitatively consistent with applicable statewide, regional, and local goals and policies in place for the reduction of GHG emissions, including, but not limited to, AB 32 and the corresponding Scoping Plan. As stated on page 27 of the 2008 Scoping Plan, CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020. As

discussed previously, the City adopted the LA Green Plan to provide a citywide municipal plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. According to the LA Green Plan, Los Angeles is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels. In order to further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects (see 'City of Los Angeles Green Building Code' subheading in this section). As it relates to new development, the City adopted the LA Green Building Code (Ordinance No. 181480) which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City of Los Angeles. As listed previously in this section under the "Compliance Measures" subheadings, the Project's GHG reduction measures meet, and in some cases, exceed state and local building codes associated with green building practices. Thus, the City's Green Building Code and the Project's GHG reduction measures are consistent with the Scoping Plan's recommendation for communities to adopt building codes that go beyond the State code. Therefore, the Project's net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant.

## MITIGATION MEASURES

Section 15126.4(c) of CEQA Guidelines Amendments entitled "Mitigation Measures Related to Greenhouse Gas Emissions" provides the following guidance:

(c) Consistent with Section 15126.4, lead agency shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include among others:

- (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision;
- (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F;
- (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions;
- (4) Measures that sequester greenhouse gases;
- (5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis.



Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

As Lead Agency, the City of Los Angeles has established the LA Green Building Code targeting cumulative citywide reduction of GHGs from development projects through the adoption of Ordinance No. 181480. As such, this code requirement meets the definition for mitigation measures related to GHGs as summarized above in CEQA Guidelines Section 15126.4(c) and is listed in this Section under “Compliance Measures” above. No additional mitigation measures are necessary.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The net increase in GHG emissions generated by the Proposed Project without GHG reduction measures would be 1,464.26 CO<sub>2</sub>e MTY, and the GHG emissions generated by the Proposed Project with GHG reduction measures would be 1,413.95 CO<sub>2</sub>e MTY. As previously illustrated in Table IV.E-6, implementation of the Project’s GHG reduction measures would reduce Project GHG emissions by approximately 50.31 CO<sub>2</sub>e MTY. As listed previously in this section under the “Compliance Measures” subheading, the Project’s GHG reduction measures meet, and in some cases, exceed state and local building codes associated with green building practices. Thus, the City’s Green Building Code and the Project’s GHG reduction measures are consistent with the Scoping Plan’s recommendation for communities to adopt building codes that go beyond the State code. Therefore, the Project’s net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### F. HYDROLOGY & WATER QUALITY

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#### ENVIRONMENTAL SETTING

##### Federal Regulations

##### *National Flood Insurance Program*

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the Federal Emergency Management Agency (FEMA) to evaluate flood hazards. FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and floodplain development, identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies (FIS). Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

The Flood Disaster Protection Act requires owners of all structures in identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally related financial assistance, such as mortgage loans from federally insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA. The NFIP is required to offer federally subsidized flood insurance to property owners in those communities that adopt and enforce floodplain management ordinances that meet minimum criteria established by FEMA. The National Flood Insurance Reform Act of 1994 further strengthened the NFIP by providing a grant program for state and community flood mitigation projects. The act also established the Community Rating System, a system for crediting communities that implement measures to protect the natural and beneficial functions of their floodplains, as well as manage erosion hazards. The City of Los Angeles (the “City”) participates in the NFIP.

##### *Clean Water Act*

The United States Environmental Protection Agency (EPA) regulates water quality under the Clean Water Act (also known as the Federal Water Pollution Control Act). Enacted in 1972, and significantly amended in subsequent years, the Clean Water Act is designed to restore and maintain the chemical, physical, and biological integrity of waters in the United States. The Clean Water Act provides the legal framework for several water quality regulations, including National Pollutant Discharge Elimination System (NPDES) Permits, effluent limitations, water quality standards, pretreatment standards, anti-degradation policy, non-point source discharge regulation, and wetlands protection.

The Clean Water Act requires NPDES permits for the discharge of pollutants to waters of the United States. In 1987, the Clean Water Act was amended to require that the EPA establish regulations for permitting of municipal and industrial stormwater discharges under the NPDES permit program. The EPA published final regulations regarding stormwater discharges on November 16, 1990. The

regulations require that municipal separate storm sewer system (MS4) discharges to surface waters be regulated by a NPDES permit.

The EPA has delegated the responsibility for administration of portions of the Clean Water Act to state and regional agencies. The Clean Water Act requires states to adopt water quality standards for receiving water bodies and to have those standards approved by the EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing, etc.), along with water quality criteria necessary to support those uses. Water quality criteria are prescribed concentrations or levels of constituents, such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements that represent the quality of water that support a particular use.

### ***National and State Safe Drinking Water Acts***

The Federal Safe Drinking Water Act, established in 1974, sets drinking water standards throughout the country and is administered by EPA. The drinking water standards established in the Act, as set forth in the Code of Federal Regulations (CFR), are referred to as the National Primary Drinking Water Regulations (Primary Standards, Title 40, CFR, Part 141) and the National Secondary Drinking Water Regulations (Secondary Standards, 40 CFR Part 143). California passed its own Safe Drinking Water Act in 1986 that authorizes the State's Department of Health Services (DHS) to protect the public from contaminants in drinking water by establishing maximum contaminants levels (MCLs), as set forth in the California Code of Regulations (CCR), Title 22, Division 4, Chapter 15, that are at least as stringent as those developed by the EPA, as required by the federal Safe Drinking Water Act.

### ***Federal Antidegradation Policy***

The Federal Antidegradation Policy (Title 40, CFR §131.12) requires states to develop statewide anti-degradation policies and identify methods for implementing them. Pursuant to this policy, state anti-degradation policies and implementation methods shall, at a minimum, protect and maintain: (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource. State permitting actions must be consistent with the Federal Antidegradation Policy.

## **State Regulations**

### ***California Porter-Cologne Act***

The Porter-Cologne Water Quality Control Act (embodied in the California Water Code) established the principal California legal and regulatory framework for water quality control. The California Water Code authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the Federal Clean Water Act including the authority to regulate waste disposal sites and to require cleanup of discharges of hazardous materials and other pollutants. The California Water Code also establishes

reporting requirements for unintended discharges of hazardous substance, sewage, or oil or petroleum products.

Under the California Water Code, the State of California is divided into nine regions governed by regional water quality control boards (RWQCB) that, under the guidance and review of the SWRCB, implement and enforce provisions of the California Water Code and the Clean Water Act. Each RWQCB must formulate and adopt a water quality control plan (Basin Plan) for its region. The Basin Plan must conform to the policies set forth in the California Water Code and established by the SWRCB in its state water policy. The California Water Code also provides RWQCBs the authority to include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

### ***California Toxics Rule***

The EPA has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the Los Angeles Regional Water Quality Control Board (LARWQCB) as having beneficial uses protective of aquatic life or human health. Due to the intermittent nature of stormwater runoff, especially in southern California, the acute criteria are considered to be more relevant to stormwater than are the chronic criteria.

California Toxics Rule criteria for certain metals are expressed as a function of hardness because hardness and/or water quality characteristics that are usually correlated with hardness can reduce or increase the toxicities of some metals. Hardness is used as a surrogate for a number of water quality characteristics that affect the toxicity of metals: increasing hardness has the effect of decreasing the toxicity of metals. At higher hardness values for the receiving water, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column; this in turn reduces the bioavailability and resulting potential toxicity of these metals. Therefore, the California Toxics Rule criteria increase with increasing levels of hardness.

### **Local Regulations**

#### ***The Los Angeles Regional Board Basin Plan***

The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (i) designates beneficial uses for surface and ground waters; (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.

### ***Construction Permits***

Pursuant to the Clean Water Act Section 402(p), requiring regulations for permitting of certain stormwater discharges, the SWRCB has issued a statewide General Permit for Stormwater Discharges Associated with Construction Activity and Land Disturbance Activities (Order No. 2010-0014-DWQ, adopted by the SWRCB on November 16, 2010 and effective February 14, 2011).

Under this Construction General Permit, discharges of stormwater from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing permit registration documents, which include a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other documents required by this General Permit, and mailing the appropriate permit fee to the State Water Board, prior to the commencement of construction activity. SWPPPs incorporate erosion control, sediment removal, and construction waste management control measures during construction, site stabilization measures in the short-term post-construction period, and may identify BMPs for post-construction land use. The SWPPP must do the following:

1. Be developed and implemented by Qualified SWPPP Developers and Practitioners who have taken the appropriate state certified training;
2. Address control of all pollutants and their sources, including sources of sediment, associated with construction activities;
3. Ensure all non-storm water discharges are identified and either eliminated, controlled, or treated;
4. Include a Monitoring and Reporting Plan (M&RP) to be immediately implemented at the start of construction;
5. Include a description of all post-construction BMPs on a site and a maintenance schedule;
6. Be available at the construction site during working hours while construction is occurring and shall be made available upon request by a State or Municipal inspector.

Dischargers must file a Notice of Termination (NOT) with the Regional Water Board when construction is complete and final stabilization has been reached or ownership has been transferred. The discharger must certify that all State and local requirements have been met in accordance with this General Permit. In order for construction to be found complete, the discharger must install post-construction storm water management measures and establish a long-term maintenance plan.

### ***Los Angeles County MS4 Permit***

The State's Municipal Storm Water Permitting Program regulates stormwater discharges from Municipal Separate Storm Sewer Systems (MS4s). Under Phase I of the Program, which started in 1990, the RWQCBs have adopted NPDES stormwater permits for medium (serving between 100,000 and 250,000 people) and large (serving 250,000 people) municipalities. Most of these permits were issued to a group of co-permittees encompassing an entire metropolitan area.

In 2001, the LARWQCB issued an NPDES Permit and Waste Discharge Requirements (Order No. 01-182) under the Clean Water Act and the Porter-Cologne Act for discharges of urban runoff in public storm drains in Los Angeles County. The Permit was most recently amended on April 14, 2011, pursuant to the peremptory writ of mandate in L.A. Superior Court Case No. BS122724, which voided and set aside a 2006 amendment. The Permittees are the Los Angeles County incorporated cities (including the City but excluding the City of Long Beach) and the County (collectively “the Co-permittees”).

An important element incorporated into the NPDES MS4 Permit is the requirements associated with development or redevelopment of a site. The NPDES MS4 Permit requires development/redevelopment projects to incorporate permanent (post-construction) stormwater mitigation measures, if the project is one of the following:

- Parking lots that are greater than 5,000 square feet or 25 or more parking spaces
- More than 10 houses, condos, or apartment units
- Restaurant
- Auto Service Facility
- Retail Gas Outlet
- Commercial area that is more than 1 acre
- Adjacent to Environmentally Sensitive Area (i.e. the river)
- Redevelopment of any of the above disturbing more than 5,000 square feet

These measures are addressed by developers through the preparation of a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site-Specific Mitigation Plan. The primary purpose of these plans is to reduce the quantity and improve the quality of stormwater runoff that leaves a site.

To implement the requirements of the NPDES permit, the Co-permittees have created development planning guidance and control measures that control and mitigate stormwater quality and quantity impacts to receiving waters as a result of new development and redevelopment. The Co-permittees are also required to implement other municipal source detection and elimination programs, as well as maintenance measures.

### ***Stormwater Quality Management Program***

The Los Angeles County MS4 Permit requires the Co-permittees to implement a Stormwater Quality Management Program (SQMP). The SQMP summarizes the program components the Co-permittees will implement to comply with the MS4 Permit. The Los Angeles County MS4 Permit contains the following provisions for implementation of the SQMP by the Co-permittees:

- General Requirements – Each Permittee is required to implement the SQMP to comply with applicable storm water program requirements and implement additional controls where necessary to reduce the discharge of pollutants in stormwater to the maximum extent practicable.

- BMP Implementation – Permittees are required to implement the most effective combination of BMPs for stormwater/urban runoff pollution control.
- SQMP Revision – Permittees are required to revise the SQMP to comply with regional, watershed specific requirements, and/or waste load allocations for implementation of TMDLs for impaired waterbodies.
- Responsibilities of the Principal Permittee – The responsibilities of the Los Angeles County Department of Public Works (as the Principal Permittee) include, but are not limited to, coordinating activities necessary to comply with the NPDES permit, providing personnel and fiscal resources to prepare SQMP updates and annual reports and summaries of reports required under the SQMP, and implementing a County-wide Monitoring Program and evaluating results of the monitoring program.
- Responsibilities of Co-permittees – Each Co-permittee is required to comply with the requirements of the SQMP applicable to the discharges within its boundaries.
- Watershed Management Committees (WMCs) – WMCs are comprised of a voting representative from each Permittee within the Watershed Management Areas (WMAs). WMCs are required to facilitate efforts and exchange of information between Co-permittees, establish additional goals for WMAs, prioritize pollution control efforts, monitor implementation of tasks designated for the WMA, and assess the effectiveness of and recommend revisions to the SQMP.
- Legal Authority – Co-permittees are granted the necessary legal authority to prohibit non-storm water discharges to the storm drain system.

The objective of the SQMP is to reduce pollutants in urban stormwater discharges to the maximum extent practicable in order to attain water quality objectives and to protect the beneficial uses of receiving waters in Los Angeles County. Special provisions are provided in the Los Angeles County MS4 Permit to facilitate implementation of the SQMP. These provisions include the following:

- BMP substitution;
- Public Information and Participation Program (PIPP);
- Industrial/Commercial Facilities Control Program;
- Development Planning Program;
- Development Construction Program;
- Public Agency Activities Program; and
- Illicit Connections and Illicit Discharges Elimination Program.

### ***Standard Urban Stormwater Mitigation Plan***

On March 8, 2000, the development planning program requirements, including the SUSMP requirements (collectively, development planning program requirements, including SUSMP requirements, are referred to in this EIR as SUSMP requirements) were approved by the LARWQCB as part of the MS4 program to address stormwater pollution from new construction and redevelopment. The SUSMP contains a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. The SUSMP defines, based upon land use type, the types of practices that must be included and issues that must be addressed as appropriate to the development type and size.

Finalized in September 2002, the County of Los Angeles' Manual for the Standard Urban Stormwater Mitigation Plan details the requirements for new development and significant redevelopment BMPs (Los Angeles County, 2002) (the "Manual"). The Manual is a model guidance document for use by the Co-permittees and certain individual project owners to select post-construction BMPs and otherwise comply with the SUSMP requirements. The Manual addresses water quality and drainage issues by specifying design standards for structural or treatment control BMPs that infiltrate or treat stormwater runoff and control peak flow discharge. BMPs are defined in the Manual and SUSMP requirements as "any program, technology, process, sizing criteria, operational methods or measures, or engineered systems, which, when implemented, prevent, control, remove, or reduce pollution." Treatment BMP design criteria and guidance are also contained in the Los Angeles County MS4 Permit, the Manual, and in the Technical Manual for Stormwater Best Management Practices in the County of Los Angeles, issued by the Los Angeles County Department of Public Works in February 2004.

### ***General Dewatering Permit***

The LARWQCB has issued a General NPDES Permit and General Waste Discharge Requirements (WDRs) (Order No. R4-2003-0111, NPDES No. CAG994004) governing construction-related dewatering discharges (the "General Dewatering Permit"). This permit addresses discharges from temporary dewatering operations associated with construction and permanent dewatering operations associated with development. The discharge requirements include provisions mandating notification, sampling and analysis, and reporting of dewatering and testing-related discharges. The General Dewatering Permit authorizes such construction-related activities so long as all conditions of the permit are fulfilled.

### ***Los Angeles Stormwater Ordinance (LAMC 64.70)***

On October 1, 1998 the Stormwater and Urban Runoff Pollution Control Ordinance became law in the City. The ordinance not only makes it a crime to discharge pollutants into the storm drain system and imposes stiff fines on violators, but also gives City public officers the authority to issue citations or arrest business owners or residents who deliberately and knowingly dump or discharge hazardous chemicals or debris into the system.



***Proposition O***

On November 2, 2004, the voters of Los Angeles passed Proposition O, which authorized the City to issue a series of general obligation bonds for up to \$500 million for projects to protect public health by cleaning up pollution, including bacteria and trash, in the City's watercourses, beaches, and the ocean, in order to meet Federal Clean Water Act requirements. In addition, the measure funds improvements to protect water quality, provide flood protection, and increase water conservation, habitat protection, and open space. The bonds allow the City to purchase property and/or improve municipal properties to achieve the following:

- Protect rivers, lakes, beaches, and the ocean
- Conserve and protect drinking water and other water sources
- Reduce flooding and use neighborhood parks to decrease polluted runoff
- Capture, clean up, and reuse stormwater

***Water Quality Compliance Master Plan for Urban Runoff (WQCMPUR)***

On March 2, 2007, the City's Energy and the Environment/AdHoc River Committee filed a Motion directing the Bureau of Sanitation to create a Water Quality Compliance Master Plan for Urban Runoff (WQCMPUR). In May 2009, the final plan, a 20-year strategy for clean stormwater and urban runoff to protect the City's rivers, lakes and beaches from pollution, was adopted by the Board of Public Works. By promoting a green infrastructure, the WQCMPUR seeks a broad watershed-based perspective using green and natural solutions to improve water quality and bring Los Angeles into compliance with current and emerging water quality regulations.

***Stormwater Low Impact Development (LID) Ordinance***

Adopted by the City on November 14, 2011, the Stormwater LID Ordinance requires stormwater mitigation for a much larger number of development and redevelopment projects than was previously required under SUSMP. Prior to the implementation of the LID Ordinance, the City's SUSMP program required only specific development and redevelopment categories to incorporate stormwater BMPs. The Stormwater LID Ordinance has expanded these categories to include all development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area. The Stormwater LID Ordinance applies to all development and redevelopment in the City that requires building permits within the City after the ordinance effective date except for the following:

- A development or redevelopment that only creates, adds, or replaces less than 500 square feet of impervious area
- A development or redevelopment involving only emergency construction activity required to immediately protect public health and safety;
- Infrastructure projects within the public right-of-way

- A development or redevelopment involving only activity related to gas, water, cable, or electricity services on private property
- A development or redevelopment involving only re-striping of permitted parking lots
- A project involving only exterior movie and television production sets, or facades on existing developed site

### **Project Site**

The Project site is almost entirely covered with impermeable surfaces (e.g. structures, concrete, and asphalt). The elevation of the Project site is approximately 216 feet above mean sea level (msl). The topography of the Project site and surrounding area is generally flat with a downgradient slope towards the south. Currently, stormwater runoff from the Project site generally flows into the storm drains east of the Project site along Oak Street.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

#### ***CEQA Guidelines***

In accordance with Appendix G to the *CEQA Guidelines*, a project could result in a significant impact if the project would result in one or more of the following:

- a) Violate any water quality standards or waste discharge requirements;
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site;
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- f) Otherwise substantially degrade water quality;

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

### ***L.A. CEQA Thresholds Guide***

The *L.A. CEQA Thresholds Guide* requires the hydrology analysis to address the following two areas of study: (1) surface water hydrology, and (2) groundwater level.

#### ***1. Surface Water Hydrology***

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on surface water hydrology if the project would:

- a) 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;
- b) Substantially reduce or increase the amount of surface water in a water body; or
- c) 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.

#### ***2. Groundwater Level***

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on groundwater level if the project would:

- a) Change potable water level sufficiently to:
  - o 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;
  - o Reduce yields of adjacent wells or well fields (public or private); or
  - o Adversely change the rate or direction of flow of groundwater.

or

- b) Result in demonstrable and sustained reductions of groundwater recharge capacity.

### ***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any significant impacts related to issues “a” (waste discharge requirements), “b,” “c,” “d,” “e,” “g,” “h,” “i,” or “j” listed under the *CEQA Guidelines*. No further analysis of these issues is required. Project impacts related to issues “a” (water quality) and “f” are discussed in more detail below.

Regarding “Surface Water Hydrology” listed under the *L.A. CEQA Thresholds Guide*, the factors listed for this study area are all related to changes in the volume and flow of runoff from the site and are similar to issues “c,” “d,” and “e” listed under *CEQA Guidelines*. For reasons already discussed, no further analysis of these issues is required.

Regarding “Groundwater Level” listed under the *L.A. CEQA Thresholds Guide*, the factors listed for this study area are all related to changes in groundwater and are similar to issue “b” listed under the *CEQA Guidelines*. For reasons already discussed, no further discussion of this issue is required.

## **Project Impacts**

### ***Water Quality***

#### **Construction**

During construction, sediment is typically the constituent of greatest potential concern. The greatest risk of soil erosion during the construction phase occurs when site disturbance peaks due to grading activity and removal and re-compaction or replacement of fill areas. Sediment is not typically a constituent of concern during the long-term operation of developments similar to the proposed Project because sites are usually paved, and proper drainage infrastructure is installed. Other pollutants that could affect surface-water quality during the Project construction phase include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides).

The Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization

measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant.

### Operation

Once the Project has been constructed, urban runoff might include all of the above contaminants. Trace metals from pavement runoff and landscape maintenance debris may be mobilized in wet-season storm runoff from driveway areas and landscaping, and in dry-season "nuisance flows" from landscape irrigation. Liquid product spills occurring at the Project site could also enter the storm drain. Dry product spills could enter the storm drain via runoff in wet weather conditions or dry-season "nuisance flows."

In accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. More specifically, the Project Applicant shall prepare a LID Plan shall to comply with the following:

1. Stormwater runoff will be infiltrated, evapotranspired, captured and used, and/or treated through high removal efficiency Best Management Practices onsite, through stormwater management techniques as identified in Section 4.1. The onsite stormwater management techniques must be properly sized, at a minimum, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible, for at least the volume of water produced by the water quality design storm event that results from:
  - i. The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area using a 48 to 72-hour drawdown time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); or
  - ii. The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the California Stormwater Best Management Practices Handbook – Industrial/Commercial, (2003); or
  - iii. The volume of runoff produced from a 0.75-inch storm event.

2. Pollutants shall be prevented from leaving the development site for a water quality design storm event as defined above unless it has been treated through an onsite high removal efficiency biofiltration/biotreatment system.
3. Hydromodification impacts shall be minimized to natural drainage systems.

Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet the City's water quality standards. Therefore, Project impacts related to operational water quality would be less than significant.

## **CUMULATIVE IMPACTS**

The Project area is almost entirely developed with impervious surfaces, and the quality of runoff from the area is affected by existing land uses and BMPs. Future development projects within the Project area are likely to be subject to more stringent BMPs (since BMPs are regularly updated) than what are in use under the existing conditions. As such, it is possible that future development would improve the quality of water draining from the area. Additionally, similar to the Project, each of the applicants of the related projects would be required to comply with SWPPP and/or LID Plan requirements and undergo a preliminary review by the City to determine what drainage improvements and BMPs would be required to ensure no significant water quality issues. As discussed above, the proposed Project would not result in any significant hydrology and water quality impacts. Therefore, cumulative impacts to hydrology and water quality would be less than significant.

## **MITIGATION MEASURES**

No significant impacts related to hydrology and water quality have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- F-1: Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- F-2: Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, veF-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- F-3: Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

- F-4: All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.
- F-5: Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- F-6: Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- F-7: Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.
- F-8: The Project Applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook, Part B, Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.
- F-9: Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate.
- F-10: The amount of impervious surface shall be reduced to the extent feasible by using permeable pavement materials where appropriate, including: pervious concrete/asphalt, unit pavers (i.e., turf block), and granular materials (i.e. crushed aggregates, cobbles, etc.).
- F-11: A roof runoff system shall be installed, as feasible, where site is suitable for installation.
- F-12: All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- F-13: Legibility of stencils and signs shall be maintained.
- F-14: Materials with the potential to contaminate stormwater shall be placed in an enclosure, such as a cabinet or shed or similar structure that prevents contact with or spillage to the stormwater conveyance system.
- F-15: Storage areas shall be paved and sufficiently impervious to contain leaks and spills.
- F-16: An efficient irrigation system shall be designed and implemented by a certified landscape contractor to minimize runoff including: drip irrigation for shrubs to limit excessive spray; a SWAT-tested weather-based irrigation controller with rain shutoff; matched precipitation (flow)

rates for sprinkler heads; rotating sprinkler nozzles; minimum irrigation system distribution uniformity of 75 percent; and flow reducers.

F-17: The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.

F-18: Toxic wastes shall be discarded at a licensed regulated disposal site.

F-19: Wastes including paper, glass, aluminum, oil, and grease shall be recycled to the extent feasible.

F-20: The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to hydrology and water quality would be less than significant.



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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### G. LAND USE PLANNING

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#### ENVIRONMENTAL SETTING

##### Existing Onsite Uses

The Project site is currently used as a commercial catering facility and occupied by a one-story, brick building of approximately 12,335 square feet (built in 1978) that fronts onto Washington Boulevard, and a paved surface parking lot that extends south behind the building to the end of the property at 20<sup>th</sup> Street (refer to Figures II-1 and II-2 in Section II [Environmental Setting]).

##### Surrounding Land Uses

The Project site is located along a heavily trafficked segment of Washington Boulevard southeast of Interstate 10 (the “I-10 Freeway”) and west of Interstate 110 (the “I-110 Freeway”). The land uses within the general vicinity of the Project site are characterized by a mix of low- to mid-intensity commercial and retail uses, which vary widely in building style and period of construction.

The area immediately surrounding the Project site is developed with a mix of single- and multi-family residential, commercial, and institutional buildings with associated surface parking lots, of varying architectural style and dates of construction. Dominating the area is the Santa Monica Freeway which, in the Project vicinity, consists of four parallel bridges that cross Washington Boulevard diagonally just to the west of the Project site. The area under the freeway on-ramp is used for truck storage and a self-serve storage facility. The north side of Washington Boulevard, to the east of the bridges, supports a mix of commercial and light industrial uses including a one-story building that houses blue printing/graphics businesses, an unoccupied church and the historic Casa Camino Real Building, a partially vacant 5-story mixed-use building. Other uses on Washington Boulevard include a mix of low- to mid-height retail and commercial buildings.

To the east of the Project site, across Oak Street at its intersection with Washington Boulevard, is Giroux Glass, an industrial glass manufacturing and installation plant. Farther to the east beyond Giroux Glass is a Groman Mortuary. South of Giroux Glass and directly across Oak Street from the Project site are two schools, a USC Continuing Education facility and Norwood Street Elementary School.

To the west of the Project site is an adjacent two-story commercial building and a parking lot that serves as a loading and staging area for this building. To the west of this two-story commercial building at the corner of Toberman Street and Washington Boulevard, is the Downtown Value School, an alternative day school.

The south side of 20<sup>th</sup> Street between Oak Street on the east and Toberman Street on the west is lined with a surface parking lot that serves Norwood Street School and a row of large single-family Craftsman homes. To the west of Toberman Street, 20<sup>th</sup> Street is characterized by a mix of one- and two-story single

and multifamily residences. Toberman Street, south of Washington Boulevard and the Downtown Value School, is a narrow residential street consisting of a mix of one and two-story, single and multi-family residences. South and east of the Project site along 21<sup>st</sup> Street and Norwood Street are more single and multifamily residences.

### **Regulatory Framework**

At the regional level, development of the Project site is guided by various plans of the Southern California Association of Governments (SCAG) including: the Southern California Compass Growth Vision Report (the “Compass Growth Vision”); the 2008 Regional Comprehensive Plan (the “2008 RCP”); and the Regional Transportation Plan (the “RTP”). Other regional plans that apply to the Project site include the South Coast Air Quality Management District’s (SCAQMD) Air Quality Management Plan (AQMP) and the Congestion Management Plan (CMP) for Los Angeles County.

At the local level, development of the Project site is guided by the City of Los Angeles General Plan (the “General Plan”); the South Los Angeles Community Plan; the City of Los Angeles Municipal Code (the “LAMC”); the Walkability Checklist; the 2010 Bicycle Plan; Citywide Design Guidelines; and the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay District (NSO) (Ordinance 180218). An overview of each of these plans is provided below.

### ***Regional Plans***

#### ***Southern California Association of Governments (SCAG)***

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

#### ***The Compass Growth Vision***

The *Compass Growth Vision* was published by SCAG in June 2004 and presents a comprehensive growth vision for the six-county SCAG region, as well as the achievements of the process for developing the growth vision. The report details the evolution of the draft vision from the study of emerging growth trends and systematic modeling of the effects of alternative growth pattern scenarios on transportation systems, land consumption, and other factors.

The *Compass Growth Vision* notes that population and household growth trends and existing housing conditions point to an unmet demand for a greater diversity of housing throughout the six-county region. For example, while existing multi-family units account for a significant proportion of the overall supply, at about 40 percent, multi-family buildings are being added to the total housing stock at a much lower

proportion. As a result, the demand for such housing (e.g., from immigrant populations, young adults, and seniors) is outpacing multi-family production.

In its discussion about land supply, the *Compass Growth Vision* notes that the region faces a severe limit on the amount of undeveloped land suitable for development, which hinders its ability to accommodate new housing and jobs. It finds that under current general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land.

Further, with limited undeveloped land, already developed land will become increasingly important in accommodating growth. Infill, or new development in already developed areas, will be the method used to construct nearly half of the new housing region wide. In the City, infill development could accommodate up to 80 percent of the projection for this area. The *Compass Growth Vision* concluded that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure proved to be of enormous benefit in accommodating future growth.

Four principles were established for the *Compass Growth Vision* that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below. In addition, SCAG is in the process of implementing an associated *Compass Growth Vision* "2% Strategy," which embodies the idea that small, incremental, and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to the individual cities.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2) locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.
- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

#### 2008 Regional Comprehensive Plan (RCP)

SCAG has also prepared and issued the *2008 RCP* in response to SCAG’s Regional Council directive in the *2002 Strategic Plan* to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.<sup>1</sup> The *2008 RCP* is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The *2008 RCP* may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the *Compass Growth Vision* and includes nine chapters addressing land use and housing, open space and habitat, water, energy, air quality, solid waste, transportation, security and emergency preparedness, and economy. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The *2008 RCP* replaced SCAG’s 1996 *Regional Comprehensive Plan and Guide (RCPG)* for use in SCAG’s Intergovernmental Review (IGR) process. SCAG’s Community, Economic and Human Development Committee and the Regional Council took action to accept the *2008 RCP*, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the *2008 RCP* is not used in SCAG’s IGR process. Rather, SCAG reviews new projects based on consistency with the *2008 RTP* and *Compass Growth Vision*.

#### Southern California Regional Transportation Plan (RTP)

The latest update of SCAG’s federally-mandated *RTP*, titled *Destination 2030*, provides a comprehensive and multi-modal regional transportation plan that meets applicable federal and state requirements and reflects a vision for the region that balances land use with transportation investments in a way that is complementary to existing investments. In addition, the *RTP* addresses the goals and objectives established by SCAG, based on application of a number of key performance measures. The *RTP* reflects the growing realization that the region must do a better job of integrating transportation and land use planning in ways that reflect public desires for maintaining the high quality of life that southern Californians expect and deserve.

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<sup>1</sup> SCAG, *2008 Regional Comprehensive Plan*, <http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP>

The goals of the *RTP* are to maximize mobility and accessibility for all people and goods in the region; ensure travel safety and reliability for all people and goods in the region; preserve and ensure a sustainable regional transportation system; maximize the productivity of the transportation system; protect the environment, improve air quality and promote energy efficiency; and encourage land use and growth patterns that complement the region's transportation investments.

#### *Air Quality Management Plan (AQMP)*

The Project site is also located within the South Coast Air Basin (the "Basin") and therefore, is within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the *AQMP*, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and vehicle miles traveled (VMT). Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the National Ambient Air Quality Standards (NAAQS).

The current *AQMP* establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the *AQMP* incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

#### *2010 Congestion Management Program for Los Angeles County (CMP)*

The *CMP* was developed in accordance with Section 65089 of the California Government Code, which requires that a congestion management program be developed, adopted and updated biennially for every county that includes an urbanized area and include every city and the county government within that county. On October 28, 2010 the Metro Board adopted the current *CMP* for Los Angeles County. The 2010 *CMP* summarizes the results of 18 years of *CMP* highway and transit monitoring and 15 years of monitoring local growth. Statutory elements of the *CMP* include Highway and Roadway System monitoring, multi-modal system performance analysis, the Transportation Demand Management Program, the Land Use Analysis Program and local conformance for all the county's jurisdictions.

The *CMP* is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the *CMP* seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects that are eligible to compete for State gas tax funds. To receive funds from Proposition 111 (i.e., State gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the *CMP*. Within the County, the Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the County's adopted *CMP*.

The Project's traffic impact analysis, which is presented in greater detail in Section IV.K (Transportation/Traffic) of this EIR, was prepared in accordance with the *CMP* as well as the City's Department of Transportation (LADOT) guidelines.

### ***Local Plans and Regulations***

#### *City of Los Angeles General Plan*

State law requires that every city and county prepare and adopt a long-range comprehensive general plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan (the "*General Plan*") addresses community development goals and policies relative to the distribution of public and private land use. The *General Plan* includes the following elements: Framework, Air Quality, Conservation, Housing, Noise, Open Space Plan, Service Systems Element and Public Recreation Plan, Safety, and Transportation. An overview of the elements of the *General Plan* is included below.

#### General Plan Framework Element

The Citywide General Plan Framework Element (the "General Plan Framework"), adopted in December 1996 and readopted in August 2001, establishes the conceptual relationship between land use and transportation on a citywide basis and defines new land use categories that better describe the character and function of the city as it has evolved over time. The new categories - Neighborhood District, Community Center, Regional Center, Downtown Center and Mixed Use Boulevards - are broadly defined and identified as generalized locations shown on a series of long-range land use diagrams included in the General Plan Framework. There is no land use category identified for the Project site on these diagrams, and because it is only a citywide guide, and the General Plan Framework cannot anticipate every detail, the community plans must be looked to for final determinations as to boundaries, land use categories, intensities and heights that fall within the ranges described by the Framework.

#### Air Quality Element

The Air Quality Element of the *General Plan* was adopted on November 24, 1992 and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality

improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county, and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of state and federal air quality standards. The Air Quality Element highlights the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. Mutually reinforcing strategies need to be developed which work to reduce the use of single occupant vehicles, vehicle trips, and vehicle miles traveled (VMT).

The Air Quality Element establishes the following six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

#### Conservation Element

The Conservation Element surveys laws, requirements, and procedures that have been established for protection of natural resources. It primarily is an informational document that is designed to help readers understand the context, history, and opportunities for protection and improvement of the City's natural resources.

#### Housing Element

The 2006-2014 Housing Element of the *General Plan* is the City's blueprint for meeting the housing and growth challenge. It identifies the City's housing conditions and needs, reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City has committed to implement to create sustainable, mixed-income neighborhoods across the City.



### Noise Element

The Noise Element applies to the city as a whole and addresses noise mitigation regulations, strategies, and programs, and delineates federal, state, and city jurisdiction relative to rail, automotive, aircraft, and nuisance noise. Regulation of noise relative to vehicles is largely outside the authority of municipal government. Primary municipal authority relates to regulation of land use, implementing federal and state regulations, and enforcing nuisance noise. The Noise Element describes noise management programs of each jurisdictional entity, as programs related to noise generation in the City.

### Open Space Plan

The Open Space Plan is an element of the *General Plan*. Its purpose is to provide an official guide to the City Planning Commission, the City Council, the Mayor, other governmental agencies, and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City. The Open Space Plan includes definitions, objectives, policies, standards and criteria, programs, and a map that are to be used when decisions are made pertaining to open space within the City.

### Public Recreation Plan

The Public Recreation Plan consists of text and a map that shows the general location of recreational sites on a citywide basis. More specific locations are shown on the adopted Community Plan maps. The Public Recreation Plan sets forth recreation standards intended to provide a basis for satisfying the needs for neighborhood and community recreational sites. The standards are not intended to set an upper limit for the areas of parks, recreational sites, or other types of open space.

### Safety Element

The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. An important premise of the Safety Element is that Los Angeles is a built city that is integrally connected to its neighbors geographically and by natural disasters that recognize no boundaries. Therefore, the Safety Element outlines the historic evolution in Los Angeles of local, state, and federal roles, particularly relative to mitigation of and response to natural disasters. The Safety Element contains goals, objectives, policies, and broadly stated programs, which are outlined programs of the City Emergency Operations Organization (EOO). The EOO is the City agency (program) that implements the Safety Element.

### Transportation Element

The Transportation Element of the *General Plan* sets forth goals, objectives, and policies that establish a citywide strategy to achieve long-term mobility and accessibility within the City. The *General Plan* states that not all of the policies set forth in the Transportation Element can be achieved in any given action or in relation to any specific decision on a project. City decision-makers are to decide how to best implement the adopted policies of this element so as to best serve the health, safety, mobility, and general welfare of the public on a case-by-case basis.

### South Los Angeles Community Plan

The Project site is located within the *South Los Angeles Community Plan* area, which is located approximately 3 miles southwest of Downtown Los Angeles and contains approximately 9,881 acres or approximately 15.8 square miles of land area. The plan area is bounded on the north by Pico Boulevard, on the east by Figueroa Street and Broadway, 120<sup>th</sup> Street and the County of Los Angeles form the southern boundary, and Van Ness/Arlington Avenues form the boundary of the Community on the west.

The *South Los Angeles Community Plan* is organized into five chapters. The applicable chapters addressed in this land use analysis are: Chapter III, Land Use Policies and Programs, which identifies goals, policies, and programs with respect to the land use types within the plan area; and Chapter V, Urban Design, which provides project-specific design standards for various land uses (i.e., commercial, residential, industrial), as well as general community design/landscaping guidelines related to entryway improvements, streetscape, street trees, street furniture, street lighting, sidewalks/paving, signage, and public open space/plazas.

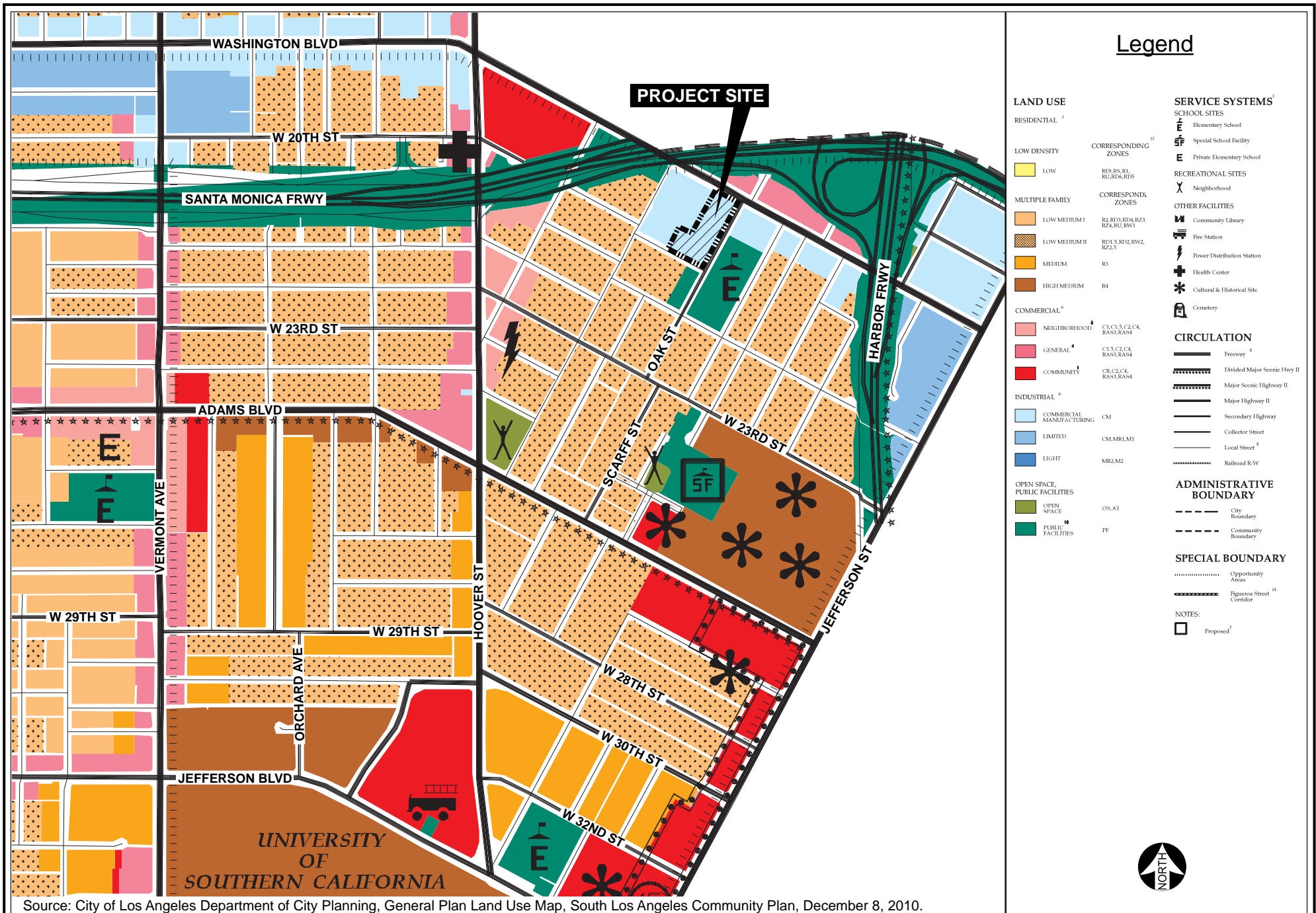
The Project site is designated as Industrial “Commercial Manufacturing” in the *South Los Angeles Community Plan* (refer to Figure IV.G-1). This citywide zoning designation allows for wholesale storage, clinics, limited manufacturing, limited C2 (Commercial) uses and R3 (Residential) uses, although Policy 2-1.2 specifically discourages residential only development in commercially planned/zoned areas. To implement this policy, the *South Los Angeles Community Plan* requires a decision-maker to make a finding that any proposed residential only development in a commercial area is compatible in scale, character and design with adjacent commercial development.

The expressed goals and objectives for residential, commercial, and industrial land uses in the community plan area are as follows:

Goal 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.

Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of existing residents and projected population of the Plan area.

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Objective 1-2: To locate new housing in a manner that reduces vehicular trips and makes it accessible to services and facilities.

Objective 1-3: To preserve and enhance the varied and distinct residential character integrity of existing single- and multi-family neighborhoods.

Objective 1-4: To preserve and enhance neighborhoods with distinctive and significant historical character.

Objective 1-5: To promote and ensure the provision of adequate housing for all persons regardless of income, age, or ethnic background.

Objective 1-6: To limit the intensity and density of development according to the underlying geology and capacity of the infrastructure.

Goal 2: A strong and competitive commercial sector that best serves the needs of the community through maximum efficiency and accessibility while preserving the historic commercial and cultural character of the district.

Objective 2-1: To conserve and strengthen viable commercial development.

Objective 2-2: Allow for the development of automobile-related uses in appropriate commercial designations along major arterials.

Objective 2-3: To attract uses that strengthen the economic base and expand market opportunities for existing and new businesses.

Objective 2-4: To enhance the identity of distinctive commercial districts and to identify Pedestrian Oriented Areas (POA's).

Objective 2-5: To enhance the appearance of commercial districts.

Objective 2-6: To maintain and increase the commercial employment base for community residents whenever possible.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities that are safe for the environment and the work force, and that have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for existing and future industrial uses that contribute job opportunities for residents and that minimize environmental and visual impacts to the community.

Objective 3-2: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

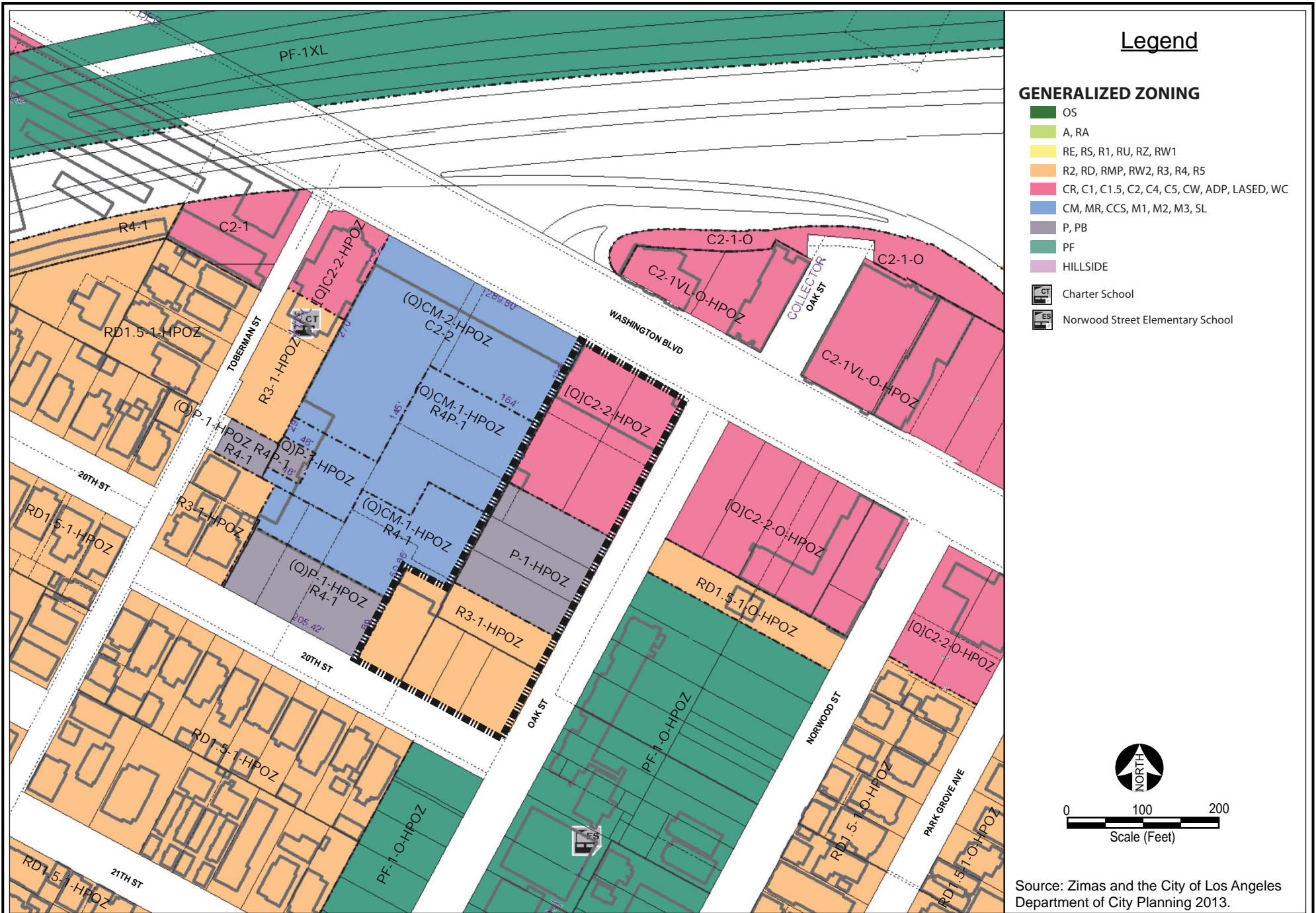
Los Angeles Municipal Code (LAMC)

The existing zoning for the Project site is as follows (refer to Figure IV.G-2):

- **Commercial Zone [Q]C2-2-HPOZ** - The “[Q]” indicates that residential uses at the density allowed under R4 and R5 zones are prohibited. The “C2” zoning represents the Project site’s Commercial classification and permits most uses allowed under the “C1” and “C1.5” zoning, including local retail stores, offices, hotels, hospitals, museums, service stations and garages, churches, schools, auto sales, and certain (R3 and R4) residential uses. The “2” represents “Height District 2,” which does not specify maximum heights for development but establishes a maximum floor area ratio (FAR) of 6:1. The “HPOZ” indicates that the Project site is located within a Historic Preservation Overlay Zone and is subject to the requirements of the University Park Historic Preservation Overlay Zone.
- **Multi-Family Residential R3-1-HPOZ** - The “R3” represents the Project site’s Multi-Family Residential land use designation and permits most uses in the “R1 and R2 zones, including one-family and two-family dwellings, home occupations plus apartment houses, multiple dwellings, and small child care facilities. The “1” represents “Height District 1,” which does not specify maximum heights for development but establishes a maximum floor area ratio (FAR) of 1.5:1. Again, the “HPOZ” indicates the Project site is subject to the requirements of the University Park Historic Preservation Overlay Zone.
- **Automobile Parking Zone P-1-HPOZ** - The “P” represents the Project site’s Automobile Parking Zone land use designation and permits both surface and underground parking facilities. The “1” represents “Height District 1,” which does not specify maximum heights for development but establishes a maximum floor area ratio (FAR) of 1.5:1. Again, the “HPOZ” indicates the Project site is subject to the requirements of the University Park Historic Preservation Overlay Zone.

Also, the Project site is located in a mapped Methane Buffer Area. Division 71 of the LAMC sets forth the City’s minimum requirements for control of methane intrusion emanating from geologic formations. All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone must comply with these requirements and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards provide information describing the installation procedures, design parameters and test protocols for the methane gas mitigation systems.







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### Walkability Checklist

The purpose of the *Walkability Checklist* for Entitlement Review is to guide Department of City Planning staff as well as developers, architects, engineers, and all community members in creating enhanced pedestrian movement, access, comfort, and safety, contributing to the walkability of the City. The *Walkability Checklist* encourages pursuit of high quality City form, including urban, suburban and rural areas and informs stakeholders about the tools and techniques that improve curb appeal, beauty, and usability through a location-specific approach. Placemaking, the act of designing buildings to make them more attractive to and compatible with the people who use them, is the primary design principle in creating walkable neighborhoods. The *Walkability Checklist* provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies on the Checklist should be considered in a proposed project, although not all will be appropriate in every proposed project. Each project will require a unique approach. While the checklist is neither a requirement nor part of the zoning code, it provides a guide for consistency relating with the policies contained in the General Plan Framework. Incorporating these guidelines into a project's design will encourage pedestrian activity, more appropriate forms, and placemaking. A project that is walkable is good for business and the environment. The *Walkability Checklist* is organized by main topics (i.e., Building Orientation). Each topic includes a statement of objectives and goals followed by a list of implementation strategies to be considered for incorporation into a proposed project. The topics begin with public sidewalks, crosswalks and on-street parking; then move to building orientation, on-site parking, and landscaping and finally focus on detailed building features such as lighting and signage. The Appendix contains relevant policies from the *General Plan* Framework. The staff of the Department of City Planning uses the *Walkability Checklist* in evaluating entitlement applications. In making a finding of conformance with the policies and objectives of the *General Plan*, the staff weighs the project's walkability against the adopted objectives listed in the Appendix and any additional objectives and policies contained in the applicable Community Plan. Generally, the *Walkability Checklist* applies to all discretionary approvals of new construction rather than rehabilitation.

### 2010 Bicycle Plan

The *2010 Bicycle Plan* (the “*Bicycle Plan*”) represents a new commitment by the City to complete streets and is part of a move away from the auto-centric approach of the past, and toward a sustainable transportation system—a system which supports motor vehicle use, but also enables the use of streets by other modes, such as bicycling, walking, and transit, and acknowledges the use of streets for other purposes, such as recreation, retail and public gatherings. The *Bicycle Plan* designates an ambitious 1,684-mile bikeway system and introduces a comprehensive collection of programs and policies. Among the elements of the plan are several innovations in bicycle planning for the City. The complementary networks of bike lanes on the Citywide Network, bicycle friendly streets on the Neighborhood Network, and bicycle lanes along the Green Network combine to create a bicycle transportation system for all users. Confident bicyclists can utilize the bicycle lanes along arterial streets typified by the Citywide Network. Less experienced bicyclists can utilize the local streets that have been enhanced with traffic calming

features along the Neighborhood Network. Lastly, bicyclists and pedestrians alike can utilize the bicycle paths along river channels and segregated rights-of-way in the Green Network. The Citywide, Neighborhood, and Green Networks combine to create a robust bikeway system for all users. The bikeway system in the vicinity of the Project site is shown on Figure IV.G-3. As shown, Washington Boulevard along the north side of the Project site is designated as a bike lane and is part of the backbone bike plan network.

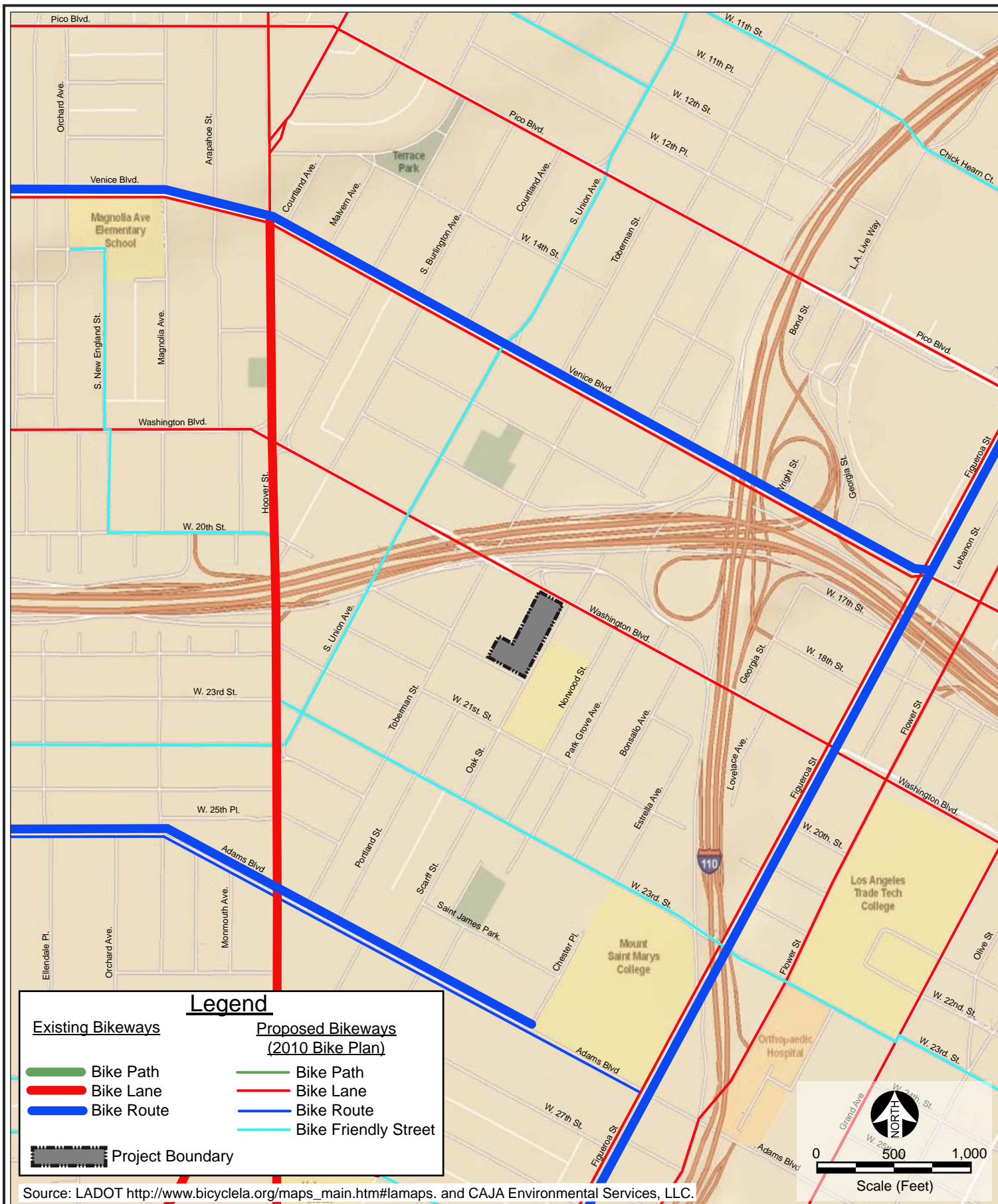
The *Bicycle Plan* is comprehensive, and the list of policies and programs is formidable. In order to organize these policies and programs, the plan sorts them into ten categories. These ten categories are based on the widely respected “Six E’s” of bicycle planning - equity, engineering, education, enforcement, encouragement, and evaluation - with two additional E’s added to the mix: environment and economics. By building off the respected framework of the Six E’s, the specifics of the plan are easier to understand and readily compared with other cities.

Finally, the *Bicycle Plan* comes with dynamic implementation procedures built in. The 2010 Plan includes a Five-year Implementation Strategy that details the sequencing and priorities for the selection and installation of new bikeway facilities. Since the circumstances affecting implementation of both infrastructure and non-infrastructure programs are unpredictable and shifting, the *Bicycle Plan* introduces a dynamic solution. Two groups, the existing City’s Bicycle Advisory Committee along with a new entity, the Bicycle Plan Implementation Team will monitor, assist and advise the implementation efforts. These groups, comprised of city staff from relevant departments, cycling community members, as well as local agencies and municipalities, create an opportunity for bike plan stakeholders to develop a rapport and thus facilitate the implementation process.

Collectively, the various strategies and components of the *Bicycle Plan* assist the City to meet the three goals that have been established by this plan: 1) increase the number and types of bicyclists who bicycle in the City; 2) make every street a safe place to ride a bicycle, and 3) make the City a bicycle friendly community.

### *Citywide Design Guidelines*

The City’s General Plan Framework Element and each of the City’s 35 Community Plans promote architectural and design excellence in buildings, landscape, open space, and public space. They also stipulate that preservation of the City’s character and scale, including its traditional urban design form, shall be emphasized in consideration of future development. To this end, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character, while promoting design excellence and creative infill development solutions. The Citywide Design Guidelines serve to implement the 10 Urban Design Principles, a part of the Framework Element. These principles are a statement of the City’s vision for the future of Los Angeles, providing guidance for new development and encouraging projects to complement existing urban form in order to enhance the built environment in the City. While called “urban,” the Urban Design Principles reflect citywide values



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to be expressed in the built environment of the City, establishing a design program for the City. They are intended to embrace the variety of urban forms that exist within Los Angeles, from the most urban, concentrated centers to our suburban neighborhoods.

The 10 Urban Design Principles are as follows:

1. Develop inviting and accessible transit areas
2. Reinforce walkability, bikeability, and well-being
3. Nurture neighborhood character
4. Bridge the past and the future
5. Produce great green streets
6. Generate public open space
7. Stimulate sustainability and innovation in the city
8. Improve equity and opportunity
9. Emphasize early integration, simple processes, and maintainable solutions
10. Ensure connections

*North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay District (NSO)  
(Ordinance 180218)*

On November 16, 2008, the City adopted the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay District (the “NSO”) (Ordinance 180218). The NSO District extends from the I-10 Freeway to the north, the I-110 Freeway to the east, Martin Luther King Jr. Boulevard to the south, and Normandie Avenue to the west. The purposes of the NSO District are as follows:

1. Promote well-planned housing to meet the needs of college/university student housing, and the needs of the community.
2. Address impacts of multiple-habitable room projects, which may be incompatible with surrounding development.
3. Encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects.
4. Ensure that the Project provides adequate on-site parking.
5. Address a concentration of campus-serving housing in the vicinity.

*Figueroa Corridor Economic Development Strategy*

The Figueroa Corridor Streetscape Project (My Fig) consists of 4.5 miles of roadways, of which three miles are along Figueroa Street through Downtown and South Los Angeles from 7<sup>th</sup> Street to Martin Luther King Jr. Boulevard. The My Fig includes pedestrian improvements on Bill Robertson Lane in order to provide better linkages to the Exposition Light Rail Line. This project would also include a one-

way westbound bicycle facility (along six blocks of 11<sup>th</sup> Street in Downtown Los Angeles from Broadway to Figueroa Street). In addition, a separate project, the Downtown LA Streetcar Project includes track service on both 11<sup>th</sup> Street and Figueroa Street. The bicycle and streetscape facilities of My Fig would coexist with the streetcar where applicable.

The My Fig includes a combination of one-way separated bike lanes (in the direction of adjacent traffic) within the existing roadbed and between the curb and on-street parking. Some segments will be separated from vehicular traffic lanes by physical barriers (such as parking), and other segments will be standard bike lanes with painted buffers. Vehicular travel lanes would be reduced where necessary to incorporate these facilities within the existing curb-to-curb roadbed, and to maintain safe and efficient operation for all users.

#### Revised My Fig Project

In response to some of the concerns raised during the comment period, LADOT revised My Fig since the circulation of the Draft EIR. The Revised My Fig Project would continue to reduce traffic lanes in several segments along South Figueroa Street, though to a lesser degree than originally proposed and evaluated in the Draft EIR. The Revised My Fig Project would eliminate one southbound mixed-flow travel lane and the peak-period northbound lane along Figueroa Street between Martin Luther King Jr. Boulevard and Exposition Boulevard. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, two south-bound mixed-flow travel lanes and a buffered bicycle lane in each direction.

Between Exposition Boulevard and Adams Boulevard, the Revised My Fig Project would eliminate the peak-period north-bound lane and one full-time north-bound mixed-flow travel lane. Between Exposition Boulevard and 30<sup>th</sup> Street, the Revised Proposed Project would eliminate the peak-period south-bound lane. The revised configuration between Exposition Boulevard and Adams Boulevard will be two north-bound mixed-flow travel lanes, and two south-bound mixed-flow travel lanes. Cycle tracks are proposed from Exposition Boulevard to 21<sup>st</sup> Street in each direction.

Between Adams Boulevard and Venice Boulevard, the peak-period southbound lane and one northbound mixed-flow travel lane would be eliminated. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, one north-bound peak-period bus lane (mixed-flow off-peak), and one south-bound mixed-flow travel lanes. Between Venice Boulevard and 8<sup>th</sup> Street, one northbound mixed-flow travel lane would be eliminated. From Venice Boulevard to Olympic Boulevard, there will be two full time mixed-flow travel lanes in the southbound direction and two full-time mixed-flow travel lanes and one peak-period bus-only lane (mixed-flow off-peak) in the northbound direction. Buffered bicycle lanes are currently proposed between 21<sup>st</sup> Street and 11<sup>th</sup> Street in each direction.

From Olympic Boulevard to 9<sup>th</sup> Street, there will be a two full-time north-bound mixed-flow travel lanes and a peak-period bus-only lane, and a between 8<sup>th</sup> Street and 9<sup>th</sup> Street an additional peak-period mixed-flow lane on the west side of the roadway, which becomes a full time lane just north of 8<sup>th</sup> Street. A cycle track is proposed from 11<sup>th</sup> to 7<sup>th</sup> Street in the northbound direction only.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

#### ***CEQA Guidelines***

In accordance with Appendix G to the *CEQA Guidelines*, a project would have a significant impact if the project would do one or more of the following:

- a) Physically divide an established community;
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

#### ***L.A. CEQA Thresholds Guide***

Based on criteria established in the *L.A. CEQA Thresholds Guide*, whether a project would have a significant impact is determined on a case-by-case basis considering the following factors:

- 1. Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site.
- 2. Whether the proposal is inconsistent with the *General Plan* or adopted environmental goals or policies contained in other applicable plans;
- 3. The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- 4. The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- 5. The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.



### ***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant) of this EIR, the Project would not have significant impacts regarding issues “a” and “c” listed under the *CEQA Guidelines*. Thus, no further analysis of these issues is required in this section.

Regarding factor 4 listed under the *L.A. CEQA Thresholds Guide*, this factor is similar to issue “a” listed under the *CEQA Guidelines*. As discussed in Section IV.A (Impacts Found to be Less Than Significant) of this EIR, the Project would not result in any significant impacts related to this issue. Thus, no further analysis of factor 4 is required in this section.

All of the remaining factors listed under the *L.A. CEQA Thresholds Guide* are considered along with issue “b” listed under the *CEQA Guidelines* to determine the Project’s consistency with applicable plans, policies, and regulations.

### **Project Impacts**

#### ***Consistency with Applicable Land Use Plans, Policies, or Regulations***

##### *Compass Growth Vision*

The Project would be generally consistent with applicable principles of the *Compass Growth Vision* report as it would utilize an existing urbanized site that is accessible to transit, thereby preserving other open space areas. The Project’s consistency with the specific applicable principles of the *Compass 2% Strategy* is discussed on Table IV.G-1. As shown, the Project would be consistent with the applicable land use principles of the *Compass 2% Strategy*.

**Table IV.G-1**  
**Consistency of the Project with Applicable Principles of the *Compass 2% Strategy***

<b>Principle</b>	<b>Consistency Discussion</b>
<u>Improve Mobility for All Residents</u> <ul style="list-style-type: none"> <li>Encourage transportation investments and land use decisions that are mutually supportive</li> <li>Locate new housing near existing jobs and new jobs near existing housing</li> <li>Encourage transit-oriented development</li> <li>Promote a variety of travel choices</li> </ul>	<b>Consistent.</b> The Project site is located in an urbanized portion of the City that is already served by well-established transit lines (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]), pedestrian infrastructure (sidewalks and crosswalks throughout the area), and bicycle lanes near the site (refer to Figure IV.G-3) that lead to employment and commercial land uses and that would provide the future residents of the Project alternate transportation uses.
<u>Foster Livability in all Communities</u> <ul style="list-style-type: none"> <li>Promote infill development and redevelopment to revitalize existing communities</li> </ul>	<b>Consistent.</b> The Project includes redevelopment of the Project site with residential uses. The site is already served by well-established transit lines (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]), pedestrian infrastructure (sidewalks and crosswalks

**Table IV.G-1**  
**Consistency of the Project with Applicable Principles of the *Compass 2% Strategy***

<b>Principle</b>	<b>Consistency Discussion</b>
<ul style="list-style-type: none"> <li>Promote developments that provide a mix of uses</li> <li>Promote “people-scaled,” pedestrian-friendly communities</li> <li>Support the preservation of stable, single-family neighborhoods</li> </ul>	<p>throughout the area), and bicycle lanes near the site (refer to Figure IV.G-3). The Project would not affect any single-family neighborhoods or existing natural/green spaces. Regarding “people-scaled experiences,” refer to the Project’s consistency with strategies of the <i>Walkability Checklist</i> on Table IV.G-5.</p>
<p><u>Enable Prosperity for all People</u></p> <ul style="list-style-type: none"> <li>Provide a range of housing types so that people of all income levels can live comfortably and safely.</li> <li>Treat communities equitably when it comes to environmental issues so that one area or group of people does not bear an unfair burden.</li> </ul>	<p><b>Consistent.</b> The Project would provide 142 multi-family residential units, designed to meet the housing needs of the community. No one area or group would be burdened with environmental issues due to the Project.</p>
<p><u>Enable Prosperity for all People</u></p> <ul style="list-style-type: none"> <li>Provide a variety of housing types in each community to meet the housing needs of all income levels.</li> <li>Support educational opportunities that promote balanced growth</li> <li>Ensure environmental justice regardless of race, ethnicity or income class</li> <li>Support local and state fiscal policies that encourage balanced growth</li> <li>Encourage civic engagement</li> </ul>	<p><b>Consistent.</b> The Project would provide 142 multi-family residential units, designed to meet the housing needs of the community. No one area or group would be burdened with environmental issues due to the Project.</p>
<p><u>Promote Sustainability for Future Generations</u></p> <ul style="list-style-type: none"> <li>Preserve rural, agricultural, recreational and environmentally sensitive areas</li> <li>Focus development in urban centers and existing cities</li> <li>Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste</li> <li>Utilize “green” development techniques</li> </ul>	<p><b>Consistent.</b> As discussed in Section IV.C (Air Quality), the Project would not result in any significant impacts related to green house gases. Additionally, the Project site is located in an urbanized portion of the City that is already served by well-established transit lines (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]), pedestrian infrastructure (sidewalks and crosswalks throughout the area), and bicycle lanes near the site (refer to Figure IV.G-3) that lead to employment and commercial centers that would provide the future residents of the Project alternate transportation uses.</p> <p>Additionally, the Project would be developed in accordance with the City’s Green Building standards, and would include features such as light colored roofs to buffer direct sunlight; natural ventilation; insulated hot</p>

**Table IV.G-1**  
**Consistency of the Project with Applicable Principles of the *Compass 2% Strategy***

Principle	Consistency Discussion
	water pipes; etc. (refer to Section III [Project Description]).
<i>Source: Southern California Association of Governments, Southern California Compass 2% Strategy, Compass Growth Vision, June 2004.</i>	

2008 Regional Comprehensive Plan (RCP)

A detailed analysis of the Project's consistency with the relevant policies in the 2008 RCP is presented in Table IV.G-2. As discussed, the Project would be consistent with all of the applicable 2008 RCP policies.

**Table IV.G-2**  
**Consistency of the Project with Applicable Policies of the 2008 RCP**

Policy	Consistency Discussion
<b>Land Use and Housing</b>	
LU-4 Local governments should provide for new housing, consistent with State Housing Element law, to accommodate their share of forecast regional growth.	<b>Consistent.</b> The Project would provide 142 for-sale dwelling units, including four townhouse structures with a total of 8 four-bedroom units and two condominium structures with a total of 32 one-bedroom units, 76 two-bedroom units, 24 three-bedroom units, and 2 four-bedroom units.
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the US Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	<b>Consistent.</b> The Project would be developed in accordance with the City's Green Building standards, and would include features such as light colored roofs to buffer direct sunlight; natural ventilation; insulated hot water pipes; etc. (refer to Section III [Project Description]).
<b>Open Space and Habitat</b>	
OSC-8 Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	<b>Consistent.</b> The Project is an infill development that would occur at a site that is already served by existing roadway, utility, and public service infrastructure.
OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	<b>Consistent.</b> The Project is an infill development that would provide 142 for-sale dwelling units, including four townhouse structures with a total of 8 four-bedroom units and two condominium structures with a total of 32 one-bedroom units, 76 two-bedroom units, 24 three-bedroom units, and 2 four-bedroom units.
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes, and other implementation mechanisms.	<b>Consistent.</b> As discussed in Section IV.E (Greenhouse Gas Emissions), the Project would be required to implement all applicable measures of the L.A. Green Building Code.  Also, as discussed in Section IV.L (Utilities – Solid Waste), the City implements a variety of solid waste reduction plans and regulations to maximize recycling and minimize solid waste generation. Consistent with City recycling

**Table IV.G-2**  
**Consistency of the Project with Applicable Policies of the 2008 RCP**

Policy	Consistency Discussion
	requirements, the Project Applicant would provide recycling facilities and clearly marked, durable, source sorted recycling bins throughout the Project site to facilitate recycling in accordance with City Ordinances 171687 and 181227. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) Assembly Bill (AB) 939, City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), Source Reduction and Recycling Element (SRRE), City Ordinance No. 171687, and the Framework Element of the General Plan.
OSC-12 Developers and local governments should promote water-efficient land use development.	<b>Consistent.</b> As discussed in Section IV.L (Utilities – Water), the Project Applicant would comply with the City’s Department of Water and Power (DWP) water-conservation measures outlined in Mitigation Measures K-1 through K-9.
<b>Water</b>	
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	<b>Consistent.</b> As discussed in Section IV.L (Utilities – Water), DWP could accommodate the Project’s demand for water supply via the existing mains serving the Project site.
WA-12 Developers and local governments should reduce exterior uses of water in public areas and should promote reduced use in private homes and businesses by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	<b>Consistent.</b> As discussed in Section IV.L (Utilities – Water), the Project Applicant would comply with DWP water conservation measures (outlined in Mitigation Measures L-1 through L-9), which include use of drought-tolerant, low-water consuming plants, a water-conserving landscape system, low-flush high-efficiency toilets, and high-efficiency clothes washers.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	<b>Consistent.</b> As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project site is currently completely impervious due to existing development. As discussed in Section IV.F (Hydrology & Water Quality), the Project Applicant would be required to incorporate site-specific best management practices (BMPs) (such as minimizing impervious areas, maximizing permeability, minimizing directly connected impervious areas, and creating reduced or “zero discharge” areas) to ensure the Project meets/exceeds City and RWQCB water quality standards. Additionally, considering that the effectiveness of existing water quality BMPs used at the site likely does not meet current water quality standards, the quality of drainage from the site would likely

**Table IV.G-2**  
**Consistency of the Project with Applicable Policies of the 2008 RCP**

Policy	Consistency Discussion
	improve under the Project when compared to the existing condition.
<p>WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.</p>	<p><b>Consistent.</b> Regarding water management practices, refer to the Project's consistency with Policy WA-27. As discussed in Section IV.L (Utilities – Electricity), the Project Applicant would incorporate various DWP energy conservation measures as outlined in Mitigation Measures L-11 through L-36.</p>
<b>Energy</b>	
<p>EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution, and significantly reduce waste into their projects, zoning codes, and other implementation mechanisms:</p> <ul style="list-style-type: none"> <li>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure.</li> <li>• Land use and planning strategies to increase biking and walking trips.</li> </ul>	<p><b>Partially Consistent.</b> Although the Project is an urban infill development in a transit-rich environment, the Project is not a mixed-use development and would not add to the pedestrian or bicycle infrastructure to increase accessibility; the Project would use urban design to encourage walking/cycling, but not land use and planning strategies, per se.</p>
<p>EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Using energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>• Encouraging new development to exceed Title 24 energy efficiency requirements.</li> <li>• Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.</li> <li>• Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at <a href="http://www.energystar.gov/index.cfm?c=Projects.pr_tax_cr_edits">http://www.energystar.gov/index.cfm?c=Projects.pr_tax_cr_edits</a>.</li> <li>• Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.</li> <li>• Encouraging combined heating and cooling (CHP), also</li> </ul>	<p><b>Consistent.</b> Refer to the Project's consistency with policy OSC-11.</p>

**Table IV.G-2**  
**Consistency of the Project with Applicable Policies of the 2008 RCP**

Policy	Consistency Discussion
<p>known as cogeneration, in all buildings.</p> <ul style="list-style-type: none"> <li>• Encouraging neighborhood energy systems, which allow communities to generate their own electricity.</li> <li>• Orienting streets and buildings for best solar access.</li> <li>• Encouraging buildings to obtain at least 20% of their electric load from renewable energy.</li> </ul>	
<p>EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p><b>Consistent.</b> As discussed in Section IV.L (Utilities – Energy), electricity service to the Project area is provided by DWP, and natural gas service is provided by Southern California Gas (SoCalGas). Correspondence requesting service information related to the Project was sent to DWP and SoCalGas (refer to Appendix IV.K). As discussed in Section IV.L, the Project Applicant would be required to coordinate with DWP and SoCalGas during the Project’s construction phase to determine the specific requirements for connection to existing energy infrastructure and would be responsible for installation of any connection infrastructure.</p>
<p>EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.</p>	<p><b>Partially Consistent.</b> Although the Project would not include solar panels, the Project would receive electricity supply from DWP, which obtains electricity supplies from renewable sources, including wind, solar, hydropower, geothermal, and biomass.</p>
<b>Solid Waste</b>	
<p>SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>• Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap materials through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</li> <li>• Reuse of existing building structure and shell in renovation projects.</li> </ul>	<p><b>Consistent.</b> As discussed in Section IV.L (Utilities – Solid Waste), the City implements a variety of solid waste reduction plans and regulations to maximize recycling and minimize solid waste generation during both construction and operational phases of projects. One such regulation includes the Citywide Construction and Demolition (C&amp;D) Waste Recycling Ordinance (Ordinance 181519) that requires all mixed C&amp;D waste generated within City limits be taken to City certified C&amp;D waste processors. The Project Applicant would comply with this ordinance.</p> <p>Also, consistent with City recycling requirements, the Project Applicant would provide recycling facilities and clearly marked, durable, source sorted recycling bins throughout the Project site to facilitate recycling in accordance with City Ordinances 171687 and 181227. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but</p>

**Table IV.G-2**  
**Consistency of the Project with Applicable Policies of the 2008 RCP**

Policy	Consistency Discussion
<p>Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Development of indoor recycling program and space.</li> <li>• Design for deconstruction.</li> <li>• Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable components.</li> </ul>	<p>not limited to) Assembly Bill (AB) 939, City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), Source Reduction and Recycling Element (SRRE), City Ordinance No. 171687, and the Framework Element of the General Plan.</p>
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	<b>Consistent.</b> Refer to the Project's consistency with policy SW-14.
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	<b>Consistent.</b> Refer to the Project's consistency with policy SW-14.
<i>Source: Southern California Association of Governments, Regional Comprehensive Plan, October 2008.</i>	

*Southern California Regional Transportation Plan (RTP)*

The consistency of the Project with the applicable goals of the RTP is discussed on Table IV.G-3. As discussed, the Project would be consistent with the applicable goals of the RTP. Therefore, the Project would not conflict with the RTP.

**Table IV.G-3**  
**Consistency of the Project with Applicable Goals of the RTP**

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	<p><b>Consistent.</b> The Project is an infill housing development consisting of 142 residential units. The Project site is located within close proximity to several multi-modal corridors such as Hoover Street, Figueroa Street, and Washington Boulevard. The characteristics of the nearby multi-modal corridors and close proximity to Downtown Los Angeles promote alternative transportation modes (e.g., pedestrian, bicycle, regional and local bus transit). The alternative transportation modes coexist and share the roadway, reinforcing the concept of a balanced and effective transportation system. In addition, the Project is situated within easy walking distance to existing retail, restaurant, and other commercial businesses located along the Hoover Street and Figueroa Street corridors. Further, regional and local public bus transit stops are provided near the Project site on Hoover Street, Figueroa Street, and Washington Boulevard, as</p>

**Table IV.G-3**  
**Consistency of the Project with Applicable Goals of the RTP**

Goal	Consistency Discussion
	well as immediately adjacent to the Project site, by Metro and LADOT.
Actively encourage and create incentives for energy efficiency, where possible.	<b>Consistent.</b> The Project would be developed in accordance with the City's Green Building standards, and would include features to promote energy efficiency, such as light colored roofs to buffer direct sunlight; natural ventilation; insulated hot water pipes; etc. (refer to Section III [Project Description]).
Encourage land use growth patterns that facilitate transit and non-motorized transportation.	
<i>Source: SCAG, RTP, 2012.</i>	

#### Air Quality Management Plan (AQMP)

A detailed discussion of the Project's consistency with the *AQMP* is included in Section IV.C (Air Quality). As discussed in that section, the Project is consistent with the *AQMP*.

#### 2010 Congestion Management Program for Los Angeles County (CMP)

The *CMP* requires analysis of all arterial-monitoring intersections where a project is expected to add 50 or more peak-hour trips and analysis of all *CMP* freeway-monitoring locations where a project is expected to add 150 or more peak hour trips in either direction. The traffic study prepared for the Project (refer to Section IV.K [Transportation/Traffic]) identified one *CMP* intersection monitoring location in the vicinity of the Project site (Alvarado Boulevard), and two *CMP* freeway monitoring locations are located within proximity to the Project site (Santa Monica Freeway at Budlong Avenue and Harbor Freeway at Slauson Avenue). Based on the Project's traffic generation and distribution, the Project would not add 50 or more peak-hour trips at the *CMP* intersection monitoring locations noted above. As such, no additional *CMP*-related traffic analysis is required, and the Project would not conflict with the *CMP*.

#### General Plan

Consistency of the Project with the applicable policies in the *General Plan* is included on Table IV.G-4. (The Project's consistency with the policies associated with the Framework Element is included on Table IV.G-5.) As shown on Table IV.G-4, the Project is consistent with all of the other applicable policies of the *General Plan*.



**Table IV.G-4**  
**Consistency of the Project with Applicable Policies of the *General Plan***

Policy	Consistency Discussion
<p><b>Air Quality Element</b></p> <p><b>Policy 1.3.1:</b> Minimize particulate emissions from construction sites.</p>	<p><b>Consistent.</b> Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at the Project site during construction of the Project would be minimized. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 1.3.2:</b> Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.</p>	<p><b>Consistent.</b> Construction activities associated with the Proposed Project would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, which would require appropriate dust control measures to be implemented during each phase of development. It should be noted that due to the size of the Project site, no unpaved roads would be present or used during the construction of the Project. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 4.2.2:</b> Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.</p>	<p><b>Consistent.</b> The Project is an infill housing development consisting of 142 residential units that would serve the local community. The Project is situated within walking distance to existing retail, restaurant, and other commercial businesses located along Hoover Street, Venice Boulevard, Flower Street, and Figueroa Street. Further, regional and local public bus transit stops are provided near the Project site on Hoover Street, Figueroa Street, and Washington Boulevard, as well as immediately adjacent to the Project site (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]). Additionally, as shown on Figure IV.G-3, Washington Boulevard along the north side of the Project site is designated as a bike lane and is part of the backbone bike plan network. The proximity of the Project site to these transit stops and bike network would allow residents of the Project to access neighborhood-serving retail uses in the surrounding areas, including Downtown Los Angeles. Therefore, the Project would be consistent with this policy.</p>
<p><b>Policy 4.2.3:</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p><b>Consistent.</b> The Project is an infill housing development consisting of 142 residential units. The Project site is located within close proximity to several multi-modal (e.g., pedestrian, bicycle, regional and local bus transit) corridors such as Hoover Street, Figueroa Street, and Washington Boulevard. The characteristics of the nearby multi-modal corridors and close proximity to Downtown Los Angeles promote alternative transportation modes (e.g., pedestrian, bicycle, regional and local bus transit). The alternative transportation modes coexist and share</p>

**Table IV.G-4**  
**Consistency of the Project with Applicable Policies of the *General Plan***

Policy	Consistency Discussion
	the roadway, reinforcing the concept of a balanced and effective transportation system. In addition, the Project is situated within walking distance to existing retail, restaurant, and other commercial businesses located along the Hoover Street and Figueroa Street. Further, regional and local public bus transit stops are provided near the Project site on Hoover Street, Figueroa Street, and Washington Boulevard, as well as immediately adjacent to the Project site, by Metro and LADOT. Thus, the Project would be consistent with this policy.
<b>Policy 4.2.4:</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	<b>Consistent.</b> The air quality analysis conducted for the Project in this Draft EIR serves to identify potential air quality impacts and, if necessary, recommend mitigation measures to reduce these impacts to a less than significant level. Where no feasible mitigation measures are available to address a particular impact, a significant and unavoidable impact is identified for the Project in this Draft EIR. The analysis in this Draft EIR will be used by the City's Planning Commission in its review and approval process for the Project. Therefore, the Project would be consistent with this policy.
<b>Policy 4.2.5:</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	<b>Consistent.</b> The Project is an infill housing development consisting of 142 residential units. The Project site is located within close proximity to several multi-modal (e.g., pedestrian, bicycle, regional and local bus transit) corridors such as Hoover Street, Figueroa Street, and Washington Boulevard. The characteristics of the nearby multi-modal corridors and close proximity to Downtown Los Angeles promote alternative transportation modes (e.g., pedestrian, bicycle, regional and local bus transit) and a reduction on vehicle trips. In addition, the Project is situated within walking distance to existing retail, restaurant, and other commercial businesses located along the Hoover Street and Figueroa Street. Further, regional and local public bus transit stops are provided near the Project site on Hoover Street, Figueroa Street, and Washington Boulevard, as well as immediately adjacent to the Project site, by Metro and LADOT. Thus, the Project would be consistent with this policy.
<b>Conservation Element</b>  <b>Policy:</b> Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities.	<b>Consistent.</b> As discussed in Section IV.A (Impacts Found to be Less Than Significant), a records search for potential important archaeological resources at the Project site and within the Project area revealed that no such resources exist at the site. Additionally, the Project Applicant would comply with the City's Standard Mitigation Measures related to the protection of potentially unknown resources that could be encountered at the site during excavation/grading.

**Table IV.G-4**  
**Consistency of the Project with Applicable Policies of the General Plan**

<b>Policy</b>	<b>Consistency Discussion</b>
<b>Policy:</b> Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.	<b>Consistent.</b> As discussed in Section IV.D (Cultural Resources), as the Project would undergo design review and approval by the University Park HPOZ Board to ensure consistency with the Preservation Plan Design Guidelines, impacts to the University Park HPOZ would be less than significant.
<b>Policy:</b> Continue to reduce pollutant discharge into the bays from both natural and human sources.	<b>Consistent.</b> As discussed in Section IV. F (Hydrology & Water Quality), the Project would comply with all applicable water quality requirements and would not result in any significant water quality impacts. Additionally, it is possible that the Project could improve the quality of water discharging from the site by implementing new and more stringent water Quality Best Management Practices (BMPs) than what likely exist at the site in its current condition.
<b>Housing Element</b>	<b>Consistent.</b> The Project includes development of the Project site with 142 for-sale multi-family residential units.
<b>Policy 1.1.1:</b> Promote home ownership opportunities and support current homeowners in retaining their homeowner status.	
<b>Policy 1.1.3:</b> Facilitate new construction of a variety of housing types that address current and projected needs of the city's households.	<b>Consistent.</b> The Project includes development of the Project site with a total of 142 for-sale multi-family units. Four townhouse structures (total of 8 four-bedroom units) would be located on the western portion of the Project site along 20 <sup>th</sup> Street. Two condominium structures would house 134 units comprising 32 one-bedroom units, 76 two-bedroom units, 24 three-bedroom units, and 2 four-bedroom units. All units would range in size from approximately 700 square feet to 2,100 square feet.
<b>Policy 2.2.1:</b> Provide incentives to encourage the integration of housing with other compatible land uses.	<b>Consistent.</b> The Project includes development of residential land uses in an area that is developed with various commercial and residential land uses.
<b>Policy 2.2.3:</b> Provide incentives and flexibility to generate new housing and to preserve existing housing near transit.	<b>Consistent.</b> The Project includes development of residential land uses at a site that is served by several bus lines.
<b>Policy 2.2.4:</b> Promote and facilitate a jobs/housing balance at a citywide level.	<b>Consistent.</b> The Project includes development of residential land uses at a site in a highly urbanized area of the City that is in proximity to employment centers and transit lines.
<b>Policy 2.2.6:</b> To accommodate projected growth to 2014 in a sustainable way, encourage housing in centers and near transit, in accordance with the General Plan Framework Element, as reflected in Map ES.1.	<b>Consistent.</b> Map ES 1 identifies the Project site/area as being located within 1,500 feet of rail and an Orange Line Stop. The Project would include development of housing within this area.
<b>Policy 2.3.2:</b> Promote and facilitate reduction of water consumption in new and existing housing.	<b>Consistent.</b> As discussed in Section IV.K (Utilities - Water), the Project would implement various water consumption measures (refer to City Standard Mitigation Measures K-1 through K-9) to reduce the Project's demand for water supply.

**Table IV.G-4**  
**Consistency of the Project with Applicable Policies of the *General Plan***

Policy	Consistency Discussion
<b>Policy 2.3.3:</b> Promote and facilitate reduction of energy consumption in new and existing housing.	<b>Consistent.</b> As discussed in Section IV.K (Utilities - Energy), at a minimum, the Project would incorporate energy conservation measures that meet State energy conservation requirements, such as those established by Title 24.
<b>Policy 2.3.4:</b> Promote and facilitate reduction of waste in construction and building operations.	<b>Consistent.</b> As discussed in Section IV.K (Utilities – Solid Waste), it is likely that much of the construction waste generated by the Project would be recycled. Additionally, the Project would result in a net reduction in operation-related solid waste generation. Also, the Project would implement all applicable City solid waste reduction regulations.
<b>Policy 2.4.3:</b> Promote preservation of neighborhood character in balance with facilitating new development.	<b>Consistent.</b> As discussed in Section IV.D (Cultural Resources), the Project would demolish the existing catering facility and would replace it with a modern residential condominium/townhouse complex. Additionally, as discussed in detail in Section IV.D, in summary, the analysis of the Project’s consistency with the University Park HPOZ Preservation Plan (the “Preservation Plan”) finds that the Project complies with the vast majority of the Preservation Plan’s guidelines. Although the Project is still in the preliminary design stage, and colors, materials, and architectural details have not yet been selected, the Project Applicant has indicated that every possible effort would be made to select colors, materials, and architectural details that are compatible with the adjacent contributing buildings. The two main aspects of the Project that do not comply with the Preservation Plan is the lot coverage of the four town home buildings and the set back of the two condominium buildings. The lot coverage of the four town home buildings is greater than the historical development pattern of the HPOZ. However, this is not obvious from the public right-of-way. The four town homes occupy a larger percentage of the lot than what is typical in the HPOZ because the building footprints extend into the rear yards. The set back of the two condominium buildings is greater than the guideline for Commercial/Industrial Design Infill because the code requirement is 15 feet for multi-family residential buildings. As such, the guideline is inconsistent with the code. In some cases the guidelines are not applicable because they are related to features on commercial or industrial buildings such as storefronts, not multi-family residential buildings. In conclusion, as the Project would effectively conform to the letter and spirit of the Preservation Plan, historic impacts to the University Park HPOZ would be less than significant. Therefore, impacts related to visual character associated with the

**Table IV.G-4**  
**Consistency of the Project with Applicable Policies of the *General Plan***

<b>Policy</b>	<b>Consistency Discussion</b>
	University Park HPOZ would be less than significant.
<b>Policy 2.4.4:</b> Promote residential development that meets the needs of current residents as well as new residents.	<b>Consistent.</b> The Project includes development of residential land uses at a site that is in an area that is under served by housing and is near employment centers.
<b>Transportation Element</b>  <b>Policy 2.11:</b> Continue and expand requirements for new development to include bicycle storage and parking facilities, where appropriate.	<b>Consistent.</b> Bicycle storage/parking would occur within the residential units and likely would be added within the parking area. The final location of the bicycle storage/parking would be determined in coordination with the City during finalization of Project site plans.
<b>Policy 4.1:</b> <u>Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system.</u>	<b>Consistent.</b> As discussed in section IV.K (Transportation/Traffic), none of the Project's traffic would distribute to neighborhood streets, and Project impacts related to neighborhood intrusion would be less than significant.
<b>Policy 4.6:</b> <u>Consider the cultural aspects as well as the safety functions of existing street lighting when determining whether to refurbish or replace existing street lighting equipment.</u>	<b>Consistent.</b> During the Project's permit phase, the Project Applicant would be required to coordinate with the City's Bureau of Street Lighting to determine the street lighting requirements associated with the Project.
<i>Source: City of Los Angeles General Plan.</i>	

#### Framework Element

As previously discussed, the Framework Element states that the prevailing land uses and densities in conservation areas will be maintained and that new development should be comparable in type and scale with existing development. The Framework Element defers to the community plan for site-specific policies. As such, the Project's consistency with the Framework Element is considered per the existing community plan land use designations (see "*South Los Angeles Community Plan*" below).

#### South Los Angeles Community Plan

As previously discussed, the Project site is designated for Industrial Commercial Manufacturing land uses in the *South Los Angeles Community Plan*. The Project's consistency with the applicable policies set forth in the *South Los Angeles Community Plan* is included on Table IV.G-5. As discussed, the Project would be substantially consistent with all of the applicable policies of the *South Los Angeles Community Plan*.

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
<b>RESIDENTIAL</b>	
<b>Policy 1-1.1:</b> Designate specific lands to provide for adequate multi-family residential development.	<b>Partially Consistent.</b> The Project includes development of 142 multi-family residential units on a site designated for Commercial Manufacturing. In the immediate area, many parcels designated Low Medium II Multiple Family.
<b>Policy 1-1.2:</b> Protect existing single-family and low-density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	<p><b>Partially Consistent.</b> The Project site is not zoned for single-family residential land uses. The Project includes development of 142 multi-family residential units on a site that is adjacent to commercial, institutional, and single- and multi-family residential land uses. The Project would be developed at a medium-density (R3) level, which is allowed under the existing Commercial Manufacturing land use designation, but is not allowed under the existing P zoning. Thus, introducing medium-density residential at the Project site would encroach on existing residential land uses in the Project area.</p> <p>The tallest module (6-stories or 65.5 feet) fronts on Washington Boulevard and is located the furthest from the single-family homes on 20<sup>th</sup> Street. The center portion of the Project would step-down to four-stories (or 40-feet), while the southern portion of the Project that fronts on 20<sup>th</sup> Street would step-down to a height of two-stories (or 35 feet), similar to heights of the single-family houses on 20<sup>th</sup> Street.</p>
<b>Policy 1-1.3:</b> Require that new single-family and multi-family residential development be designed in accordance with the design standards.	<b>Consistent.</b> The City would require that the Project be designed in accordance with all applicable design standards (refer to the Project's consistency with applicable Urban Design policies in this table, below).
<b>Policy 1-2.1:</b> Locate higher residential densities near commercial centers, light mass transit stations, and major bus routes where public service facilities, utilities, and topography will accommodate this development.	<b>Consistent.</b> The Project is a higher density development (medium-density [R3] multi-family, compared to the low-medium density residential located mostly south of the Project site) located in proximity to retail, restaurant, and other commercial businesses located along the Hoover Street and Figueroa Street, Downtown Los Angeles, and major transit and bicycle routes. Existing public service facilities and utilities are available in the community (refer to Section IV.I [Public Services] and Section IV.K [Utilities]), and the site's flat topography would accommodate the development.
<b>Policy 1-2.2:</b> Locate senior citizen housing and mixed income housing, when feasible, near commercial centers and transit and public service facilities.	<b>Consistent.</b> The Project includes 131 market-rate units of various sizes plus 11 very-low-income units near Downtown Los Angeles where commercial centers, transit, and public service facilities are available.
<b>Policy 1-3.1:</b> Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	<b>Consistent.</b> As discussed in Section IV.B (Aesthetics), the Project would require approval by the University Park HPOZ Design Review Board to ensure compatible with the visual character of the surrounding neighborhood.
<b>Policy 1-3.2:</b> Consider factors such as	<b>Consistent.</b> As discussed in Section IV.B (Aesthetics), the

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.	Project would be compatible with the visual character of the surrounding neighborhood. As discussed in Section IV.I (Public Services) and Section IV.K (Utilities), Project impacts to public services and utilities (respectively) would be less than significant. Also, as discussed in Section IV.J (Transportation/Traffic), Project impacts related to traffic would be less than significant.
<b>Policy 1-4.1:</b> Protect and encourage reuse of the area's historic resources.	<b>Consistent.</b> As discussed in Section IV.D (Cultural Resources), Project impacts related to historic resources would be less than significant.
<b>Policy 1-5.1:</b> Promote greater individual choice in type, quality, price, and location of housing.	<b>Consistent.</b> The Project includes 131 market-rate units of various sizes plus 11 very-low-income units near Downtown Los Angeles where commercial centers, transit, and public service facilities are available.
<b>Policy 1-5.2:</b> Ensure that new housing opportunities minimize displacement of the residents.	<b>Consistent.</b> No housing exists on the Project site, and no residents would be displaced as a result of the Project.
<b>Policy 1-5.3:</b> Provide for development of townhouses and other similar condominium type housing units to increase home ownership options.	<b>Consistent.</b> The Project includes development of 131 for-sale market-rate townhouse and condominium units plus 11 very-low income condominium units.
<b>Policy 1-5.4:</b> Provide for the clustering of housing units to help decrease the effective cost of land per dwelling unit.	<b>Consistent.</b> The Project includes development of 142 units on 2.03 acres, or 51 units per acre. As such, the Project's high-density housing helps to decrease the effective cost of land per dwelling unit.
<b>Policy 1-6.1:</b> Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	<b>Consistent.</b> As discussed in Section IV.K (Transportation/Traffic), Project impacts related to traffic would be less than significant.
<b>Policy 1-6.3:</b> Consider the suitability of the geology in any proposal for development within the Plan area.	<b>Consistent.</b> As discussed in Section IV.A (Impacts Found to be Less Than Significant), through design and construction of the Project in conformance with the City's building code standards, no significant impacts related to geology would occur as a result of the Project.
<b>Policy 1-6.4:</b> Require that any proposed development be designed to enhance and be compatible with adjacent development.	<b>Consistent.</b> The City would require that the Project be designed in accordance with all applicable design standards (refer to the Project's consistency with applicable Urban Design policies in this table, below). Also, as discussed in Section IV.B (Aesthetics), the Project would be compatible with the visual character of the surrounding neighborhood.
<b>COMMERCIAL</b>	
<b>Policy 2-1.2:</b> Protect commercially planned/zoned areas from encroachment by residential only development.	<b>Inconsistent.</b> The Project proposes a residential-only development in a planned commercial area on a major transit and historically commercial corridor. Approval will require the decision-maker to make a finding that the proposed residential-only development along a commercial corridor is compatible in scale, character, and design with adjacent

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
	commercial development.
<b>Policy 2-4.2:</b> New development should add to and enhance the existing pedestrian street activity.	<b>Consistent.</b> The Project site is located in an urbanized portion of the City that is already served by well-established transit lines (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]), pedestrian infrastructure (sidewalks and crosswalks throughout the area), and bicycle lanes near the site (refer to Figure IV.G-3) that lead to employment and commercial land uses and that would provide the future residents of the Project alternate transportation uses, including walking, which would enhance the pedestrian activity in the Project area.
<b>Policy 2-4.10:</b> Promote mixed use projects in proximity to transit stations, along transit corridors, and in appropriate commercial areas.	<b>Inconsistent.</b> The Project is a residential-only development and does not include a commercial component.
<b>Policy 2-5.2</b> Preserve community character, scale and architectural diversity.	<b>Consistent.</b> As discussed in Section IV.B (Aesthetics), the Project would be compatible with the visual character of the surrounding neighborhood. Additionally, as discussed in Section IV.D (Cultural Resources), as the Project would undergo design review and approval by the University Park HPOZ Board to ensure consistency with the Preservation Plan Design Guidelines, impacts to the University Park HPOZ would be less than significant.
<b>Policy 2-5.3:</b> Improve safety and aesthetics of parking areas in commercial areas.	<b>Consistent.</b> The Project includes a subterranean parking garage that would not be visible from outside of the Project and would be secured with access-controlled entrances and exists and security.
<b>INDUSTRIAL</b>	
<b>Policy 3-1.1:</b> Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.	<b>Partially Inconsistent.</b> The Project includes development of medium-density residential land uses that are allowed under the existing land use designation for the Project site (Commercial Manufacturing). However, the Project does not include the development of any industrial-type land uses.
<b>Policy 3-1.2:</b> Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.	<b>Consistent.</b> Refer to the discussion of the Project's consistency with Policy 2-5.2.
<b>RECREATION AND PARKS FACILITIES</b>	
<b>Policy 4-1.2:</b> Increase accessibility to park land and other recreation areas	<b>Consistent.</b> As discussed in Section IV.J (Public Services) on Table IV.J-6, numerous parks and recreational facilities are located within two miles of the Project site.



**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
<b>Policy 4-1.3:</b> Actively pursue City and/or private funding for the acquisition and construction of new recreation and park facilities.	<b>Consistent.</b> As discussed in Section IV.J (Public Services) the Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space. In addition, the Project Applicant would be required to pay Quimby fees and/or Dwelling Unit Construction Tax in accordance with City regulations.
<b>POLICE PROTECTION</b>	
<b>Policy 9-1.3:</b> Encourage private developments to contribute to providing protection services to the residents of the community.	<b>Consistent.</b> Project shall be subject to the site plan review program, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC to improve on-site security through lighting, layout and design.
<b>FIRE PROTECTION</b>	
<b>Policy 10-1.1:</b> Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	<b>Consistent.</b> As required by this policy program, a decision maker shall include a finding as to the impact on fire service demands of the proposed Project. As discussed in Section IV.J (Public Services), the Project Applicant shall also implement standard mitigation measures J-1 through J-6, and the Project shall also be subject to the Fire Code and other applicable regulations of the LAMC.
<b>CIRCULATION - FREEWAYS, HIGHWAYS, AND STREETS</b>	
<b>Policy 11-1.1:</b> Maintain an LOS for streets and highways not to exceed LOS "D" for Secondary arterials, Collector streets and Local streets; not to exceed LOS "E" for Major Highways, and not to exceed LOS "E" in the Community's major business districts.	<b>Consistent.</b> As discussed in Section IV.K (Transportation/Traffic), the Project would not cause any of the study intersections to degrade below LOS C.
<b>Policy 11-1.2:</b> New development projects should be designated to minimize disturbance to existing traffic flow with proper ingress and egress to parking.	<b>Consistent.</b> As discussed in Section IV.K (Transportation/Traffic), to reduce potential conflicts associated with bicyclists, pedestrians, and vehicle drivers near the site, the Project includes reconstruction of some sidewalk areas adjacent to the Project site to allow for easier pedestrian flow and installation of caution signage for bicyclists, pedestrians, and drivers at the Project driveway. Further, to ensure that the Project would not cause safety conflicts associated with the Norwood Elementary School and Downtown Value School located in the vicinity of the Project site, the Project Applicant would comply with Mitigation Measures J-1 through J-11, which were provided by the LAUSD. With implementation of the safety measures listed above and Mitigation Measures J-1 and J-11, potential bicycle, pedestrian, and vehicular conflicts would be minimized, and impacts would be less than significant.
<b>Policy 11-1.3:</b> Highways and Street dedications shall be developed in accordance with standards and criteria contained in the Highways and Freeways Element of the General Plan and the City's Standard Street	<b>Consistent.</b> The Project Applicant would comply with any dedication requirements of the City.

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
Dimensions, except where environmental issues and planning practices warrant alternate standards consistent with capacity requirements.	
<b>Policy 11-2.1:</b> No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.	<b>Consistent.</b> As discussed in Section IV.K (Transportation/Traffic), the Project would not create any significant traffic impacts based on LADOT's significance criteria.
<b>Policy 11-2.2:</b> Require new development projects to mitigate off-site traffic impacts to the maximum extent feasible.	<b>Consistent.</b> As discussed in Section IV.K (Transportation/Traffic), the Project would not create any significant traffic impacts based on LADOT's significance criteria, and no mitigation measures are required.
<b>Policy 11-2.3:</b> Require that driveway access points onto major and secondary highways, arterials, and collector streets be limited in number and be located to ensure the smooth and safe flow of vehicles and bicycles.	<b>Consistent.</b> The Project includes one driveway access point on Oak Street. Also, refer to the discussion of the Project's consistency with Policy 11-1.2.
<b>Policy 11-2.4:</b> Require that new development install traffic signals at intersections on arterials when such is warranted on an individual case by case study.	<b>Consistent.</b> Refer to the discussion of the Project's consistency with Policy 11-2.2.
<b>LAND USE AND TRANSPORTATION</b>	
<b>NON-MOTORIZED TRANSPORTATION</b>	
<b>Policy 16-2.1:</b> Encourage the safe utilization of easements and/or rights-of-way along flood control channels, public rights-of-way and streets wherever possible for the use of bicycles and/or pedestrians.	<b>Consistent.</b> The Project includes redevelopment of the Project site with residential uses. The site is already served by well-established transit lines (refer to Figure IV.K-4 in Section IV.K [Transportation/Traffic]), pedestrian infrastructure (sidewalks and crosswalks throughout the area), and bicycle lanes near the site (refer to Figure IV.G-3).
<b>PARKING</b>	
<b>Policy 17-1.1:</b> Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto arterials.	<b>Consistent.</b> All parking for the Project would be located in a subterranean parking garage at the Project site. Also, the Project includes one access point on Oak Street.
<b>Policy 17-1.5:</b> New parking lots and new parking garages shall be developed in accordance with design standards.	<b>Consistent.</b> The design and construction of the Project's subterranean parking garage would comply with all applicable City standards.
<b>PRESERVATION OF HISTORIC AND CULTURAL AMENITIES</b>	
<b>Policy 19-2.1:</b> Encourage the preservation, maintenance, enhancement and adaptive reuse of existing buildings in commercial areas through the restoration of original facades and the design of new construction which complements old in a harmonious fashion, enhancing the historic pattern.	<p><b>Consistent.</b> As discussed in detail in Section IV.D (Cultural Resources), the Project site is located in the University Park Historic Preservation Overlay Zone (HPOZ), and the Project is subject to the University Park HPOZ Preservation Plan Design Guidelines.</p> <p>The Project's design details would be subject to HPOZ design review and approval. By the efforts of the Applicant</p>

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

Policy	Analysis
	<p>and through the HPOZ design review process, substantial compliance with the guidelines is ensured.</p> <p>The two main aspects of the Project that do not comply with the Preservation Plan is the lot coverage of the four town home buildings and the set back of the two condominium buildings. The lot coverage of the four town home buildings is greater than the historical development pattern of the HPOZ. However, this is not obvious from the public right-of-way. The four town homes occupy a larger percentage of the lot than what is typical in the HPOZ because the building footprints extend into the rear yards. The set back of the two condominium buildings is greater than the guideline for Commercial/Industrial Design Infill because the code requirement is 15 feet for multi-family residential buildings. As such, the guideline is inconsistent with the code. In some cases the guidelines are not applicable because they are related to features on commercial or industrial buildings such as storefronts, not multi-family residential buildings. In conclusion, as the Project would effectively conform to the letter and spirit of the Preservation Plan Design Guidelines, impacts to the University Park HPOZ would be less than significant.</p>
<b>URBAN DESIGN POLICIES - MULTIPLE RESIDENTIAL</b>	
<p>All multiple residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents. Toward that goal, the following policies are proposed:</p> <ol style="list-style-type: none"> <li>1. Providing a pedestrian entrance at the front of each project.</li> <li>2. Requiring useable open space for outdoor activities, especially for children.</li> </ol>	<p><b>Consistent.</b> As shown on Figures III-3 through III-5 in Section III (Project Description), pedestrian entrances are located along the portions of the Project that face Oak Street, Washington Boulevard, and 20<sup>th</sup> Street.</p> <p>The Project includes 21,722.61 square feet of public/common open space, or 24.91 percent of the Project site area, some of which could be used by children residing at the Project site. Public/common open space would consist of both landscape and hardscape areas. Additionally, the Project includes 13,440.6 square feet of private open space, consisting of private patios and balconies.</p>
<p><b>Design</b></p> <p>The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety or monotonous repetition. Achievement of this can be accomplished through:</p> <p>Requiring the use of articulations, recesses, surface perforations, porticoes to break up long, flat building facades.</p>	<p><b>Consistent.</b> As shown on Figures III-3 through III-5, the Project uses various architectural features and complimentary building materials to break up the building surfaces and to vary the appearance of the building levels. All building fixtures, awnings, doors and windows, and security gates would be integrated into the design of the Project. Also, the Project would comply with all LAMC requirements to screen rooftop equipment and trash areas.</p>

**Table IV.G-5  
Consistency of the Project with Applicable Policies  
of the South Los Angeles Community Plan**

<b>Policy</b>	<b>Analysis</b>
<p>Utilize complementary building materials in building facades.</p> <p>Consider the use of varying design features to provide definitions for each story in a development.</p> <p>Integrate building fixtures, awnings, security gates, etc. into the design of building.</p> <p>Screen all rooftop equipment and building appurtenances from adjacent properties.</p> <p>Require decorative, masonry walls to enclose trash.</p>	
<p><b><u>Parking Structures</u></b></p> <p>Parking structures shall be integrated with the design of the buildings they serve through:</p> <p>Design parking structure exteriors to match the style, materials and color of the main building.</p> <p>Maximize commercial uses on ground floors.</p> <p>Utilize landscaping to screen parking structures not architecturally integrated with the main building.</p> <p>Utilize decorative walls and/or landscaping to buffer residential uses from parking structures.</p>	<p><b>Consistent.</b> The Project includes subterranean parking that would not be visible.</p>
<p><i>Source: South Central Los Angeles Community Plan, and CAJA Environmental Services, 2011.</i></p>	

### Los Angeles Municipal Code

The current zoning on the Project site does not permit the proposed 142-unit residential condominium/townhouse complex. Therefore, the Project Applicant seeks to rezone portions of the Project site that are zoned P-1-HPOZ and R3-1-HPOZ to [Q]C2-2-HPOZ. In addition, the Project Applicant requests a 28 percent density bonus, pursuant to SB 1818, to provide 142 dwelling units including 11 very-low-income units, in lieu of the maximum permitted 111 units, with one incentive to permit a maximum 3:1 floor area ratio in lieu of the maximum 1.5:1 in the proposed CM-1-HPOZ zone.

The environmental impacts associated with the requested discretionary approvals, including rezoning the Project site and developing the site with 142 residential units, have been addressed throughout this Draft EIR. As disclosed in Sections IV.A through IV.K, with the exception of construction-related noise, the Project would not result in any significant impacts that could not be mitigated to less than significant with mitigation. The construction-related noise impact identified for the Project is not unique to the Project and has little to nothing to do with the requested zoning but would likely occur as a result of any development of the site, regardless of whether that development was allowed under the current zoning or not.

Several sections of the LAMC allow for application to change zoning development standards and consideration and approval/denial of these changes by the decision-making bodies, such as the Planning Commission, Zoning Administrator, and the City Council. With approval of the requested discretionary approvals, the Project would be required to be designed and constructed in conformance with the changed zoning requirements for the Project site. Through compliance with the application and permitting process and changed zoning requirements, the Project would be consistent with the LAMC.

#### Walkability Checklist

The *Walkability Checklist* includes recommendations in the form of strategies to implement the *General Plan's* policies regarding the creation of inviting pedestrian-oriented neighborhoods, encouraging community interaction, and decreasing unnecessary automobile use. Table IV.G-6 contains a discussion of the Project's consistency with the applicable strategies of the *Walkability Checklist*. As discussed, the Project would be consistent with all of the applicable strategies of the *Walkability Checklist*.

**Table IV.G-6**  
**Project Consistency with the Applicable Strategies of the *Walkability Checklist***

Implementation Strategies	Consistency
<b>Sidewalks</b>	
1. Create a continuous and predominantly straight sidewalk and open space.	<b>Consistent:</b> The sidewalks adjacent to the Project site are continuous and straight. Any reconstruction of sidewalks that could be required of the Project Applicant by the City would be done in accordance with the City's standards for sidewalks.
2. Create a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting).	<b>Consistent:</b> The subterranean parking garage would be the only area associated with the Project where vehicles and pedestrians would interact. Pedestrian walkways to/from the elevator and stairwells would be provided. Although landscaping would be incorporated around the Project driveway, the width and sight distance of (and from) the driveway would allow for pedestrians and vehicle drivers to see and avoid one another.
3. Provide adequate sidewalk width that accommodates pedestrian flow and activity yet is not wider than necessary.	<b>Consistent:</b> Any reconstruction of sidewalks that could be required of the Project Applicant by the City would be done in accordance with the City's standards for sidewalks.
4. Utilize street furnishings to create a consistent rhythm (i.e., consistent height of light poles or consistent shade pattern of trees).	<b>Consistent:</b> Any street trees that are required would be planted in accordance with City standards for street trees.

**Table IV.G-6**  
**Project Consistency with the Applicable Strategies of the *Walkability Checklist***

<b>Implementation Strategies</b>	<b>Consistency</b>
5. Incorporate closely planted shade-producing street trees. They may be interspersed with existing or proposed palms.	<b>Consistent:</b> Any street trees that are required would be planted in accordance with City standards for street trees.
<b>Utilities</b>	
1. Place utilities underground whenever possible.	<b>Consistent:</b> All Project utilities would be placed underground.
2. Place utilities in the landscape areas and away from crosswalks or sidewalks.	<b>Consistent:</b> None of the Project utilities would be placed within sidewalk areas.
3. Buffer equipment with planting in a manner that contributes to the quality of the public streetscape.	<b>Consistent:</b> All of the Project “equipment,” such as the heating, ventilation, and air conditioning (HVAC) equipment, would be placed on the roof of the structure and screened as required by the City. No equipment would be located at ground level.
4. Eliminate conflicts between utilities and access to building entrances.	<b>Consistent.</b> No utility infrastructure (wires, poles, transformers) would be located near any of the building access points.
<b>Building Orientation</b>	
1. Design grade-level entrances from the public right-of-way for pedestrians.	<b>Consistent:</b> Primary residential access to the proposed structures would occur at grade level along the roadways (Oak Street, 20 <sup>th</sup> Street, and Washington Boulevard) adjacent to the Project site.
2. Create primary entrances for pedestrians that are easily accessible from transit stops, with as direct a path as possible to the transit stop.	<b>Consistent.</b> The primary pedestrian access points associated with the Project would have access to sidewalks along 20 <sup>th</sup> Street, Oak Street, and Washington Boulevard and would allow access to the transit stop near the corner of Washington Street and Oak Street, adjacent to the Project site.
3. Make primary entrances to buildings visible from the street and sidewalk.	<b>Consistent:</b> Primary residential access to the proposed structures would occur along the roadways (Oak Street, 20 <sup>th</sup> Street, and Washington Boulevard) adjacent to the Project site. All entrances would be visible from these streets and from the sidewalk adjacent to the Project site.
5. Incorporate transitions from the sidewalk to the front door such as grade separation, landscaping, and/or porches at individual entrances to residences. These methods should not negatively impact the overall street wall.	<b>Consistent.</b> Landscaping and architectural features (such as stairs, railings, windows) would be used to provide transitions from the sidewalk to the pedestrian entrances.
6. Comply with Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances. Alternate approaches for persons with mobility limitations (such as a ramp next to the main path to the primary entry) should not be necessary.	<b>Consistent:</b> Design and construction of the Project would comply with the ADA guidelines.

**Table IV.G-6**  
**Project Consistency with the Applicable Strategies of the *Walkability Checklist***

<b>Implementation Strategies</b>	<b>Consistency</b>
7. Incorporate passageways or paseos into mid-block developments, particularly on long blocks, that facilitate pedestrian movement through the depth of the block to the front of the next parallel block. Pedestrians need not walk the circumference of a block in order to access the middle of the next parallel block or alley or parking behind the block.	<b>Consistent.</b> The Project would provide passageways throughout the Project for Project residents and visitors to move from one portion of the Project to the other and to adjacent sidewalks and streets.
8. Activate mid-block passageways or paseos so that they are visually interesting and safe spaces.	<b>Consistent.</b> The Project would provide passageways throughout the Project for Project residents and visitors to move from one portion of the Project to the other and to adjacent sidewalks and streets. These passageways would include appropriate lighting and signage.
9. Provide direct access to building entrances from sidewalks and streets.	<b>Consistent:</b> Primary residential access to the proposed structures would occur along the roadways (Oak Street, 20 <sup>th</sup> Street, and Washington Boulevard) adjacent to the Project site.
<b>Off-Street Parking and Driveways</b>	<b>Consistent:</b> Any reconstruction of sidewalks that could be required of the Project Applicant by the City would be done in accordance with the City's standards for sidewalks.
1. Maintain continuity of the sidewalk.	<b>Consistent:</b> The Project includes subterranean parking, and no parking would be visible from local roadways.
2. Locate parking behind buildings rather than directly exposed to the adjacent major street.	<b>Consistent:</b> Access to the Project site would be provided on Oak Street and in compliance with the Los Angeles Department of Transportation (LADOT) requirements.
3. Use alleys to access the parking behind the building. If no alley is available, create access to parking from a side street, wherever possible.	<b>Consistent:</b> The Project includes one vehicular access point (ingress/egress).
4. Accommodate vehicle access to and from the site with as few driveways as possible.	<b>Consistent:</b> The design and construction of the Project's driveway would comply with the City's standards for driveways.
5. Limit the width of each driveway to the minimum required.	<b>Consistent:</b> The Project does not include a front setback. Thus, no parking within this area could occur.
7. Limit parking in the front setback of the building to within allowed driveways.	<b>Consistent:</b> All Project lighting would comply with the City's standards for lighting.
9. Illuminate all parking areas and pedestrian walkways.	
<b>On-Site Landscaping</b>	<b>Consistent:</b> All Project landscaping would comply with the City's requirements for landscaping and street trees.
1. Provide canopy trees in planting areas in addition to the street trees.	<b>Consistent:</b> All Project landscaping would comply with the City's requirements for landscaping and street trees.
2. Provide planting that complements pedestrian movement or views.	<b>Consistent:</b> All Project landscaping would comply with the City's requirements for landscaping and street trees.
3. Provide planting that complements the character of the built environment.	<b>Consistent:</b> All Project landscaping would comply with the City's requirements for landscaping and street trees.
<b>Building Façade</b>	<b>Consistent:</b> The Project includes a variety of architectural features (refer to Figures III-3 through III-5 in Section III [Project Description]). Rooflines are varied, colors and building materials are used to define the building design elements and highlight distinctive architectural features. Massing is varied throughout the Project site.
1. Incorporate different textures, colors, materials, and distinctive architectural features that add visual interest.	

**Table IV.G-6**  
**Project Consistency with the Applicable Strategies of the *Walkability Checklist***

<b>Implementation Strategies</b>	<b>Consistency</b>
2. Add scale and interest to the building facade by articulated massing.	<b>Consistent:</b> The proposed structure would have articulated massing (refer to Figures III-3 through III-5 in Section III [Project Description]).
4. Discourage blank walls. Architectural features, enhanced materials, fenestration, planting, lighting, and signage may contribute to a more pedestrian friendly streetscape.	<b>Consistent:</b> The Project does not include any blank walls and would incorporate architectural features, landscaping, lighting, and signage to promote a pedestrian-friendly streetscape along the Project site boundary (refer to Figures III-3 through III-5 in Section III [Project Description]).
5. Include overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain.	<b>Consistent:</b> The Project would include awnings, landscaping, and balconies to provide shade.
6. Contribute to neighborhood safety by providing windows at the street that act as “eyes on the street.”	<b>Consistent.</b> The Project would have windows that would face out toward the street, allowing residents to see outside of the Project site area.
<b>Building Signage and Lighting</b>	<b>Consistent:</b> The Project would provide pedestrian-oriented signage, and all Project signage would comply with City standards for signage.
1. Include signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance.	
2. Provide adequate lighting levels to safely light the pedestrian path.	<b>Consistent:</b> The Project would provide security lighting, and all Project lighting would comply with City standards for lighting.
3. Utilize adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage.	<b>Consistent:</b> The location of Project lighting and the types of lighting provided would comply with City standards for lighting.
4. Use fixtures that are “dark sky” compliant.	<b>Consistent:</b> Project lighting would comply with City standards for lighting and would not have any lighting directed toward the sky.
<i>Source: Walkability Checklist, City of Los Angeles, November 2008.</i>	

### Citywide Design Guidelines

Table IV.G-7 contains a discussion of the Project’s consistency with the applicable guidelines of the *Citywide Design Guidelines*. As discussed, the Project would be consistent with all of the applicable guidelines of the *Citywide Design Guidelines*.



**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
<b>Site Planning</b>	
1. Work with the natural topography of the site to avoid dramatic and unnecessary grade changes by utilizing landform grading.	<b>Consistent:</b> The sidewalks adjacent to the Project site are continuous and straight. Any reconstruction of sidewalks that could be required of the Project Applicant by the City would be done in accordance with the City's standards for sidewalks.
3. Create a strong street wall by locating building frontages at the front property line where no setback requirement exists, or at the required setback. Where additional setback is necessary or a prevailing setback exists, activate the area with a courtyard or "outdoor room" adjacent to the street by incorporating residential amenities such as seating or water features, for example.	<b>Consistent.</b> All Project buildings would be constructed at the LAMC-required setbacks for the site and would abut various courtyards.
5. Locate a majority of code-required open space at the ground level in a manner that is equally accessible to all residential units to promote safety and the use of outdoor areas. In mid- and high-rise buildings, podiums between buildings and rooftop areas can be used as common areas.	<b>Consistent.</b> The Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space, consisting of private patios and balconies, a total of 35,163 square feet of open space, exceeding the LAMC standard by 11,913 square feet. Most of the Project's open space would be provided at ground level.
7. Provide direct paths of travel for pedestrian destinations within large developments. Especially near transit lines, create primary entrances for pedestrians that are safe, easily accessible, and a short distance from transit stops.	<b>Consistent.</b> The primary pedestrian access points associated with the Project would have access to sidewalks along 20 <sup>th</sup> Street, Oak Street, and Washington Boulevard and would allow access to the transit stop near the corner of Washington Street and Oak Street, adjacent to the Project site.
10. Install bicycle racks and lockers near building entrances, especially in residential or mixed-use projects located on Major or Secondary highways, or on Local and Collector streets near commercial services. Ensure bicycle racks are placed in a safe, well-lit location, convenient for residents and visitors.	<b>Consistent.</b> The Project would be required to provide long-term and short-term bicycle parking in compliance with the City's Bicycle Parking Ordinance (147 long-term spaces and 10 short-term spaces).
<b>Building Orientation</b>	
1. Design small lot subdivisions, low-rise townhomes and apartment buildings to ensure that all street-fronting units have a primary entrance facing the street. Alternatively, for Medium and High-Medium density buildings without ground floor entrances for individual units, create a prominent ground or first floor entry, such as a highly visible lobby or atrium.	<b>Consistent:</b> Primary residential access to the proposed structures would occur at grade level along the roadways (Oak Street, 20 <sup>th</sup> Street, and Washington Boulevard) adjacent to the Project site.
2. Locate gathering spaces such as gyms, recreation rooms, and community space at the ground level and accessible to the street.	<b>Consistent.</b> A community room would be located at ground level, accessible from Oak Street. A common outdoor living area and a recreation room would be located at ground level and accessible from the interior of the Project and from the sidewalk located along the southwestern portion of the Project site.

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
<b>Entrances</b> <ol style="list-style-type: none"> <li>1. Incorporate transitions such as landscaping, paving, porches, stoops, and canopies at individual entrances to residences, from the sidewalk to the front door. These methods should not protrude into required yards or negatively impact the overall street wall.</li> <li>2. Entries should be designed according to simple and harmonious proportions in relationship to the overall size and scale of the building. Design entries in proportion to the number of units being accessed and ensure that pedestrian entries are sized properly to provide shelter year-round.</li> <li>3. Ensure that the main entrance and entry approach can accommodate persons of all mobility levels.</li> <li>4. Promote pedestrian activity by placing entrances at grade level or slightly above, and unobstructed from view from the public right-of-way. Entryways below street level should be avoided.</li> <li>5. If stairs are used in common areas, such as an atrium or lobby, they should be highly visible and integrated with the predominant architectural design elements of the main building.</li> </ol>	<p><b>Consistent.</b> Landscaping and architectural features (such as stairs, railings, windows) would be used to provide transitions from the sidewalk to the pedestrian entrances.</p> <p><b>Consistent:</b> All entry points associated with the project would be pedestrian sized. The Project includes lobbies and canopies to provide protection from weather conditions.</p> <p><b>Consistent:</b> Design and construction of the Project would comply with the ADA guidelines.</p> <p><b>Consistent:</b> Primary residential access to the proposed structures would occur at grade level along the roadways (Oak Street, 20<sup>th</sup> Street, and Washington Boulevard) adjacent to the Project site.</p> <p><b>Consistent.</b> The Project would use varying floor textures, paint, signage, and railing to ensure stairways are visible.</p>
<b>Relationship to Adjacent Buildings</b> <ol style="list-style-type: none"> <li>1. Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood. In older neighborhoods, new developments should likewise respect the character of existing buildings with regards to height, scale, style, and architectural materials.</li> <li>2. For RD1.5, RD2, R3, R4, RAS3, and RAS4 developments, apply additional setbacks in side and rear yards abutting single-family and/or R2 zoned lots.</li> <li>3. Where multi-family projects are adjacent to single-family zones, provide a sensitive transition by maintaining a height compatible with adjacent buildings. Mitigate negative shade/shadow and privacy impacts by stepping back upper floors and avoiding direct views into neighboring single-family yards.</li> <li>4. When designing small lot subdivisions or projects built over two or more lots, provide sufficient space between buildings, articulation along the street frontage, and visual breaks to diminish the scale and massing.</li> </ol>	<p><b>Consistent.</b> As discussed in Section IV.B (Aesthetics), the Project's height, scale, style, and architecture would be compatible with the visual character of the surrounding neighborhood.</p> <p><b>Consistent:</b> All Project buildings would be constructed at the LAMC-required setbacks for the site.</p> <p><b>Consistent.</b> As discussed in Section IV.B (Aesthetics), the Project's height, scale, style, and architecture would be compatible with the visual character of the surrounding neighborhood, including the single-family residential land uses in the Project site area.</p> <p><b>Consistent.</b> As shown on Figures III-3 and Figure III-5 in Section III (Project Description), space would be provided between the buildings along Washington Boulevard and Oak Street. Additionally, as shown on Figure III-4, the Project building on 20<sup>th</sup> Street would</p>

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
5. Plant trees, shrubs, and vines to screen walls between property lines. Use decorative walls that include a change in color, material, and texture.	include articulation and varying architectural features to break up the scale and massing of the building. <b>Consistent.</b> All walls developed as part of the Project would be planted with landscaping.
<b>Building Façade</b>	
1. Add architectural details to enhance scale and interest on the building facade by breaking it up into distinct planes that are offset from the main building façade. Porches and stoops can be used to orient housing towards the street and promote active and interesting neighborhood streetscapes.	<b>Consistent:</b> The Project includes a variety of architectural features (refer to Figures III-3 through III-5 in Section III [Project Description]). Rooflines are varied, colors and building materials are used to define the building design elements and highlight distinctive architectural features. Massing is varied throughout the Project site.
2. Design multi-family buildings to convey individual residential uses, even when applying a modern aesthetic. Modulated façades can prevent residential buildings from appearing commercial.	<b>Consistent:</b> The proposed structure would have articulated massing (refer to Figures III-3 through III-5 in Section III [Project Description]).
3. Layer building architectural features to emphasize certain features of the building such as entries, corners, and organization of units.	<b>Consistent:</b> The Project does not include any blank walls and would incorporate architectural features, landscaping, lighting, and signage to promote a pedestrian-friendly streetscape along the Project site boundary (refer to Figures III-3 through III-5 in Section III [Project Description]).
4. Alternate different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades.	<b>Consistent:</b> The Project would include awnings, landscaping, and balconies to provide shade.  <b>Consistent.</b> The Project would have windows that would face out toward the street, allowing residents to see outside of the Project site area.
5. Utilize windows and doors as character-defining features to reflect an architectural style or theme consistent with other façade elements. Windows should project or be inset from the exterior building wall and incorporate well-designed trims and details.	<b>Consistent.</b> The windows, doors, and trim associated with the Project would be a residential architectural style to help reflect the proposed land uses.
6. Treat all façades of the building with an equal level of detail, articulation, and architectural rigor.	<b>Consistent.</b> As shown on Figures III-3, III-4, and III-5 in Section III (Project Description), all façades of the proposed buildings would exhibit an equal level of detail, articulation, and architectural rigor.
7. Integrate varied rooflines through the use of sloping roofs, modulated building heights, gables, dormers, or innovative architectural solutions.	<b>Consistent.</b> As shown on Figures III-3, III-4, and III-5 in Section III (Project Description), the rooflines of the proposed buildings would vary.
8. Reinforce existing facade rhythm along the street where it exists by using architectural elements such as trim, material changes, paved walkways, and other design treatments consistent with surrounding buildings.	<b>Consistent.</b> As shown on Figures III-3, III-4, and III-5 in Section III (Project Description), architecture and building materials associated with the Project would reflect the proposed residential land uses and the residential land uses in the Project area. Additionally, as discussed in Section IV.B (Aesthetics), the Project would be compatible with the visual character of the surrounding neighborhood.

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

<b>Guidelines</b>	<b>Consistency</b>
9. Include overhead architectural features such as eaves, awnings, canopies, trellises, or cornice treatments at entrances and windows that provide shade, provide passive cooling, and reduce daytime heat gain.	<b>Consistent.</b> The Project would include various architectural treatments and features to provide shade.
10. Orient windows on street facing units toward public streets, rather than inward, to contribute to neighborhood safety and provide design interest.	<b>Consistent.</b> As shown on Figures III-3, III-4, and III-5 in Section III (Project Description), the Project includes windows that would face out from the Project toward the streets.
11. Orient interior unit spaces so that larger windows for more public rooms, such as living and dining areas, face onto the street.	<b>Consistent.</b> Some of the windows associated with the Project that would face onto the surrounding streets would be those of the dining and living areas.
12. Design balconies such that their size and location maximize their intended use for open space. Avoid “tacked on” balconies with limited purpose or function.	<b>Consistent.</b> The Project would provide balconies and other open space in compliance with LAMC requirements.
<b>Sidewalks</b>	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design, landscaping, and lighting.
1. For new multi-family residential projects where a sidewalk does not currently exist, establish a new sidewalk along the length of the public street frontage.	
2. On Major and Secondary Highways, provide a comfortable sidewalk and parkway width — generally 10-15 feet — that can accommodate pedestrian flow and activity, but is not wider than necessary. Sidewalks and parkway widths on Local and Collector streets may be narrower, but generally not less than nine feet wide.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design, landscaping, and lighting.
3. Create continuous and predominantly straight sidewalks and open space. Reconstruct abandoned driveways as sidewalks.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design, landscaping, and lighting.
4. Plant parkways separating the curb from the sidewalk with ground cover, low-growing vegetation or permeable materials that accommodate both pedestrian movement and the use of car doors. Brick work, pavers, gravel, and wood chips are examples of suitable permeable materials.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design, landscaping, and lighting.
5. Create a buffer zone between pedestrians, moving vehicles, and other transit modes by the use of landscape and street furniture. Examples include street trees, benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design, landscaping, and lighting.
6. Plant street trees at the minimum spacing permitted by the Division of Urban Forestry, typically one tree for every 20 feet of street frontage, to create a consistent rhythm. Broad-leaf evergreen and	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City’s requirements for sidewalk size, design,

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
deciduous trees should be used to maintain a continuous tree canopy. Shade producing street trees may be interspersed with an occasional non-shade tree. In high pedestrian use areas, install tree guards to protect tree trunks from damage.	landscaping, and lighting.
7. Provide lights on sidewalks to encourage and extend safe pedestrian activities into the evening.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City's requirements for sidewalk size, design, landscaping, and lighting.
8. Utilize pedestrian lighting, seating areas, special paving, or landscaping. Ensure that new developments adjacent to transit stops invest in pedestrians amenities such as trash receptacles and sheltered benches or seating areas for pedestrian that do not intrude into the accessible route.	<b>Consistent.</b> The existing sidewalk around the perimeter of the Project site would be removed and replaced/improved as part of the Project in compliance with the City's requirements for sidewalk size, design, landscaping, and lighting.
<b>Off-Street Parking and Driveways</b>	<b>Consistent.</b> The Project includes subterranean parking and only one driveway (on Oak Street).
1. Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.	
2. Maintain continuity of the sidewalk by minimizing the number of curb cuts for driveways and utilizing alleys for ingress and egress.	<b>Consistent.</b> The Project includes only one driveway (on Oak Street).
8. Illuminate all parking areas and pedestrian walkways to improve safety. Avoid unintended spillover impacts onto adjacent properties.	<b>Consistent.</b> Lighting would be provided within the subterranean parking area. In addition, the Project proposes a variety of lighting design features that comply with the LAMC to minimize the effect of the new sources of lighting that would be introduced.
9. Where openings occur due to driveways or other breaks in the sidewalk or building wall, use architectural features such as decorative gates and pergolas in combination with landscaping to provide a continuous visual presence at the street level.	<b>Consistent.</b> As shown on Figure III-5 in Section III (Project Description), breaks in the buildings would be decorated with landscaped walls.
<b>On-Site Landscaping</b>	
1. Retain mature and healthy vegetation and trees when developing the site.	<b>Consistent.</b> Eleven mature Indian Laurel Fig street trees ( <i>Ficus microcarpa nitida</i> ) are located within the sidewalk area just outside of the Project site. The trees have put out horizontal roots that have damaged adjacent sidewalks. As part of site preparation, the City likely would require the Applicant to remove and replace the trees in accordance with the Bureau of Street Trees requirements.
2. Design landscaping to be architecturally integrated with the building and suitable to the functions of the space while selecting plant materials that complement the architectural style and form of the	<b>Consistent.</b> The Project would incorporate appropriate landscaping for a multi-family residential land use.

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
building.	
3. Design open areas to maintain a balance of landscaping and paved area.	<b>Consistent.</b> The Project would be required to meet the City's standards for landscaping (refer to Figures III-6A and III-6B in Section III [Project Description]).
4. Select drought tolerant, native landscaping to limit irrigation needs and conserve water. Mediterranean and other local climate-friendly plants may be used alongside native species.	<b>Consistent.</b> The Project would be required to meet the City's standards for landscaping, including use of drought tolerant, native plants (refer to Figures III-6A and III-6B in Section III [Project Description]).
5. Facilitate sustainable water use by using automated watering systems and drip irrigation to water landscaped areas.	<b>Consistent.</b> The Project would use an automated watering systems and drip irrigation to water landscaped areas.
6. Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape irrigation.	<b>Consistent.</b> In accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Stormwater pollution control measures could include use of permeable or porous paving materials and reuse of stormwater for landscape irrigation.
7. In addition to street trees, provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing façades.	<b>Consistent.</b> The Project would be required to meet the City's standards for landscaping, including the use of shade trees (refer to Figures III-6A and III-6B in Section III [Project Description]).
<b>Open Space and Recreation Activities</b>	<b>Consistent.</b> The Project would be required to meet the City's standards for landscaping (refer to Figures III-6A and III-6B in Section III [Project Description]).
1. Activate all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities with landscaping. Landscaping may include any practicable combination of shrubs, trees, ground cover, minimal lawns, planter boxes, flowers, or fountains that reduce dust and other pollutants and promote outdoor activities, especially for children and seniors.	
2. For buildings with six units or more, cluster code-required common open space areas in a central location, rather than dispersing smaller less usable areas throughout the site.	<b>Consistent.</b> Based on LAMC open space standards, the Project would be required to include a minimum of 23,250 square feet of open space. The Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space, consisting of private patios and balconies, a total of 35,163 square feet of open space, exceeding the LAMC standard by 11,913 square feet.
3. Provide balconies to augment, rather than substitute for, actively used common open spaces and recreational areas.	<b>Consistent.</b> Based on LAMC open space standards, the Project would be required to include a minimum of 23,250 square feet of open space. The Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space, consisting of private patios and balconies, a total of 35,163 square feet of open space, exceeding the LAMC standard by 11,913 square feet.

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

<b>Guidelines</b>	<b>Consistency</b>
4. Provide common amenities such as community gardens and tot lots.	<b>Consistent.</b> Based on LAMC open space standards, the Project would be required to include a minimum of 23,250 square feet of open space. The Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space, consisting of private patios and balconies, a total of 35,163 square feet of open space, exceeding the LAMC standard by 11,913 square feet.
<b>Building Signage</b>	<b>Consistent.</b> The Project would meet all signage requirements established by the City.
1. Place signs so they do not dominate or obscure the architectural elements of the building design.	
2. Include signage at a height and of a size that is visible to pedestrians and facilitates access to the building entrance. In residential-only buildings, permanent signs affixed to the building solely for the purpose of communicating the name of a business or entity, or for advertising rentals are inappropriate in residential areas.	<b>Consistent.</b> The Project would meet all signage requirements established by the City.
<b>Lighting and Security</b>	<b>Consistent:</b> The Project would provide security lighting, and all Project lighting would comply with City standards for lighting.
1. Use ornamental low-level lighting to highlight and provide security for pedestrian paths and entrances. Ensure that all parking areas and pedestrian walkways are illuminated.	
2. Install lighting fixtures to accent and complement architectural details at night to establish a façade pattern and animate a building's architectural features.	<b>Consistent:</b> The Project would provide security lighting, and all Project lighting would comply with City standards for lighting.
3. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage.	<b>Consistent:</b> The Project would provide security lighting, and all Project lighting would comply with City standards for lighting.
<b>Utilities</b>	<b>Consistent.</b> All utilities associated with the Project would be placed underground and/or buffered pursuant to LAMC requirements.
1. Place utilities such as gas, electric, and water meters in side yard setbacks or in landscaped areas and out of the line-of-sight from crosswalks or sidewalks. Utilities such as power lines, transformers, and wireless facilities should be placed underground or on rooftops when appropriately screened by a parapet. Otherwise, any mechanical or electrical equipment should be buffered by planting materials in a manner that contributes to the quality of the existing landscaping on the property and the public streetscape.	
2. Screen rooftop equipment such as air conditioning units, antennas and communication equipment, mechanical equipment, and vents from the public right-of-way.	<b>Consistent.</b> Pursuant to LAMC requirements, all utility and mechanical equipment would be screened.
3. Hide trash enclosures within parking garages so that	<b>Consistent.</b> Pursuant to LAMC requirements, all trash

**Table IV.G-7**  
**Project Consistency with the Applicable Guidelines of the *Citywide Design Guidelines***

Guidelines	Consistency
they are not visible to passersby. Screen outdoor stand alone trash enclosures using walls consistent with the architectural character of the main building and locate them so that they are out of the line-of-sight from crosswalks or sidewalks.	areas would be enclosed.
4. Locate noise and odor-generating functions in enclosed structures so as not to create a nuisance for building residents or adjacent neighbors.	<b>Consistent.</b> Pursuant to LAMC requirements, all utility and mechanical equipment would be screened, and all trash areas would be enclosed.
<i>Source: Citywide Design Guidelines, City of Los Angeles, June 2011.</i>	

*North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay District (NSO)*  
*(Ordinance 180218)*

As stated previously, the purposes of the NSO District are as follows:

1. Promote well-planned housing to meet the needs of college/university student housing, and the needs of the community.
2. Address impacts of multiple-habitable room projects, which may be incompatible with surrounding development.
3. Encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects.
4. Ensure that the Project provides adequate on-site parking.
5. Address a concentration of campus-serving housing in the vicinity.

The Project would include 142 multi-family residential dwelling units, including 11 very-low-income units, in an area that is in need of housing. Additionally, as discussed in Section IV.B (Aesthetics) and IV.D (Cultural Resources), the Project would be compatible with the character of the surrounding land uses. Further, as discussed in Section IV.K (Transportation/Traffic), the Project would meet the LAMC requirements for parking. For these reasons, the Project would be consistent with the NSO District.

## CUMULATIVE IMPACTS

Table II-1 in Section II (Environmental Setting) shows the related projects that are located in the City and the associated zoning and land use designations. As shown on the table, for most of the related projects, the land uses proposed are consistent with the zoning and land use designation for related projects' sites. Because of this consistency, it is reasonable to assume that the land uses under these related projects have been considered in the long-term planning efforts for the region, and thus are consistent with applicable plans, policies, and regulations, similar to those described in this section. Inconsistency with zoning and



a land use designation does not necessarily mean that the proposed land uses are inconsistent with applicable plans, policies, and regulations. The degree to which these related projects are or are not consistent with applicable plans, policies, and regulations is unknown. However, the City's decision-making bodies will consider the consistency of the related projects in the project approval/denial process and will make the ultimate determination of whether these related projects are consistent or not. Regardless, as discussed previously, the proposed Project would be consistent with all applicable plans, policies, and regulations, and would not have the potential to contribute to any impacts related to land use and planning inconsistencies. Therefore, cumulative impacts related to land use and planning would be less than significant.

### **MITIGATION MEASURES**

No significant impacts related to land use planning have been identified, and no mitigation measures are required.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to land use planning would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### H. NOISE

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#### ENVIRONMENTAL SETTING

##### Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. Table IV.H-1 illustrates representative noise levels in the environment.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Rating scales that are applicable to this analysis are as follows:

- $L_{eq}$  – A  $L_{eq}$ , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the  $L_{eq}$  of a time-varying noise and that of a steady noise are the same if the noises deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- $L_{max}$  – The maximum instantaneous noise level experienced during a given period of time.
- $L_{min}$  – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average  $L_{eq}$  with a 5 dBA “weighting” during the hours of 7:00 PM to 10:00 PM and a 10 dBA “weighting” added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour  $L_{eq}$  would result in a measurement of 66.7 dBA CNEL.

**Table IV.H-1  
Representative Environmental Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing
<i>Source: California Department of Transportation, Technical Noise Supplement, October 1998.</i>		

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss (depending on exposure). Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA).

It is widely accepted that in the community noise environment, the average healthy ear can barely perceive CNEL noise level changes of 3 dBA or less. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, can also help intensify or reduce the noise level at

any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.<sup>1</sup>

### **Fundamentals of Environmental Groundborne Vibration**

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

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

The general human response to different levels of groundborne vibration velocity levels is described on Table IV.H-2.

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<sup>1</sup> *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

**Table IV.H-2**  
**Human Response to Different Levels of Ground-Borne Noise and Vibration**

Vibration Velocity Level	Noise Level		Human Reaction
	Low Freq <sup>1</sup>	Mid Freq <sup>2</sup>	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound usually inaudible, mid-frequency sound excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise acceptable for sleeping areas, mid-frequency noise annoying in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events per day. Low-frequency noise annoying for sleeping areas, mid-frequency noise annoying even for infrequent events with institutional land uses such as schools and churches.
<i>Notes:</i> <sup>1</sup> Approximate noise level when vibration spectrum peak is near 30 Hz. <sup>2</sup> Approximate noise level when vibration spectrum peak is near 60 Hz. <i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.</i>			

## Existing Conditions

### *Existing Ambient Daytime Noise Levels*

The Project site is located in a highly developed urban area in the South Los Angeles Community Plan Area within the City of Los Angeles, and is generally bounded to the north by Washington Boulevard, to the east by Oak Street, to the south by 20<sup>th</sup> Street, and to the west by a commercial building and surface parking lot. Existing uses on the Project site include a one-story commercial catering facility and an associated surface parking lot.

General land uses in the Project vicinity consists of a mix of urban development, including commercial, institutional (i.e. school), and residential uses as well as surface parking lots. On the property to the east of the Project site, across Oak Street, is a surface parking lot and Norwood Street Elementary School. The property to the west of the Project site is developed with a one-story commercial building. To the south, across 20<sup>th</sup> Street, is a residential neighborhood that primarily consists of small two-story single- and multi-family residences. To the north of the Project site, across Washington Boulevard, is an unoccupied two-story church, a four-story commercial building, and associated surface parking lots. Further north of the Project site, along Oak Street, is the historic six-story Casa Camino Real Building.

To establish baseline noise conditions at nearby sensitive receptors within the vicinity of the Project site, existing daytime noise levels were monitored at surrounding off-site locations where existing sensitive receptors are located, which includes the residential uses to the south of the Project site, across 20<sup>th</sup> Street,

and the Norwood Street Elementary School to the east of the Project site, across oak Street. The noise survey was conducted using the Larson-Davis 831 precision noise meter, which meets and exceeds the minimum industry standard performance requirements for “Type 1” standard instruments as defined in the American National Standard Institute (ANSI) S1.4. Furthermore, this noise meter meets and exceeds the requirement specified in Section 111.01(l) of the City of Los Angeles Municipal Code (LAMC) that the instruments be “Type S2A” standard instruments or better. This instrument was calibrated and operated according to the manufacturer’s written specifications. At the measurement site, the microphone was placed at a height of approximately five feet above the local grade.

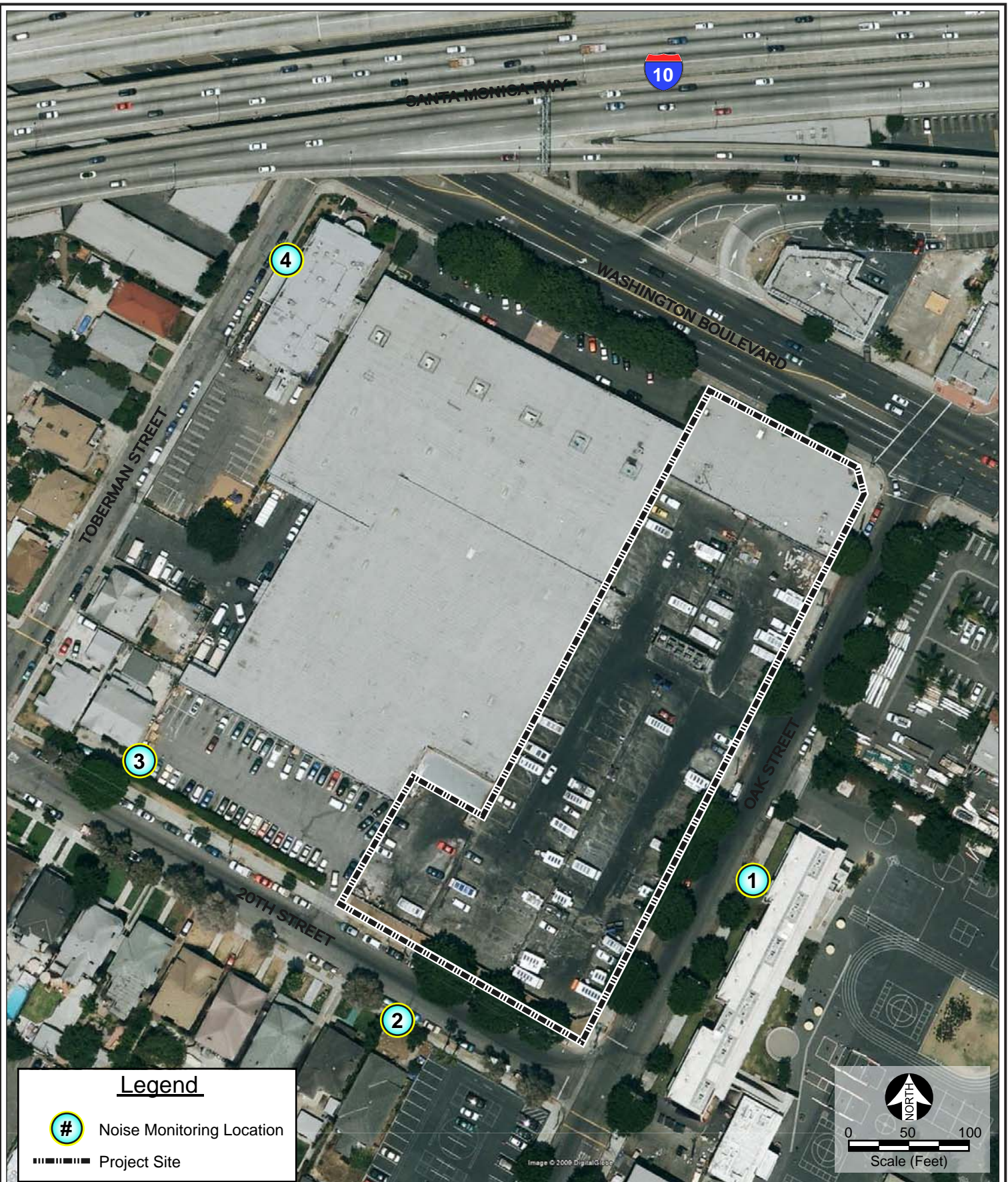
At the noise measurement locations, listed on Table IV.H-3, the sound level meter was programmed to record the average sound level ( $L_{eq}$ ) over a cumulative period of 15 minutes, in accordance with Section 111.01(a) of the LAMC. Noise measurements were taken at the nearest sensitive receptors on each side of the Project boundary to identify the representative noise levels at these sensitive receptors. The average noise levels and sources of noise monitored at these locations are shown on Table IV.H-3, with the locations identified on Figure IV.H-1.

**Table IV.H-3**  
**Existing Daytime Noise Levels at Sensitive Off-site Locations**

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics		
		$L_{eq}$	$L_{min}$	$L_{max}$
1. Norwood Street Elementary School located east of the Project site.	Diesel truck engines from Project site; traffic on Oak Street; airplane overhead.	60.5	56.5	73.8
2. Single-family residence located south of Project site.	Vehicles driving through 20 <sup>th</sup> Street; radio noise from repair van at a distance; small power tool operating across street.	57.1	51.5	75.6
3. Single-family residence located west of Project site.	Residents talking outside of house; vehicles driving through 20 <sup>th</sup> Street; workers talking on adjacent commercial property.	56.2	49.2	71.1
4. Downtown Value School located west of the Project site, at the southeastern corner of Washington Boulevard and Toberman Street.	Traffic on Washington Boulevard and the I-10 Freeway overpass.	66.4	53.3	78.1
Source: CAJA, 2010. Noise measurement data are provided in Appendix IV.H.				

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### ***Existing Roadway Noise Levels Offsite***

Existing roadway noise levels were calculated for 11 roadway segments located in proximity of the Project site. The roadway segments selected for analysis are considered to be those that could be most affected by Project-related traffic, which, for the purpose of this analysis, includes the roadways that are nearest to the Project site. These roadways, when compared to roadways located further away from the Project site, would experience the greatest percentage increase in traffic generated by the Project.

Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Project traffic analysis. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table IV.H-4.<sup>2</sup>

### ***Existing Groundborne Vibration Levels***

The only sources of groundborne vibration in the Project site vicinity are heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road.<sup>3</sup> In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

## **Regulatory Framework**

### ***Federal***

#### ***Noise Standards***

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

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<sup>2</sup> Table IV.H-4 indicates noise levels at 50 feet from the centerline of each roadway segment.

<sup>3</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

**Table IV.H-4  
Existing Roadway Noise Levels Offsite**

<b>Roadway</b>	<b>Roadway Segment</b>	<b>Existing Land Uses Located Along Roadway Segment</b>	<b>dBA CNEL <sup>a</sup></b>
Washington Boulevard	East of Oak Street	Commercial	70.4
	Between Oak Street and Toberman Street	Commercial	70.4
	Between Toberman Street and Union Street	Commercial	70.7
18 <sup>th</sup> Street	Between Toberman Street and Union Avenue	Residential	53.4
23 <sup>rd</sup> Street	East of Oak Street	Residential	63.4
	Between Toberman Street and Oak Street	Residential	63.4
	Between Union Avenue and Toberman Street	Residential	62.9
Oak Street	North of Washington Boulevard	Residential & Commercial	48.9
	South of Washington Boulevard	School	55.2
Union Avenue	Between 18 <sup>th</sup> Street and Washington Boulevard	Residential & Commercial	63.1
	South of Washington Boulevard	Residential & Commercial	61.5
<sup>a</sup> Values represent noise levels at 50 feet from the centerline of each roadway. Traffic Information Source: Linscott Law & Greenspan, Engineers, Traffic Impact Study, Oak Village Residences Project, July 14, 2009; and Supplemental Traffic Analysis August 2, 2012. Table Source: Parker Environmental Consultants, September 2012. Calculation data and results provided in Appendix IV.H.			

### *Vibration Standards*

The Federal Transit Administration (FTA) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown on Table IV.H-5.

**Table IV.H-5  
Construction Vibration Damage Criteria**

<b>Building Category</b>	<b>PPV (in/sec)</b>
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.	

In addition, the FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories: (1) Vibration Category 1 – High Sensitivity, (2) Vibration Category 2 – Residential, and (3) Vibration Category 3 – Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

Under conditions where there are an infrequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 80 VdB for Category 2 buildings, and 83 VdB for Category 3 buildings.<sup>4</sup> Under conditions where there are an occasional number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 75 VdB for Category 2 buildings, and 78 VdB for Category 3 buildings.<sup>5</sup> No thresholds have been adopted or recommended for commercial and office uses.

## ***State***

### *Noise Standards*

The California Department of Health Services has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown on Table IV.H-6. In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

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<sup>4</sup> “Infrequent events” is defined by the Federal Transit Administration as being fewer than 30 vibration events of the same kind per day. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

<sup>5</sup> “Occasional events” is defined by the Federal Transit Administration as between 30 and 70 vibration events of the same source per day. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

**Table IV.H-6  
Guidelines for Noise Compatible Land Use**

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N
<p><i>A = Normally Acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.</i></p> <p><i>C = Conditionally Acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.</i></p> <p><i>N = Normally Unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.</i></p> <p><i>U = Clearly Unacceptable. New construction or development generally should not be undertaken.</i></p> <p><i>Source: Noise Element of the Los Angeles City General Plan, adopted February 3, 1999, Exhibit I, page I-1. (Note: This table is based on the Governor's Office of Planning and Research, "General Plan Guidelines," 1990.)</i></p>							

### *Vibration Standards*

There are no state vibration standards applicable to the Project. However, the California Department of Transportation (Caltrans) noted in its 2002 technical publication titled "Transportation Related Earthborne Vibrations (Caltrans Experiences)" that an upper PPV criterion level of 0.08 to 0.12 inch per second is recommended for continuous vibrations to which "ruins and ancient monuments" should be subjected.<sup>6</sup> This criterion level may also be used for historical buildings, or buildings that are in poor

<sup>6</sup> According to Caltrans' "Transportation Related Earthborne Vibrations (Caltrans Experiences), February 20, 2002" publication, continuous vibrations refer to traffic, train, and most construction vibrations, with the exception of pile driving, blasting, and some other types of construction/demolition.

condition. For normal dwelling houses with plastered walls and ceilings, Caltrans indicates that a PPV criterion level of 0.50 to 2.0 inch per second is the threshold at which there is a risk of “architectural” damage.

### ***Local***

#### *City of Los Angeles General Plan Noise Element*

As discussed previously, the California Government Code Section 65302(g) requires that a noise element be included in the general plan of each county and city in the state. The Noise Element of the City’s *General Plan* identifies sources of noise and provides objectives and policies to ensure that noise from various sources does not create an unacceptable noise environment. Overall, the Noise Element describes the noise environment (including noise sources) in the City, addresses noise mitigation regulations, strategies, and programs as well as delineating federal, state, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise.

The City’s noise standards correlate with land use zoning classifications in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the DHS for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City’s Noise Element and the City’s *L.A. CEQA Thresholds Guide* in terms of the CNEL. The noise/land use compatibility guidelines for land uses within the City are based on those presented on Table IV.H-6.

In accordance with the City’s Noise Element, a noise exposure of 50 dB CNEL is considered normally or conditionally acceptable for the exterior of noise-sensitive land uses. Exposures of 65 dB CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are normally unacceptable for sensitive receptors except in unusual circumstances. See Table IV.H-6 above for more information.

#### *City of Los Angeles Noise Regulation*

The City has numerous ordinances and enforcement practices that apply to intrusive noise as well as ones that guide new construction. The City’s comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Specific key provisions of Chapter XI of the LAMC are discussed below.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 AM and 10:00 PM when the source is located within 500 feet of a residential zone:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 horsepower or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools; or
- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

However, these noise limitations do not apply where compliance is deemed to be technically infeasible, which means that said noise limitations couldn't be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment. The aforementioned limitations apply only to uses in residential zones or within 500 feet thereof.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven onsite as defined in LAMC Section 114.02. These standards apply regardless of the off-site land use.

In addition, Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

#### *City of Los Angeles Groundborne Vibration Regulation*

The City has not adopted any thresholds for construction or operational groundborne vibration impacts. The Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inches per second RMS as a groundborne vibration threshold, which only applies to groundborne vibrations from long-term operational activities. The County of Los Angeles (the "County") has not adopted any thresholds for construction-related groundborne vibration impacts.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G to the *CEQA Guidelines*, a project would have a significant impact if the project would do one or more of the following:

- 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;
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- 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 airstrip, expose people residing or working in the project area to excessive noise levels; or
- f) For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

#### *L.A. CEQA Thresholds Guide*

##### *I. Construction Noise*

According to the *L.A. CEQA Thresholds Guide*, a project would normally have a significant noise impact associated with construction activities if one or more of the following would occur:

- 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 ten days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday.



## 2. Operational Noise

According to the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact due to operational noise levels if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dB(A) in CNEL to or within the “normally unacceptable” or “clearly unacceptable” noise level, or any 5 dB(A) or greater noise increase. The levels at which the CNEL is defined to be “normally unacceptable” or “clearly unacceptable” are summarized as follows:

- 65 dB CNEL: auditoriums, concert halls, and amphitheaters.
- 67 dB CNEL: playgrounds and neighborhood parks.
- 70 dB CNEL: single family homes, duplex homes, mobile homes, multi-family homes, schools, libraries, churches, hospitals, nursing homes, motels, hotels, sports arenas, outdoor spectator sports areas, golf courses, riding stables, water recreation areas, and cemeteries.
- 75 dB CNEL: office buildings, businesses, professional buildings, commercial buildings, industrial uses, manufacturing uses, utilities, and agricultural uses.

### ***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any impacts with respect to issues “e” and “f” listed under the *CEQA Guidelines*, and no further analysis of these issues is required. With regard to issues “a,” “c,” and “d” listed under the *CEQA Guidelines*, the construction and operational noise standards listed under the *L.A. CEQA Thresholds Guide* define the noise levels at which significant impacts associated with these thresholds would occur.

### ***Groundborne Vibration***

Neither the *CEQA Guidelines* nor the *L.A. CEQA Thresholds Guide* defines the levels at which groundborne vibration or groundborne noises are considered “excessive.” Thus, in terms of construction-related vibration impacts on buildings, the adopted guidelines/recommendations by the FTA<sup>7</sup> to limit groundborne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity are used in the analysis to evaluate potential groundborne vibration impacts. Based on the FTA criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;

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<sup>7</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In terms of groundborne vibration impacts associated with human annoyance, this analysis uses the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are an infrequent number of events per day. These thresholds are 65 VdB at buildings where vibration would interfere with interior operations, 80 VdB at residences and buildings where people normally sleep, and 83 VdB at other institutional buildings.<sup>8</sup> The 65 VdB threshold applies to typical land uses where vibration would interfere with interior operations, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipments include, but are not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. The 80 VdB threshold applies to all residential land uses and any buildings where people sleep, such as hotels and hospitals. The 83 VdB threshold applies to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

## **Project Impacts**

### ***Temporary or Periodic Noise Increase***

Construction noise levels were estimated by data published by the U.S. Environmental Protection Agency (EPA). Potential noise levels were identified for off-site locations deemed sensitive to noise, including the immediate existing residences located in proximity to the Project site, based on their respective distances from the Project site. The noise levels were then analyzed against the construction noise standards established in the LAMC to determine whether an exceedance of allowable noise levels would occur at the off-site locations that are sensitive to noise. In addition, the calculated construction noise levels at the off-site, noise-sensitive locations were also compared with the measured ambient noise levels at these locations and analyzed against the thresholds in the *L.A. CEQA Thresholds Guide*.

Construction of the Project would require the use of heavy equipment during the demolition of the existing on-site uses, grading and excavation at the Project site, installation of new utilities, paving, and building fabrication for the proposed mixed-use development. Development activities would also involve

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<sup>8</sup> *Ibid.*

the use of smaller power tools, generators, and other sources of noise. During each stage of development, the mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. Construction of the Project would occur in accordance with Section 41.40 of the LAMC that prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence, between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday, and on Sundays and federal holidays.

The EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. Noise level data pertaining to the types of construction equipment and activities that would occur at the Project site are presented on Table IV.H-7 and Table IV.H-8. The noise levels shown on Table IV.H-8 represent composite noise levels associated with typical construction activities, and take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown on Table IV.H-8, construction noise during the heavier initial periods of construction is presented as 86 dBA  $L_{eq}$  when measured at a reference distance of 50 feet from the center of construction activity.<sup>9</sup> These noise levels would diminish notably with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 86 dBA  $L_{eq}$  measured at 50 feet from the noise source to the receptor would reduce to 80 dBA  $L_{eq}$  at 100 feet from the source to the receptor, and reduce by another 6 dBA  $L_{eq}$  to 74 dBA  $L_{eq}$  at 200 feet from the source to the receptor.

During construction, three basic types of activities would generate noise at the Project site: 1) demolition of the existing commercial; 2) grading and excavation activities to accommodate the proposed residential uses; and 3) physical construction of the new residential structures. Overall, construction activities at the Project site are anticipated to begin in year 2013 with occupancy in year 2015.

The most notable off-site sensitive receptors that could be affected by the Project's construction activities include the following:

- The Norwood Street Elementary School located approximately 64 feet east of the Project site, across Oak Street;
- The single-family residences located south of the Project site, across 20<sup>th</sup> Street, with the nearest residence located approximately 55 feet away from the Project site;

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<sup>9</sup> Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA  $L_{eq}$  (i.e., the equipment does not operate at the peak noise level over the entire duration).

**Table IV.H-7  
Noise Range of Typical Construction Equipment**

<b>Construction Equipment</b>	<b>Noise Level in dBA <math>L_{eq}</math> at 50 Feet <sup>a</sup></b>
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
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88
<sup>a</sup> Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table. Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.	

**Table IV.H-8  
Typical Outdoor Construction Noise Levels**

<b>Construction Phase</b>	<b>Noise Levels at 50 Feet with Mufflers (dBA <math>L_{eq}</math>)</b>	<b>Noise Levels at 60 Feet with Mufflers (dBA <math>L_{eq}</math>)</b>	<b>Noise Levels at 100 Feet with Mufflers (dBA <math>L_{eq}</math>)</b>	<b>Noise Levels at 200 Feet with Mufflers (dBA <math>L_{eq}</math>)</b>
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; CAJA, 2010.				

- The single-family residences located west of the Project site, with the nearest residence located approximately 204 feet away from the Project site; and

- The Downtown Value School located approximately 292 feet west of the Project site.

As shown on Table IV.H-8, outdoor noise levels at noise-sensitive receptors 50 feet from the noise source could range from 77 dBA to 86 dBA  $L_{eq}$  with the use of noise-attenuating devices. Table IV.H-9 shows the peak construction noise levels that could occur at the off-site noise-sensitive uses during construction of the Project compared to the existing daytime ambient noise levels at these noise-sensitive uses. As shown on Table IV.H-9, the peak construction noise level increase experienced by the off-site sensitive receptors would range from approximately 4.3 dBA  $L_{eq}$  at the Downtown Value School located west of the Project site to approximately 28.1 dBA  $L_{eq}$  at the single-family residence located directly south of the Project site, across 20<sup>th</sup> Street, with the use of mufflers on the construction equipment. Thus, the Project would result in construction-related noise levels that would exceed the City's threshold of 5 dBA for construction activities lasting more than 10 days in a three-month period. Therefore, Project impacts related to construction noise would be significant.

**Table IV.H-9**  
**Exterior Noise at Off-site Sensitive Uses From Project Construction**

Off-site Sensitive Land Uses	Location	Approximate Distance to Project site Boundary (ft.)	Existing Monitored Daytime Ambient Noise Levels (dBA $L_{eq}$ )	Estimated Peak Construction Noise Levels (dBA $L_{eq}$ )	Noise Level Increase
Norwood Street Elementary School	East of the Project site, across Oak Street.	64	60.5	83.9	23.4
Single-family residences	South of the Project site, across 20 <sup>th</sup> Street.	55	57.1	85.2	28.1
Single-family residences	West of the Project site fronting 20 <sup>th</sup> Street, beyond the one-story commercial building located immediately west of the Project site.	204	56.2	73.8	17.6
Downtown Value School	West of the Project site, beyond the one-story commercial building located immediately west of the Project site.	292	66.4	70.7	4.3

*Source: CAJA Environmental Services, 2011; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.*

### **Construction-Related Groundborne Vibration**

Groundborne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration. In this analysis, potential vibration levels resulting from construction of the Project were identified for off-site locations that are sensitive to vibration, including existing residences. Construction activities that would occur within the Project site

would include demolition as well as grading and excavation, which would have the potential to generate low levels of groundborne vibration. Table IV.H-10 identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate during the construction of the Project. Based on the information presented on Table IV.H-10, vibration velocities could reach as high as approximately 0.089 inches per second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity.

**Table IV.H-10  
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
<i>Note: in/sec = inches per second.</i>										
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006; CAJA, December 2008.</i>										

As discussed previously, construction activities would have the potential to impact the nearest surrounding off-site sensitive receptors to the Project site, which include the following:

- The Norwood Street Elementary School located approximately 64 feet east of the Project site, across Oak Street;
- The single-family residences located south of the Project site, across 20<sup>th</sup> Street, with the nearest residence located approximately 55 feet away from the Project site;
- The single-family residences located west of the Project site, with the nearest residence located approximately 204 feet away from the Project site; and
- The Downtown Value School located approximately 292 feet west of the Project site.

Table IV.H-11 shows the construction-related groundborne vibration levels that would occur at the identified off-site sensitive uses during construction at the Project site. As shown on Table IV.H-11, the vibration velocities forecasted to occur at the off-site sensitive receptors would range from 0.002 PPV at the Downtown Value School located west of the Project site to 0.03 PPV at the single-family residences located directly south of the Project site, across 20<sup>th</sup> Street. None of the buildings at the identified off-site

sensitive use locations are considered to be “fragile” structures, such as historical buildings or buildings that are extremely susceptible to vibration damage. For the purpose of this analysis, the surrounding off-site sensitive receptors such as the single-family residences and the school buildings are considered to be “non-engineered timber and masonry buildings.” Based on the information shown on Table IV.H-11, none of the identified off-site sensitive receptors would be exposed to PPV groundborne vibration levels that exceed 0.2 inches per second during construction of the Project.

**Table IV.H-11**  
**Groundborne Vibration Levels at Off-site Sensitive Uses From Project Construction**

<b>Off-site Sensitive Land Use</b>	<b>Approximate Distance to Project site (ft.)</b>	<b>Estimated PPV (in/sec)</b>	<b>Estimated Peak Construction-Related Groundborne Vibration Levels (VdB)</b>
Norwood Street Elementary School, east of the Project site, across Oak Street.	64	0.02	74.8
Single-family residences, south of the Project site, across 20 <sup>th</sup> Street.	55	0.03	76.7
Single-family residences, west of the Project site fronting 20 <sup>th</sup> Street, beyond the one-story commercial building located immediately west of the Project site.	204	0.004	59.6
Downtown Value School, west of the Project site, beyond the one-story commercial building located immediately west of the Project site.	292	0.002	55.0
<i>Notes: ft. = feet; in/sec = inches per second.</i>			
<i>Source: CAJA, 2010; Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.</i>			

In addition, the Project site is located in the University Park Historic Preservation Overlay Zone (HPOZ), which contains historic structures. Based on a review of the HPOZ map, the nearest contributing parcel is located approximately 55 feet to the south of the Project site. As shown on Table IV.H-11, the vibration velocities forecasted to occur at a distance of approximately 55 feet would be 0.03 PPV. As discussed previously, vibration thresholds relative to historic and potentially historic buildings are more restrictive than the threshold for non-engineered timber and masonry buildings. Specifically, Project construction activities could result in significant impacts if a PPV ground-borne vibration level was to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage. As the closest contributing parcel containing a historic structure located at approximately 55 feet from the Project site would experience maximum vibration levels of 0.03 PPV, there is no potential for the Project to generate ground-borne vibration levels that exceed the threshold of 0.12 inches per second at a

historical building. Thus, in terms of building damage, a less than significant impact would occur at all the identified off-site sensitive receptors.

In terms of human annoyance, the vibration levels forecasted to occur at the off-site sensitive receptors would range from 55.0 VdB at the Downtown Value School located west of the Project site to 76.7 VdB at the single-family residence located directly south of the Project site, across 20<sup>th</sup> Street. Because the vibration levels experienced at all of the identified off-site sensitive receptors would not exceed the FTA's threshold of 80 VdB for residences or places where people may sleep or 83 VdB for institutional buildings (e.g., schools), the vibration impact at these off-site sensitive uses would be less than significant.

### ***Permanent Noise Increase***

Noise sources at the Project site that would result in permanent increases in noise levels at off-site receptors during Project operation would include rooftop HVAC equipment, the Project's parking facility, and traffic generated by the Project. An analysis of each of these noise sources is discussed below.

#### ***HVAC Units***

The Project would include rooftop HVAC units, and exhaust fans would be installed on the proposed mixed-use building. Although the operation of this equipment would generate noise, the distances of the multi-family residential uses to the west, across Hayworth Avenue, the south, across Beverly Boulevard, and the east, across Fairfax Avenue, of the Project site would be adequate enough such that these noise sources would not potentially disturb the existing off-site sensitive receptors. The noise levels generated by the new HVAC units and exhaust fans for the Project could potentially disturb the Silverado Senior Living multi-family residential uses to the west of the Project site, across the alleyway, due to their proximity to the Project site. Although operation of these equipment would generate noise, the incorporation of the operation-related Project design features would ensure that these on-site mechanical equipment would 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 five decibels. Thus, the on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby noise-sensitive uses. As such, noise impacts on off-site sensitive uses from operation of mechanical equipment at the Project site would be less than significant.

In order to ensure that on-site operational noise would not adversely affect the future residents at the Project site, and as part of the City's Standard Mitigation Measure G-12 would be implemented to ensure that all exterior windows associated with the proposed residential uses would be constructed such that sufficient sound insulation is provided to ensure that interior noise levels would be below a CNEL of 45 dBA in any residential unit.



### *Parking Facility Noise*

Noise would be generated by activities within the two subterranean levels of parking that would be constructed with the development of the Project. Sources of noise within the parking areas would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project site. As the two subterranean parking levels of the Project would be fully enclosed on all sides, noise generated at these levels would not affect the existing off-site sensitive receptors located near to the Project site. In addition, as discussed previously, operational-related noise generated by motor driven vehicles within the Project site are regulated under the LAMC. Specifically, with regard to motor driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Thus, noise impacts associated the Project's parking would be less than significant.

### *Traffic Noise*

The increase in traffic resulting from implementation of the Project would increase the ambient noise levels at sensitive off-site locations in the Project vicinity. These concerns were addressed using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), which calculates the CNEL noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances, speeds and/or noise barriers. Based on the traffic report prepared for the Project, included as Appendix IV.K to this Draft EIR, in combination with an analysis of the surrounding land uses, roadway noise levels were forecasted to determine if the Project's vehicular traffic would result in a significant impact at off-site noise-sensitive receptor locations.

Off-site locations in the Project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the Project. The increases in noise levels at selected roadway segments located in close proximity to the Project site are identified on Table IV.H-12. As shown on Table IV.H-12, the Project would increase local noise levels by a maximum of 0.6 BA CNEL for the roadway segment of Oak Street, south of Washington Boulevard, which would not exceed the identified thresholds of significance. Because the increase in local noise levels at all of the analyzed roadway segments resulting from implementation of the Project would not exceed the 3 dBA and 5 dBA CNEL thresholds established under the *L.A. CEQA Thresholds Guide*, this impact would be less than significant. In addition, as the other roadway segments that are located even further away from the Project site would experience less traffic increases due to the Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and impacts would be less than significant.

**Table IV.H-12  
Predicted Future Roadway Noise Levels Off-site**

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Noise Levels in dBA CNEL					
		Existing (2009)	Existing (2009) With Project	Increase <sup>a</sup>	Future (2015) Without Project	Future (2015) With Project	Increase <sup>a</sup>
Washington Boulevard, east of Oak Street	Commercial	70.4	70.4	0.0	71.1	71.2	0.1
Washington Boulevard, between Oak Street and Toberman Street	Commercial	70.4	70.4	0.0	71.1	71.2	0.1
Washington Boulevard, between Toberman Street and Union Street	Commercial	70.7	70.7	0.0	71.4	71.5	0.1
18 <sup>th</sup> Street, between Toberman Street and Union Avenue	Residential	53.4	53.4	0.0	53.7	53.8	0.1
23 <sup>rd</sup> Street, east of Oak Street	Residential	63.4	63.4	0.0	63.8	63.9	0.1
23 <sup>rd</sup> Street, between Toberman Street and Oak Street	Residential	63.4	63.5	0.1	63.8	64.0	0.2
23 <sup>rd</sup> Street, between Union Avenue and Toberman Street	Residential	62.9	63.0	0.1	63.4	63.5	0.1
Oak Street, north of Washington Boulevard	Residential & Commercial	48.9	48.9	0.0	49.1	49.1	0.0
Oak Street, south of Washington Boulevard	School	55.2	55.7	0.2	55.4	56.0	0.6
Union Avenue, between 18 <sup>th</sup> Street and Washington Boulevard	Residential & Commercial	63.1	63.2	0.1	63.7	63.9	0.2
Union Avenue, south of Washington Boulevard	Residential & Commercial	61.5	61.5	0.0	62.3	62.4	0.1
<sup>a</sup> 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 Table IV.H-6, Community Noise Exposure (CNEL)). Thus, for the purpose of this analysis, the significance threshold is 3 dBA if the noise increase resulting from the Project would meet or exceed the City’s 70 dBA CNEL noise level standard at residential uses and 77 dBA CNEL noise level standard at commercial uses, which are still within the “conditionally acceptable” noise category for the two land uses, while the significance threshold is 5 dBA if the noise increase would be below the City’s 70 dBA CNEL noise level standard for residential uses and 77 dBA CNEL noise level standard for commercial uses. Along roadway segments that have residential and commercial uses, the noise level standard for residential uses was used, which would allow for a conservative analysis. Traffic Information Source: Linscott Law & Greenspan, Engineers, Traffic Impact Study, Oak Village Residences Project, July 14, 2009; and Supplemental Traffic Analysis, August 2, 2012. Table Source: Parker Environmental Consultants, September 2012. Calculation data and results are provided in Appendix IV.H.							

### **Operational Vibration**

The Project would not include stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project

site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project site would not result in the increased use of these heavy-duty vehicles. Although refuse trucks would be used for the disposal of solid waste at the Project site, these trips would typically only occur once a week and would not be any different than those presently occurring at the Project site for the existing commercial use. As such, vibration impacts associated with operation of the Project would be less than significant.

## **CUMULATIVE IMPACTS**

### **Temporary or Periodic Noise Increase**

Related project #12 (refer to Table II-1 in Section II [Environmental Setting]) is the closest related project to the Project site, at approximately 2.5 miles away. Development of the Project in combination with the related projects may result in an increase in construction-related and traffic-related noise in this already urbanized area of the City. However, each of the related projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the related projects would be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With conformance with LAMC Sections 41.40 and 112.05, the cumulative construction noise impact would be less than significant.

Future construction associated with the related projects could result in a cumulatively significant impact with respect to temporary or periodic increases in ambient noise levels. Construction noise is localized in nature and decreases substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to the Project. As discussed previously, the closest related projects to the Project site is located approximately 2.5 miles away from the Project site. Due to this distance, and along with the numerous intervening structures located between these two sites, a substantial increase in construction noise levels would not occur should construction for this related project occur at the same time as the Project. Therefore, this cumulative impact would be less than significant.

### ***Construction-Related Groundborne Vibration***

Cumulative development in the City may result in the exposure of people to, or the generation of, excessive groundborne vibration when construction activities associated with projects in proximity to each other occur at the same time. As the nearest related project is located approximately 2.5 miles from the Project site, the Project and this related project are not in close enough proximity to each other to affect the same noise-sensitive receptors. Only receptors located directly proximate to each construction site would be potentially impacted by the vibration levels generated at each development site. Therefore,

future development would result in a less than significant cumulative impact in terms of groundborne vibration.

### **Permanent Noise Increase**

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future year 2015 cumulative base traffic volumes on the roadway segments in the project vicinity. The noise levels associated with existing traffic volumes and cumulative base traffic volumes with the Project (i.e., future cumulative traffic volumes) are identified on Table IV.H-13. As shown therein, cumulative development along with the Project would increase local noise levels by a maximum of 0.9 dBA CNEL at the roadway segment of Union Avenue, south of Washington Boulevard. As the increase in roadway noise would not exceed the 3.0 dBA CNEL and 5.0 dBA CNEL thresholds at any of the study roadway segments, the noise increase would not be substantial. Therefore, the cumulative impact associated with mobile source noise would be less than significant.

## **MITIGATION MEASURES**

### **Temporary or Periodic Noise Increase (Construction-Related Noise)**

Because the Project would result in significant impacts related to a temporary or periodic noise increase (i.e., construction noise) during construction, the following mitigation measures are required:<sup>10</sup>

- H-1: The project shall comply with the City of Los Angeles Noise Ordinance No. 144331 and 161574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- H-2: Construction and demolition shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, and prohibited on all Sundays and federal holidays.
- H-3: Noise and groundborne vibration construction activities whose specific location on the Project 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- and vibration-sensitive land uses.
- H-4: Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

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<sup>10</sup> Some of these mitigation measures are Standard City Mitigation Measures.

**Table IV.H-13  
Cumulative Project Roadway Noise Impacts**

Roadway Segment	Existing Land Uses Located Along Roadway Segment	Noise Levels in dBA CNEL				
		Existing (2009) Traffic Volumes	Future (2015) With Project Traffic Volumes	Cumulative Increase	Significance Threshold <sup>a</sup>	Significant?
Washington Boulevard, east of Oak Street	Commercial	70.4	71.2	0.8	5.0	No
Washington Boulevard, between Oak Street and Toberman Street	Commercial	70.4	71.2	0.8	5.0	No
Washington Boulevard, between Toberman Street and Union Street	Commercial	70.7	71.5	0.8	5.0	No
18 <sup>th</sup> Street, between Toberman Street and Union Avenue	Residential	53.4	53.8	0.4	5.0	No
23 <sup>rd</sup> Street, east of Oak Street	Residential	63.4	63.9	0.5	5.0	No
23 <sup>rd</sup> Street, between Toberman Street and Oak Street	Residential	63.4	64.0	0.6	5.0	No
23 <sup>rd</sup> Street, between Union Avenue and Toberman Street	Residential	62.9	63.5	0.6	5.0	No
Oak Street, north of Washington Boulevard	Residential & Commercial	48.9	49.1	0.2	5.0	No
Oak Street, south of Washington Boulevard	School	55.2	56.0	0.8	5.0	No
Union Avenue, between 18 <sup>th</sup> Street and Washington Boulevard	Residential & Commercial	63.1	63.9	0.8	5.0	No
Union Avenue, south of Washington Boulevard	Residential & Commercial	61.5	62.4	0.9	5.0	No
<sup>a</sup> 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 Table IV.H-6, Community Noise Exposure (CNEL)). Thus, for the purpose of analysis, the significance threshold is 3 dBA if the noise increase resulting from the Project would meet or exceed the City's 70 dBA CNEL noise level standard at residential uses and 77 dBA CNEL noise level standard at commercial uses, which are still within the "conditionally acceptable" noise category for the two land uses, while the significance threshold is 5 dBA if the noise increase would be below the City's 70 dBA CNEL noise level standard for residential uses and 77 dBA CNEL noise level standard for commercial uses. Along roadway segments that have residential and commercial uses, the noise level standard for residential uses was used, which would allow for a conservative analysis. Traffic Information Source: Linscott Law & Greenspan, Engineers, Traffic Impact Study, Oak Village Residences project, July 14, 2009; and Supplemental Traffic Analysis, August 2, 2012. Table Source: Parker Environmental Consultants, September 2012. Calculation data and results are provided in Appendix IV.H.						

H-5: The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers.

- H-6: The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- H-7: A ½-inch thick plywood barrier extending ten-feet high shall be erected around the project site boundary to minimize the amount of noise on the surrounding noise-sensitive receptors to the maximum extent feasible during construction.
- H-8: 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.
- H-9: The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.
- H-10: Two weeks prior to the commencement of construction at the Project site, notification must be provided to the immediate surrounding off-site residential and school uses that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

#### **Permanent Noise Increase (Operational Noise)**

Because no significant operational noise impacts were identified, no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- H-11: All new mechanical equipment associated with the Project shall comply with Section 112.02 of the City of Los Angeles Municipal Code, 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 five decibels.
- H-12: All exterior windows associated with the proposed residential uses at the Project site 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.

## LEVEL OF SIGNIFICANCE AFTER MITIGATION

With compliance with Section 41.40 of the LAMC and the implementation of the Mitigation Measures H-1 through H-10 listed above, which would require the implementation of noise reduction devices and techniques during construction at the Project site, construction-related noise impacts associated with the Project would be reduced to the maximum extent feasible. Specifically with respect to Mitigation Measure H-7, Table 3 of the FHWA Noise Barrier Design Handbook<sup>11</sup> indicates a ½-inch thick plywood has a sound transmission loss value of 20 dBA and properly-designed noise barriers should attain an Insertion Loss (IL) approaching 10 dBA, which is equivalent to a perceived halving in loudness for the first row of receptors directly behind the barrier. Generally, a 5 dBA IL can be expected for receivers whose line-of-sight to the source is blocked by the barrier and each additional meter of barrier height above line-of-sight blockage will provide about 1.5 dBA of additional attenuation. Thus, assuming a line-of-sight height of 6 feet, a 10-foot barrier would provide an approximate 7 dBA reduction. With the combination of the proposed barrier and the other mitigation measure, it is reasonable to assume an approximate 10 dBA reduction would be achieved at the adjacent noise sensitive receptors. Table 4 of the FHWA Noise Barrier Design Handbook indicates the design feasibility of a sound barrier that reduces noise by 5 dBA is considered “simple” and a reduction of up to 10 dBA as “attainable.” It should be noted that reductions of 15 and 20 dBA are considered “very difficult” and “nearly impossible,” respectively. Thus, the proposed mitigation measures would reduce construction noise impacts on adjacent sensitive receptors to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable.

All other noise impacts of the Project would be less than significant.

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<sup>11</sup> FHWA Noise Barrier Design Handbook; webpage updated July 14, 2011; accessed May 2013 [http://www.fhwa.dot.gov/environment/noise/noise\\_barriers/design\\_construction/design/design03.cfm](http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm)

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### I. POPULATION & HOUSING

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#### ENVIRONMENTAL SETTING

##### Regulatory Framework

##### Regional Plans

##### *Southern California Association of Governments (SCAG)*

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. As part of its comprehensive planning process for the southern California region, the Southern California Association of Governments (SCAG) has divided its jurisdiction into 14 subregions. The Project site is located within the City of Los Angeles (the “City”) subregion, which includes all areas within the boundaries of the City. Applicable SCAG publications are discussed below.

##### *Southern California Compass Growth Vision Report (the “Compass Growth Vision”)*

The *Compass Growth Vision* was published by SCAG in June 2004 and presents a comprehensive growth vision for the six-county SCAG region, as well as the achievements of the process for developing the growth vision. The report details the evolution of the draft vision from the study of emerging growth trends and systematic modeling of the effects of alternative growth pattern scenarios on transportation systems, land consumption, and other factors.

The *Compass Growth Vision* notes that population and household growth trends and existing housing conditions point to an unmet demand for a greater diversity of housing throughout the six-county region. For example, while existing multi-family units account for a significant proportion of the overall supply, at about 40 percent, multi-family buildings are being added to the total housing stock at a much lower proportion. As a result, the demand for such housing (e.g., from immigrant populations, young adults, and seniors) is outpacing multi-family production.

In its discussion about land supply, the *Compass Growth Vision* notes that the region faces a severe limit on the amount of undeveloped land suitable for development, which hinders its ability to accommodate new housing and jobs. It finds that under current general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land.



Further, with limited undeveloped land, already developed land will become increasingly important in accommodating growth. Infill, or new development in already developed areas, will be the method used to construct nearly half of the new housing region wide. In the City, infill development could accommodate up to 80 percent of the projection for this area. The *Compass Growth Vision* concluded that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure proved to be of enormous benefit in accommodating future growth.

Four principles were established for the *Compass Growth Vision* that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below. In addition, SCAG is in the process of implementing an associated *Compass Growth Vision* "2% Strategy," which embodies the idea that small, incremental, and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to the individual cities.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2) locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.
- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize "green" development techniques.

***Regional Comprehensive Plan (RCP)***

SCAG has also prepared and issued the *2008 RCP* in response to SCAG's Regional Council directive in the *2002 Strategic Plan* to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.<sup>1</sup> The *2008 RCP* is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The *2008 RCP* may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the *Compass Growth Vision* and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The *2008 RCP* replaced SCAG's 1996 *Regional Comprehensive Plan and Guide (RCPG)* for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the *2008 RCP*, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the *2008 RCP* is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the *2008 RTP* and *Compass Growth Vision*.

***Regional Transportation Plan (RTP)***

Since 1976, SCAG has prepared and adopted RTPs since 1976 and has considered the RTP primarily as an investment in the six-county (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) region's mobility. The RTP identifies infrastructure projects and improvements in order to reduce traffic and generally make it easier to get around. As the process has evolved and RTPs have been updated, SCAG has gradually broadened its viewpoint, particularly by elevating air quality considerations in the plan. This evolution has culminated in the most recently adopted 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the "2012-2035 RTP/SCS"), which has mobility as an important component of a much larger picture that incorporates added emphasis on sustainability and integrated planning. The vision for the 2012-2035 RTP/SCS encompasses three principles as the key to our region's future: mobility, economy, and sustainability.

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<sup>1</sup> SCAG, *2008 Regional Comprehensive Plan*, <http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP>

The 2012-20135 RTP/SCS is an investment in the region's future well-being through 2035 and contains projects, policies, and strategies that will achieve a range of positive outcomes when implemented. In one sense, the 2012-2035 RTP/SCS is an accounting of revenues and expenditures and identifies SCAG's available and reasonably foreseeable sources of funding and directs that funding to multimodal transportation projects that benefit the region's communities. The 2012-2035 RTP/SCS strategies and policies are designed to assure that, to the greatest extent possible, the money invested has the best chance of achieving shared objectives.

In a broader sense, the 2012-2035 RTP/SCS is a blueprint for improving the quality of life for the region's residents by making the best transportation and land use choices for the future and supporting those choices with wise investments. The 2012-2035 RTP/SCS will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for the region's residents. Furthermore, the 2012-2035 RTP/SCS will create jobs, ensure the region's economic competitiveness through strategic investments in our goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2035.

### ***Regional Housing Needs Assessment (RHNA)***

The RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The most recently completed RHNA planning period is January 1, 2006 to June 30, 2014. The 5th cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021 was adopted by the Regional Council on October 4, 2012. Fifth cycle housing element updates must be adopted by October 15, 2013.

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. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair-share housing needs.

### **Local Plans and Regulations**

#### ***City of Los Angeles General Plan (the "General Plan")***

State law requires that every city and county prepare and adopt a long-range comprehensive general plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan (the "*General Plan*") addresses community development goals and policies relative to the distribution of public and private land use. The *General Plan* integrates the State-mandated

elements including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation, as well as additional elements adopted by the City. Two major components of the General Plan are the Citywide General Plan Framework Element and the Land Use Element, which comprises 35 local area plans known as Community Plans that guide land use at the local level. Within each Community Plan area, there may also be Specific Plans, which sets forth additional land use standards and regulations for new development occurring within a specific area.

#### *General Plan Framework Element*

The Citywide General Plan Framework Element (the “General Plan Framework”), adopted in December 1996 and readopted in August 2001, establishes the conceptual relationship between land use and transportation on a citywide basis and defines new land use categories that better describe the character and function of the city as it has evolved over time. The new categories - Neighborhood District, Community Center, Regional Center, Downtown Center and Mixed Use Boulevards - are broadly defined and identified as generalized locations shown on a series of long-range land use diagrams included in the General Plan Framework. There is no land use category identified for the Project site on these diagrams, and because it is only a citywide guide, and the General Plan Framework cannot anticipate every detail, the community plans must be looked to for final determinations as to boundaries, land use categories, intensities and heights that fall within the ranges described by the Framework.

#### *South Los Angeles Community Plan<sup>2</sup>*

The Project site is located in the *South Los Angeles Community Plan* area, which is located approximately 3 miles southwest of Downtown Los Angeles and contains approximately 9,881 acres or approximately 15.8 square miles of land area. The plan area is bounded on the north by Pico Boulevard, on the east by Figueroa Street and Broadway, 120<sup>th</sup> Street and the County of Los Angeles form the southern boundary, and Van Ness/Arlington Avenues form the boundary of the Community on the west.

The *South Los Angeles Community Plan* is organized into five chapters. The applicable chapters addressed in this land use analysis are: Chapter III, Land Use Policies and Programs, which identifies goals, policies, and programs with respect to the land use types within the plan area; and Chapter V, Urban Design, which provides project-specific design standards for various land uses (i.e., commercial, residential, industrial), as well as general community design/landscaping guidelines related to entryway improvements, streetscape, street trees, street furniture, street lighting, sidewalks/paving, signage, and public open space/plazas.

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<sup>2</sup> The City is currently updating the *South Los Angeles Community Plan*, but the updated plan is not yet publicly available.

The Project site is designated as Industrial “Commercial Manufacturing” in the *South Los Angeles Community Plan* (refer to Figure IV.G-1). This citywide zoning designation allows for wholesale storage, clinics, limited manufacturing, limited C2 (Commercial) uses and R3 (Residential) uses, although Policy 2-1.2 specifically discourages residential only development in commercially planned/zoned areas. To implement this policy, the *South Los Angeles Community Plan* requires a decision-maker to make a finding that any proposed residential only development in a commercial area is compatible in scale, character and design with adjacent commercial development.

The expressed goals and objectives for residential, commercial, and industrial land uses in the community plan area are as follows:

Goal 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.

Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of existing residents and projected population of the Plan area.

Objective 1-2: To locate new housing in a manner that reduces vehicular trips and makes it accessible to services and facilities.

Objective 1-3: To preserve and enhance the varied and distinct residential character integrity of existing single- and multi-family neighborhoods.

Objective 1-4: To preserve and enhance neighborhoods with distinctive and significant historical character.

Objective 1-5: To promote and ensure the provision of adequate housing for all persons regardless of income, age, or ethnic background.

Objective 1-6: To limit the intensity and density of development according to the underlying geology and capacity of the infrastructure.

Goal 2: A strong and competitive commercial sector that best serves the needs of the community through maximum efficiency and accessibility while preserving the historic commercial and cultural character of the district.

Objective 2-1: To conserve and strengthen viable commercial development.

Objective 2-2: Allow for the development of automobile-related uses in appropriate commercial designations along major arterials.

Objective 2-3: To attract uses that strengthen the economic base and expand market opportunities for existing and new businesses.

Objective 2-4: To enhance the identity of distinctive commercial districts and to identify Pedestrian Oriented Areas (POA's).

Objective 2-5: To enhance the appearance of commercial districts.

Objective 2-6: To maintain and increase the commercial employment base for community residents whenever possible.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities that are safe for the environment and the work force, and that have minimal adverse impact on adjacent uses.

Objective 3-1: To provide for existing and future industrial uses that contribute job opportunities for residents and that minimize environmental and visual impacts to the community.

Objective 3-2: To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

### **Population, Housing, and Employment Projections**

SCAG's growth projections for the City, *South Los Angeles Community Plan* area, and Census Tract 1945.00 are summarized on Table IV.I-1. Based on SCAG data, in 2010, the City had an estimated permanent population of approximately 4,140,516 persons, 1,386,658 households, and employment for 1,860,672 persons. By the year 2015, SCAG estimates that the City will have an estimated permanent population of approximately 4,214,083 persons (an increase of 1.78 percent from 2010), 1,445,177 households (an increase of 4.22 percent), and will provide employment for 1,905,337 persons (an increase of 2.40 percent). By 2020, SCAG estimates that the City will have an estimated permanent population of approximately 4,292,139 persons (an increase of 1.85 percent from 2015), 1,506,564 households (an increase of 4.24 percent), and will provide employment for 1,933,860 persons (an increase of 1.50 percent).

The Project site is located entirely within Census Tract 1945.00. According to SCAG data and projections, in 2010, Census Tract 1945.00 had an estimated permanent population of approximately 2,491 persons, 1,061 households, and provided employment for 2,469 persons. SCAG estimates that by 2015, Census Tract 1945.00 will have a permanent population of approximately 2,542 persons (an increase of 2.05 percent from 2010), 1,114 households (an increase of 5.0 percent), and will provide employment for 2,505 persons (an increase of 1.46 percent). SCAG estimates that by 2020, Census Tract

1945.00 will have a permanent population of approximately 2,597 persons (an increase of 2.16 percent from 2015), 1,168 households (an increase of 4.85 percent), and will provide employment for 2,527 persons (an increase of 0.88 percent).

**Table IV.I-1  
Population, Housing, and Employment Projections for  
the City of Los Angeles/Los Angeles Subregion,  
South Los Angeles Community Plan, and  
Project Site Census Tract**

<b>City of Los Angeles/Los Angeles Subregion<sup>a</sup></b>			
<b>Year</b>	<b>Population</b>	<b>Households</b>	<b>Employment</b>
2008	3,770,500	1,309,900	1,735,200
2020	3,991,700	1,455,700	1,817,700
2035	4,320,600	1,626,600	1,906,800
<b>Percent Change</b>			
2008 to 2020	5.54%	10.01%	4.53%
2020 to 2035	7.61%	10.50%	4.67%
<b>27-year Growth Forecast</b>	<b>550,100 (12.73%)</b>	<b>317,000 (19.47%)</b>	<b>171,600 (8.99%)</b>
<b>Community Plan<sup>b</sup></b>			
<b>Year</b>	<b>Population</b>	<b>Households</b>	<b>Employment</b>
2008	290,890	82,636	NA
2020	299,914	88,948	NA
2035	311,200	97,900	NA
<b>Percent Change</b>			
2010 to 2020	3.00%	7.09%	NA
2020 to 2035	3.62%	9.14%	NA
<b>27-year Growth Forecast</b>	<b>20,310 (6.52%)</b>	<b>15,264 (15.59%)</b>	<b>NA</b>
<b>Census Tract 1945.00<sup>c</sup></b>			
<b>Year</b>	<b>Population</b>	<b>Households</b>	<b>Employment</b>
2008	2,481	1,051	2,433
2020	2,597	1,168	2,527
2035	2,749	1,285	2,609
<b>Percent Change</b>			
2010 to 2020	4.46%	9.50%	3.86%
2020 to 2035	5.52%	9.10%	3.14%
<b>27-year Growth Forecast</b>	<b>268 (9.74%)</b>	<b>234 (18.21%)</b>	<b>176 (6.74%)</b>
<sup>a</sup> Source: SCAG Adopted 2012 RTP Growth Forecast. <sup>b</sup> Source: City of Los Angeles, 2011. The population and housing projections provided by the City for the South Los Angeles Community Plan area are for the year 2035. Projections for the years 2008 and 2020 for the Community Plan area were extrapolated from the 2010 projections in the existing Community Plan and the 2035 projections. <sup>c</sup> Source: SCAG Adopted 2008 TRP Growth Forecast by Census Tract. NA = Not Available.			

## **Project Site**

The Project site is currently used as a commercial catering facility and is developed with a one-story, brick building of approximately 12,335 square feet (built in 1978) that fronts Washington Boulevard and a paved surface parking lot that extends south behind the building to the end of the Project site at 20<sup>th</sup> Street. The existing on-site retail uses at the Project site employ approximately 11 persons. No residential development or permanent population is located on the Project site.

## **ENVIRONMENTAL IMPACT**

### **Thresholds of Significance**

#### ***Appendix G of the CEQA Guidelines***

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant impact if the project would result in one or more of the following:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

#### ***L.A. CEQA Thresholds Guide***

The *L.A. CEQA Thresholds Guide* requires the analysis of population, housing, and employment to address the following two areas of study: (1) population and housing growth, and (2) population and housing displacement. With respect to population and housing growth, the *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- 1) 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;
- 2) Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan;



- 3) The extent to which growth would occur without implementation of the project;
- 4) The total number of residential units to be demolished, converted to market rate, or removed through other means, as a result of the project, in terms of net loss of market rate and affordable units;
- 5) The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- 6) The land use and demographic characteristics of the project area, and the appropriateness of housing in the area; and
- 7) Whether the project is consistent with adopted City and regional housing policies such as the Framework and housing elements, U.S. Department of Housing and Urban Development (HUD) consolidated plan and CHAS policies, redevelopment plan, Rent Stabilization Ordinance, and the RCPG.

### **Discussion of Significance Thresholds**

As discussed in Section IV.A (Impacts Found to be Less Than Significant), with regard to issue “a,” listed under the *CEQA Guidelines*, the Project would not result in any impacts related to development of infrastructure, and no further discussion related to this threshold is required. (Project impacts related to development of new housing is discussed below.) Additionally, as discussed in Section IV.A, the Project would not result in any impacts related to issues “b” and “c” listed under *CEQA Guidelines*, and no further discussion related to these thresholds is required.

Regarding factors 1, 3, 5, 6, and 7 listed under the *L.A. CEQA Thresholds Guide*, these factors are considered along with issue “a” (regarding new housing) listed above under the *CEQA Guidelines*.

Regarding factor 2 listed under the *L.A. CEQA Thresholds Guide*, this factor is similar to issue “a” (regarding infrastructure) listed above under the *CEQA Guidelines*. For reasons discussed previously, no further discussion of this issue is required.

Regarding factor 4 listed under the *L.A. CEQA Thresholds Guide*, this factor is similar to issue “b” listed above under the *CEQA Guidelines*. For reasons discussed previously, no further discussion of this issue is required.

## **Project Impacts**

### ***Indirect Growth***

Development of the Project would result in temporary construction employment opportunities during the Project's construction phase. However, for the following reasons, construction workers likely would not relocate their households as a consequence of temporary construction employment associated with the Project:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. The off-peak starting and ending times of the typical construction workday facilitate their sometimes lengthy, daily commutes;
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. 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.

As such, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators). Therefore, housing and population impacts associated with the construction of the Project would be less than significant.

As discussed previously, approximately 11 employees currently work at the Project site. The Project does not include any permanent long-term employment. Thus, the Project would not result in any population growth due to employment.

### ***Direct Growth***

#### ***Population***

The Project includes development of 142 multi-family dwelling units. According to the *South Los Angeles Community Plan*, the Community Plan area has an average of 3.5 persons per household. Thus, the Project would result in an increase of approximately 497 residents at the Project site. Based on the existing land use designation and zoning for the Project site, the site could be developed with a combination of commercial, parking, and residential (refer to Alternative C in Section VI [Alternatives]) or a combination of residential (approximately 80 multi-family residential units) and parking. As such, the Project would result in development of more residential units and residential population than planned for under the existing land use designation and zoning for the Project site.

As shown on Table IV.I-2, the Project's residential population and residential units would represent less than 1.0 percent of the of the projected growth that is anticipated to occur in the City between 2008 and 2020, 2020 and 2035, and 2008 and 2035. The Project's residential population and residential units represent approximately 5.5 percent and 2.2 percent (respectively) of the projected growth for the *South Los Angeles Community Plan* area between 2008 and 2020, 4.4 percent and 1.5 percent (respectively) between 2020 and 2035, and 0.02 percent and 0.93 percent (respectively) between 2008 and 2035. It is possible that some or all of the residential population associated with the Project could already reside in the City or in the *South Los Angeles Community Plan* area. In this case, the Project's residential population would not result in any net population growth for the City or Community Plan area. However, the Project's residential population would exceed the growth anticipated for Census Tract 1945.00 for all periods of time noted on the table. The Project's residential units would exceed the growth anticipated for Census Tract 1945.00 for the periods between 2008 and 2020 and 2020 and 2035, and would represent approximately 60 percent of the growth anticipated for the Census Tract between 2008 and 2035. Nonetheless, because the amount of residential units and residential population fall within the growth projections for the City and Community Plan area, the Project would not generate substantial population growth. Additionally, as discussed in Section IV.F (Land Use and Planning), the Project would be substantially consistent with the applicable policies of the Framework Element and RCP and consistent with all applicable policies of the Housing Element. Therefore, Project impacts related to population, housing, and employment would be less than significant.

**Table IV.I-2  
Change in Population, Housing, and Employment  
and Project Percentage of Change**

<b>City of Los Angeles/Los Angeles Subregion<sup>a</sup></b>						
<b>Years</b>	<b>Population</b>		<b>Households</b>		<b>Employment</b>	
	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>
2008 to 2020	221,200	0.22	145,800	0.09	82,500	0
2020 to 2035	328,900	0.15	170,900	0.08	89,100	0
<b>2008 to 2035</b>	<b>550,100</b>	<b>0.09</b>	<b>317,000</b>	<b>0.04</b>	<b>171,600</b>	<b>0</b>
<b>Community Plan<sup>a</sup></b>						
<b>Years</b>	<b>Population</b>		<b>Households</b>		<b>Employment</b>	
	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>
2008 to 2020	9,024	5.50	6,312	2.24	NA	NA
2020 to 2035	11,286	4.40	8,952	1.58	NA	NA
<b>2008 to 2035</b>	<b>20,310</b>	<b>0.02</b>	<b>15,264</b>	<b>0.93</b>	<b>NA</b>	<b>NA</b>
<b>Census Tract 1945.00<sup>a</sup></b>						
<b>Years</b>	<b>Population</b>		<b>Households</b>		<b>Employment</b>	
	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>	<b>Change</b>	<b>Project %</b>
2008 to 2020	116	>100.00	117	>100.00	94	0
2020 to 2035	152	>100.00	117	>100.00	82	0
<b>2008 to 2035</b>	<b>268</b>	<b>&gt;100.00</b>	<b>234</b>	<b>60.6</b>	<b>176</b>	<b>0</b>
<sup>a</sup> Refer to Table IV.I-1. NA = Not Available						

## CUMULATIVE IMPACTS

The related projects listed on Table II-1 in Section II (Environmental Setting) that include residential land uses would create 18,264 dwelling units. It is possible that some of the sites of these related projects already include residential land uses that would be removed with implementation of the related projects, and as such, the total net number of dwelling units that would be created would be less than 18,264. However, for a conservative analysis, it is assumed that all 18,264 dwelling units would be net new units. With the proposed Project, the number of cumulative dwelling units would be 18,406 net units, representing approximately 3.3 percent of the projected increase in housing units between the years 2008 and 2035.

According to the California Department of Finance Population and Housing Estimates, the City has an average of 2.966 persons per household.<sup>3</sup> Thus, the residential related projects and the proposed Project would generate a residential population of approximately 54,668.<sup>4</sup> As stated previously for the proposed Project, it is possible that some or all of the estimated 54,668 residents could already live in the City, and no net increase in the City's residential population would occur. However, assuming that all of the 54,668 residents were new to the City, this population would represent approximately 9.9 percent of the projected increase in the City's population between the years 2008 and 2035. Thus, cumulative growth associated with the proposed Project and the related projects would fall within the projected increase for housing and population growth for the City. None of the related projects are located within the *South Los Angeles Community Plan* area. As such, no cumulative increase in growth would occur as a result of the proposed Project and the related projects. Therefore, cumulative impacts related to population, housing, and employment would be less than significant.

## MITIGATION MEASURES

No significant impacts related to population, housing, and employment have been identified, and no mitigation measures are required.

## LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to population, housing, and employment would be less than significant.

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<sup>3</sup> California Department of Finance, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2001-10/view.php>, August 21, 2012.

<sup>4</sup>  $(18,264 \text{ DU} \times 2.966 \text{ persons per household} = 54,171 \text{ residents}) + (142 \text{ DU} \times 3.5 \text{ persons per household} = 497 \text{ residents}) = 54,668 \text{ residents}$ .

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### J. PUBLIC SERVICES

#### 1. FIRE

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#### ENVIRONMENTAL SETTING

##### **Regulatory Setting**

The City of Los Angeles Fire Department (LAFD) provides fire prevention, fire suppression, and life safety services in the City of Los Angeles (the “City”). The 1979 Fire Protection and Prevention Plan (FPPP), an element of the City’s *General Plan* (the “*General Plan*”), as well as the City’s Fire Code (the “Fire Code”) Section (Article 7 of Chapter V, Public Safety and Protection) of the Los Angeles Municipal Code (LAMC), govern the activities of LAFD. The Fire Code prescribes laws for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use or occupancy of buildings, structures, or premises, and such other laws as it may be LAFD’s duty to enforce.<sup>1</sup> The FPPP and the Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City. Policies and programs addressed in these documents include: (1) fire station distribution and location; (2) required fire-flow (i.e., water supply and pressure); (3) fire hydrant standards and locations; (4) access provisions; and (5) emergency ambulance service.

##### ***Response Distance***

LAFD has indicated that the distance of a project site to the nearest fire station is the primary indicator of the department’s ability to provide adequate services. The Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies, based on land use and fire-flow requirements. Section 57.09.06 of the Fire Code, Table 9-C, states that the maximum response distance from an engine company or a truck company to a high density residential and commercial neighborhood area is 1.5 miles. When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.) deemed necessary by the Fire Chief.

##### ***Response Time***

Response time relates directly to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and LAFD’s ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time LAFD arrives at the scene. LAFD’s preferred response time is to arrive at the scene of all types of

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<sup>1</sup> Fire Code §57.01.02, Amended in Entirety, Ordinance Number 162,123, Effective May 12, 1987.

emergencies within five minutes at 90 percent of the time or better, and have an advanced life support (ALS) unit arrive to all high risk medical incidents within eight minutes at 90 percent of the time or better.<sup>2</sup>

### ***Emergency Access***

Emergency vehicle access to the Project Site is provided from local roadways. Important roadways in the vicinity of the Project site include Crescent Heights Boulevard, Fairfax Avenue, Stanley Avenue, Beverly Boulevard, and 3<sup>rd</sup> Street. Direct access to the Project site is provided via Beverly Boulevard and Fairfax Avenue. Further, a paved public alleyway borders the Project site to the west that may also provide direct access if necessary. All development in the City must comply with access requirements of the City's Building and Safety Department and the LAFD.

### ***Fire-Flow***

The City's Department of Water and Power (LADWP) provides water supply to meet fire-flow requirements in the City. Fire-flows are supplied by the same water mains as the domestic water system, including the lines located in local streets and major roadways. In general, fire-flow requirements are closely related to land use, as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City fire-flow requirements, as established in Fire Code Section 57.09.06, vary from 2,000 gallons per minute (gpm) in low-density residential areas, to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.<sup>3</sup>

### ***Existing Conditions***

LAFD currently has approximately 3,586 uniformed personnel and 353 non-uniformed support staff.<sup>4</sup> Services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,104 firefighters (including 242 paramedic-trained personnel) is on duty at all times throughout the neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.<sup>5</sup>

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<sup>2</sup> E-mail correspondence with Mark R. Woolf, Captain I-Paramedic, LAFD, Planning and Research Division, October 2, 2009.

<sup>3</sup> City of Los Angeles Fire Code §57.09.06 A.2.

<sup>4</sup> LAFD, About the Los Angeles Fire Department, website: <http://lafd.org/about.htm>, accessed October 2, 2009.

<sup>5</sup> Ibid.

LAFD is organized into three geographic divisions, which consist of a cumulative 16 battalions that oversee 106 neighborhood fire stations. The Project site is located within Division 2, which covers a 107 square-mile region consisting of the southern and western areas of the City. The division is apportioned among five battalions (numbers 3, 4, 6, 13, and 18) of which include a cumulative 35 neighborhood fire stations.

Within an approximately two-mile radius of the Project site, LAFD Fire Stations 10, 13, and 15 are the closest. Information about these stations is provided on Table IV.J-1.

**Table IV.J-1**  
**Existing Fire Stations Serving the Project Site**

<b>Station No.</b>	<b>Location</b>	<b>Equipment</b>	<b>Distance to Project Site (miles)</b>	<b>Response Time to Project Site (minutes)</b>
10	1335 South Olive Street	<ul style="list-style-type: none"> <li>• Light Force (Truck and Engine Co)</li> <li>• Fire Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• Basic Life Support Rescue Ambulance</li> <li>• Staff of 14 at all times</li> </ul>	1.2	4.8
13	2401 West Pico Boulevard	<ul style="list-style-type: none"> <li>• Fire Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• Battalion Command Team</li> <li>• EMS Battalion Captain</li> <li>• Staff of 9 at all times</li> </ul>	1.3	5.0
15	915 West Jefferson Boulevard	<ul style="list-style-type: none"> <li>• Paramedic Assessment Light Force (Truck and Engine Co)</li> <li>• Fire Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• Paramedic Rescue Ambulance</li> <li>• Staff of 14 at all times</li> </ul>	1.4	5.2

*Source: William Wells, Captain II-Paramedic, LAFD, Planning and Research Division, April 7, 2009.*

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

#### ***CEQA Guidelines***

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the following were to occur:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.

### ***L.A. CEQA Thresholds Guide***

The *L.A. CEQA Thresholds Guide*, the determination of significance levels for project impacts on fire protection services shall be made on a case-by-case basis considering the following factor:

1. If the project requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

### **Project Impacts**

As discussed in Section IV.A (Impacts Found to be Less Than Significant [Population & Housing]), the Project would introduce approximately 421 new residents to the Project site. It should be noted that it is possible that some or all of these residents could already reside in the Project area or City with an existing demand for fire protection services that would not be increased with implementation of the Project. As discussed previously, LAFD has indicated that distance to the nearest fire station is the primary indicator of LAFD's ability to provide adequate services. As shown on Table IV.J-1, the Project site is within an approximately 2.0-mile radius of LAFD Fire Stations 10, 13, and 15. The response distance from these fire stations meets LAMC and LAFD recommendations. The Project would not substantially affect response times to the site. Further, conformance with applicable Fire Code policies, in conjunction with the proximity of the Project site to area fire stations, would ensure adequate on-site fire protection, and construction of new facilities or expansion of existing facilities would not be required to serve the Project. Therefore, Project impacts related to fire protection services would be less than significant.

### **CUMULATIVE IMPACTS**

As discussed previously, the Project site is served by Fire Stations 10, 13, and 15. Of the 49 related projects listed on Table II-1 (refer to Section II [Environmental Setting]), Fire Station 10 is the primary station for 25 related projects (Related Project Nos. 1, 3, 5, 6, 10, 13, 16, 18, 19, 26, 28-30, 33-36, 41, 42, 44, 45, 47, and 48); Fire Station 13 is the primary station for 2 related project (Related Project Nos. 32 and 40); and Fire Station 15 is the primary station for 7 related projects (Related Project No. 14, 23, 25, 31, 34, 38, and 46). Many of the sites of the related projects are already developed with existing land uses that reflect an existing demand for fire protection services. However, implementation of some of these related projects could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. It should be noted that, similar to the proposed Project, the residents and employees associated with the related projects could already live/work in the vicinity of the related projects or the City with an existing demand for fire protection services and would not create an increased demand for such services with implementation of the related projects. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not

limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through this process, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. On this basis, it is anticipated that cumulative impacts to fire protection would be less than significant. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute.

## **MITIGATION MEASURES**

No significant impacts related to fire protection services have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- J-1: During demolition and construction, LAFD access from major roadways and internal roadways shall remain clear and unobstructed.
- J-2: The Project Applicant shall submit a plot plan to the LAFD prior to occupancy of the Project, for review and approval, which shall provide the capacity of the fire mains serving the Project site. Any required upgrades shall be identified and implemented prior to occupancy of the Project.
- J-3: The design of the Project site shall provide adequate access for LAFD equipment and personnel to the structure.
- J-4: No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel, except for dwelling units, where travel distances shall be computed to the front door of the unit.
- J-5: The applicant shall submit plot plans for LAFD approval of access and fire hydrants.
- J-6: The Project shall provide adequate off-site public and on-site private fire hydrants.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to fire protection services would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### J. PUBLIC SERVICES

#### 2. POLICE

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#### ENVIRONMENTAL SETTING

The Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police services to the Project site and immediate Project vicinity. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. The Project site is located in the South Bureau that contains the following community police stations: 77<sup>th</sup> Street, Harbor, Southeast, and Southwest. The Southwest Community Police Station, located at 1546 West Martin Luther King Jr. Boulevard, serves the Project site and surrounding area. The Southwest area covers approximately 13.11 square miles, bordered by Interstate 10 (the “Santa Monica Freeway”) to the north, Interstate 110 (the “Harbor Freeway”) to the east, Vernon Avenue to the south, and La Cienega Boulevard to the west. Crime statistics for the Southwest area are provided on Table IV.J-2.

**Table IV.J-2**  
**Crime Statistics for Southwest Area**

Type of Crime	YTD 2011	YTD 2010	% Change
Homicide	16	11	45
Rape	29	48	-40
Robbery	726	729	< -1
Aggravated Assaults	535	598	-11
Burglary	797	902	-12
Grand Theft Auto	685	707	-3
Burglary Theft From Vehicle	841	1,036	-19
Personal/Other Theft	1,298	1,387	-6
<b>Total</b>	<b>4,927</b>	<b>5,418</b>	<b>-9</b>
<i>Source: LAPD Compstat, Southwest Area profile and LAPD Compstat Citywide profile, September 2011.</i>			

Per capita, the LAPD is the smallest big-city police department in the country. In 2006, the LAPD fielded one officer for every 426 residents, compared with New York City, which has one officer per 228

residents, and Chicago, with one officer for every 216 residents.<sup>6</sup> Upon entering office in 2005, Mayor Antonio Villaraigosa announced a goal to hire an additional 1,000 officers over the next five years. By October 2009, the number of active-duty sworn officers deployed reached 9,982.<sup>7</sup> Based on the recently released 2010 population count of 3,792,621 by the U.S. Census Bureau, this puts the police-officer-per-capita ratio in the City at approximately one officer per 383 residents. The Southwest Community Police Station has 352 sworn personnel and 32 civilian personnel that serve approximately 165,000 residents in the communities of Baldwin Village, Baldwin Vista, Crenshaw, Jefferson Park, Leimert Park, West Adams, and University Park.<sup>8</sup> The Southwest Community Police Station has a police-officer-per-capita ratio of approximately one officer per 469 residents.

Unlike fire protection services, police units are often in a mobile state; hence actual distance between a headquarters facility and the Project site is often of little relevance. Instead, the number of officers on the street is more directly related to the realized response time. Response time is defined as the total time from when a call requesting assistance is placed until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project may have a significant environmental impact if the following were to occur:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.

#### *L.A. CEQA Thresholds Guide*

Based on criteria established in the *L.A. CEQA Thresholds Guide*, the determination of levels of significance for a project's impacts on police services shall be made on a case-by-case basis, considering the following factors:

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<sup>6</sup> Lim, N., Matthies, C., Ridgeway, G., Gifford, B. (2009). *To Protect and To Serve: Enhancing the Efficiency of LAPD Recruiting*. The Rand Corporation.  
[http://www.rand.org/content/dam/rand/pubs/monographs/2009/RAND\\_MG881.pdf](http://www.rand.org/content/dam/rand/pubs/monographs/2009/RAND_MG881.pdf)

<sup>7</sup> Office of the Mayor Antonio Villaraigosa "More Cops. Less Crime" Press release. Retrieved 2011-04-26.

<sup>8</sup> Los Angeles Police Department website:  
[http://www.lapdonline.org/southwest\\_community\\_police\\_station/content\\_basic\\_view/1639](http://www.lapdonline.org/southwest_community_police_station/content_basic_view/1639), June 2013.

1. The population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area;
2. 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
3. Whether the project includes security and/or design features that would reduce the demand for police services.

### ***Discussion of Significance Thresholds***

The determination of whether the Project would require the expansion of existing police facilities or construction of new facilities (i.e., result in a potentially significant impact on police services) will be made by considering the three factors listed under the *L.A. CEQA Thresholds Guide*.

### **Project Impacts**

As discussed in Section IV.H (Population & Housing), the Project would introduce approximately 421 residents to the Project site. It is possible that some or all of the 421 residents could already live in the Project area or City with an existing demand for police protection services that would not be increased with implementation of the Project. However, assuming that the 421 residents would be new to the Southwest Community Police Station's service area, the Project would increase the existing police-officer-per-capita ratio of approximately one officer per 469 residents to one officer per 470 residents.

According to the LAPD, the Project could have a moderate impact on police services in the Southwest Community Police Station's service area.<sup>9</sup> The LAPD recommends that the Project Applicant coordinate with the Crime Prevention section of the LAPD regarding appropriate crime prevention measures that should be incorporated into the design of the Project. On completion of Project construction, the Project Applicant shall provide the Southwest Community Place Station a copy of the Project's site plan, including access routes and any additional information that might facilitate police response to any emergency calls from the Project site. Through coordination with the LAPD and incorporation of crime prevention measures, the Project would minimize demand for police services and would not require the need for new or altered police facilities. Therefore, Project impacts would be less than significant.

### **CUMULATIVE IMPACTS**

Implementation of some of the related projects listed on Table II-1 could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for police

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<sup>9</sup> Los Angeles Police Department, Steven Zipperman, Captain, August 13, 2009 (refer to Appendix IV.J).

protection services. It should be noted that, similar to the proposed Project, the residents and employees associated with the related projects could already live/work in the vicinity of the related projects or the City with an existing demand for police services and would not create an increased demand for such services with implementation of the related projects. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the site plan review, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through this process, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. On this basis, it is anticipated that cumulative impacts to police protection services would be less than significant. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute.

## **MITIGATION MEASURES**

No significant police service impacts were identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- J-7: The Project design shall address access control to proposed structures including parking areas, proposed security lighting, landscaping planning and minimization of dead space to eliminate areas of concealment, and provision of security patrol throughout the project site if needed. *The Design Out Crime Guidelines: Crime Prevention Through Environmental Design*, published by LAPD, shall be used for reference. All crime prevention features shall be reviewed and approved by LAPD prior to the issuance of a building permit.
- J-8: Upon completion of the Project, the applicant shall provide LAPD's Southwest Community Police Station's Commanding Officer with a diagram of all portions of the Project site that includes access routes and any other applicable information that may facilitate police response.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts on police protection services would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### J. PUBLIC SERVICES

### 3. SCHOOLS

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#### ENVIRONMENTAL SETTING

The City of Los Angeles Unified School District (LAUSD) is the primary operator of public schools in the City. LAUSD is divided into eight local districts. LAUSD schools that currently serve the Project site are shown on Table IV.J-3, which includes the location, 2009-2010 enrollments, enrollment capacities, and number of students above or below capacity for each of these schools.

**Table IV.J-3**  
**LAUSD Schools Near the Project Site**

Name	Location	Enrollment	Design Capacity	+/- Capacity
Norwood Elementary <sup>1</sup> (K-5)	2020 Oak Street	713	894	-152
Downtown Value Elementary <sup>2</sup> (K-8)	950 W. Washington Blvd.	396	460	-64
Adams Middle <sup>1</sup> (6-8)	151 West 30 <sup>th</sup> Street	1,437	2,179	-742
Richard Merkin Middle School <sup>2</sup> (6-8)	2023 S. Union Avenue	472	475	-3
New Designs Charter School <sup>2</sup> (6-12)	2303 Figueroa Way	690	800	-110
West Adams Preparatory High <sup>1</sup> (9-12)	1500 W. Washington Blvd.	2,635	2,529	+106
Gertz-Ressler High School <sup>2</sup> (9-12)	2023 S. Union Avenue	534	550	-16
<sup>1</sup> School currently serves the Project site. <sup>2</sup> Charter School Source: Written correspondence with Glenn Striegler, Environmental Assessment Coordinator, LAUSD, August 3, 2009, and LAUSD: <a href="http://search.lausd.k12.ca.us/cgi-bin/fccgi.exe?w3exec=schfinder0">http://search.lausd.k12.ca.us/cgi-bin/fccgi.exe?w3exec=schfinder0</a> , September 2011.				

#### Open Enrollment Policy

Pursuant to Assembly Bill (AB) 149 and AB 2071, the State of California mandates an open enrollment policy that enables students anywhere within LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular



school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.<sup>10</sup>

### **Charter Schools**

As noted on Table IV.J-3, four charter schools operate in the vicinity of the Project site and are under the jurisdiction of the LAUSD. The schools are mandated by the State under the Open Enrollment Policy to accept students living within the school's district. Thus, the schools have been included in the discussion of potential impacts to LAUSD schools.

### **School Facilities Fees**

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.<sup>11</sup>

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The payment of the fees pursuant to SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws (Government Code Section 65996).

Pursuant to Section 65995.5-7 of the Government Code, LAUSD's current Developer Fees for development within LAUSD boundaries are: 1) \$3.87 per square foot of new residential construction; 2) \$0.47 per square foot of commercial/industrial uses; 3) \$0.28 per square foot of self-storage uses; and 4) \$0.09 per square foot of parking structure uses.<sup>12</sup>

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<sup>10</sup> News Release, LAUSD, Office of Communications, April 17, 2000.

<sup>11</sup> LAUSD, School Facilities Fee Plan, March 2, 2002.

<sup>12</sup> LAUSD, Developer Fee Program Office, 2010 Developer Fee Rates.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project may have a significant environmental impact if the following were to occur:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.

#### *L.A. CEQA Thresholds Guide*

Based on criteria established in the *L.A. CEQA Thresholds Guide*, the determination of significance for a project's impacts on school services shall be made on a case-by-case basis, considering the following factors:

1. The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
2. 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;
3. 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
4. Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

#### *Discussion of the Significance Thresholds*

The determination of whether the Project would require the expansion of existing schools or construction of new facilities (i.e., result in a potentially significant impact on school services) will be made by considering the four factors listed under the *L.A. CEQA Thresholds Guide*.

## Project Impacts

As indicated on Table IV.J-4 the proposed residential uses would generate an estimated 57 students (29 elementary students, 14 middle school students, and 14 high school students). It should be noted that it is possible that some of the students generated by the Project already reside in the area served by LAUSD and are already enrolled in LAUSD schools and would not create an increased demand for school services with implementation of the Project. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to LAUSD. As shown on Table IV.J-4, the elementary and middle schools that would serve the Project could adequately accommodate the additional 29 and 14 students, respectively. West Adams Preparatory High School is operating over capacity, and attendance of the Project's 14 high school students at this school would further increase the school's deficiency. However, it is possible that the Project's 14 high school students could attend New Designs Charter School or Gertz-Ressler High School, both of which have adequate capacity to accommodate the Project's generation of 14 high school students. Nonetheless, pursuant to SB 50, payment of the school fees established by LAUSD, in accordance with existing rules and regulations regarding the calculation and payment of such fees, would by law, mitigate the Project's direct and indirect impacts on schools. Therefore, Project impacts on school services would be less than significant.

**Table IV.J-4**  
**Estimated Project Student Generation**

Land Use	Size	Elementary	Middle	High	Total
Residential	142 du	29	14	14	57
Commercial (removed)	12,335 sf	0	0	0	0
<b>Total</b>		<b>29</b>	<b>14</b>	<b>14</b>	<b>57</b>
<i>Note: sf = square feet; du = dwelling unit</i> <i>Source: LAUSD, School Facilities Needs Analysis, 2006.</i> <i>Multi-family: 0.2042 elementary (K-5), 0.0988 middle (6-8), and 0.0995 high (9-12) students per dwelling unit.</i> <i>Commercial/retail/restaurant: 0.0149 elementary (K-5), 0.0069 middle (6-8), and 0.0067 high (9-12) student per 1,000 square feet.</i>					

## CUMULATIVE IMPACTS

Of 49 related projects, four related projects (#'s 14, 23, 36, and 46) would be served by the same elementary school as the Project; six related projects (#'s 14, 23, 35, 36, and 46) would be served by the same middle school; and three related projects (#'s 23, 32, and 40) would be served by the same high.<sup>13</sup> As shown on Table IV.J-5, the Project and related projects would generate approximately 425 elementary school students, 244 middle school children, and 30 high school students.

<sup>13</sup> LAUSD, <http://search.lausd.k12.ca.us/cgi-bin/fccgi.exe?w3exec=schfinder0>, June 2013.

**Table IV.J-5  
Cumulative Student Generation**

Related Project			Elementary School Children	Middle School Children	High School Children
#14	Apartment Retail	1,500 du 40,000 GLSF	306 <u>1</u> <b>307</b>	148 <u>1</u> <b>149</b>	NA
#23	Apartment	145 du	29	14	14
#32	Office Assembly Hall	30,300 GSF 4,500 GSF	NA	NA	<1 <u>&lt;1</u> <b>&lt;2</b>
#35	Apartment Retail Restaurant	357 du 7,750 GLSF 7,750 GSF	NA	35 <1 <u>&lt;1</u> <b>37</b>	NA
#36	Condominium Retail	291 du 7,134 GLSF	59 <u>&lt;1</u> <b>60</b>	29 <u>&lt;1</u> <b>30</b>	NA
#40	Public Elementary School	450 Students	NA	NA	NA
#46	Child Care Center	114 Students	NA	NA	NA
<i>Proposed Project</i>			29	14	14
<b>Total</b>			<b>425</b>	<b>244</b>	<b>30</b>
<i>du = dwelling unit    GLSF = gross leasable square feet    GSF = gross square feet</i> <i>Student Generation Rate Source: LAUSD, School Facilities Needs Analysis, 2006. Multi-family: 0.2042 elementary (K-5), 0.0988 middle (6-8), and 0.0995 high (9-12) students per dwelling unit. Commercial/retail/restaurant: 0.0149 elementary (K-5), 0.0069 middle (6-8), and 0.0067 high (9-12) student per 1,000 square feet.</i>					

Similar to the Project, it is likely that some of the students generated by the related projects would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all the students generated by the related projects would be new to the LAUSD. The elementary and middle schools serving the Project and the referenced related projects would have adequate capacity to serve cumulative student generation. However, cumulative student generation would contribute to the over-capacity enrollment at Norwood Elementary School and West Adams Preparatory Senior High School. Nonetheless, the applicants of the related commercial and residential projects would pay required developer school fees to the LAUSD (pursuant to SB 50) to reduce any impacts the related projects could have on school services. The provisions of SB 50, discussed above, are deemed to provide full and complete mitigation of school facilities impacts. The payment of these fees by the related projects would be mandatory and would ensure that cumulative impacts on school services would be less than significant.

## **MITIGATION MEASURES**

No significant impacts to school services have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measure:

J-9: The Project Applicant shall pay school fees to the LAUSD.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts on school services would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### J. PUBLIC SERVICES

#### 4. PARKS

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#### ENVIRONMENTAL SETTING

##### Existing Conditions

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. LADRP facilities include over 15,600 acres of parkland, 400 neighborhood and regional parks, over 184 recreation and community centers, 61 swimming pools, 11 lakes, 7 camps, two beaches, and an urban forest.<sup>14</sup> Within the South Los Angeles Community Plan area, LADRP operates 20 parks, primarily including regional, community and neighborhood parks.<sup>15</sup> Ideally, neighborhood parks are 5 to 10 acres in size, have a service radius of approximately one-half mile, and are pedestrian-accessible without crossing a major arterial street or highway/freeway. Community parks are ideally 15 to 20 acres, have a service radius of two miles, and are easily accessible to the area served. Regional parks in the City are ideally greater than 50 acres, provide specialized recreational facilities and/or attractions, and have a service radius encompassing the entire Los Angeles region.

The Jesse Owens County Park is a 20-acre park and is the only Regional Park located within the South Los Angeles Community Plan area. Five community parks serve the South Central Community Plan area and include Exposition Park and Recreation Center, Harvard Recreation Center, Hoover Recreation Center, M.L. King Jr. Park, the Algin Sutton Recreation Center. These community parks range in size from 2.42 acres to 20.78 acres. Thirteen neighborhood parks, ranging in size from 0.11 acre to 8.54 acres, are located in the South Los Angeles Community Plan area and include the 38<sup>th</sup> Place/Normandie Park, 48<sup>th</sup> Street Park, Chesterfield Square Park, Denker Recreation Center, Hoover/Gage Park, St. James Park, Little Green Acres Park, Loren Miller Recreation Center, Mount Carmel Park, Normandie Recreation Center, Pico Union Park, St. Andrews Recreation Center, and the Vermont Square Park.

The parks and recreational facilities located within two miles of the Project site are shown on Table IV.J-6 and on Figure IV.J-1. Other regional recreational opportunities and open space areas located within 15

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<sup>14</sup> LADRP, Department, Who We Are, website: <http://www.laparks.org/dos/dept/who.htm>, accessed October 5, 2009.

<sup>15</sup> City of Los Angeles Department of City Planning, General Plan, Land Use Element, South Los Angeles Community Plan, Recreation and Park Facilities, Adopted March 2000, website: <http://cityplanning.lacity.org/complan/pdf/sclcptxt.pdf>.

miles of the Project site include beaches, Griffith Park, Topanga State Park, and the Angeles National Forest.

**Table IV.J-6  
LADRP Facilities Serving the Project Site**

<b>Facility</b>	<b>Facility Features</b>	<b>Approximate Distance to Project Site (miles)</b>
<b>Parks</b>		
Pico Union Park (Neighborhood Park) <sup>1</sup> 1827 S. Hoover Street	Children's play area, picnic tables	0.46
Saint James Park (Neighborhood Park) Adams Boulevard & Severance Street	Children's play area	0.49
Alvarado Terrace Park <sup>1</sup> Malvern Avenue & Alvarado Terrace	Children's play area, gazebo	0.60
La High Memorial Park <sup>1</sup> 4625 West Olympic Boulevard	Children's play area	0.90
Hope and Peace Park (Pocket Park) <sup>1</sup> 843 S. Bonnie Brea Street	Basketball hoop, benches	1.10
Macarthur Park <sup>1</sup> 2230 W. 6 <sup>th</sup> Street	Children's play area, paddle boats, picnic area, walking path	1.60
Lafayette Park <sup>1</sup> 625 S. La Fayette Park Place	Auditorium, basketball courts (lighted/outdoor), children's play area, community room, picnic tables, soccer field (lighted), tennis courts (lighted)	1.75
Seoul International Park <sup>1</sup> 3250 San Marino Street	Children's play area, picnic tables, auditorium, baseball diamond (lighted), indoor gym (without weights), jogging path, kitchen, patio, stage	1.83
Curtis Roland Park 1287 W. 38 <sup>th</sup> Place		1.90
Ramona Gardens Park 2800 Flower Street	Children's play area, basketball courts (lighted/outdoor), handball courts (unlighted), tennis courts (lighted), volleyball courts (lighted)	1.93
<b>Recreation Centers</b>		
Toberman Recreation Center 1725 Toberman Street <sup>1</sup>	Auditorium, barbecue pits, baseball diamond (lighted), basketball courts (lighted/outdoor), children's play area, community room, indoor gym (without weights), picnic tables	0.15
Hoover Recreation Center (Community Park) 1010 W. 25 <sup>th</sup> Street	Auditorium, barbecue pits, basketball courts (unlighted/outdoor), children's play area, indoor gym (with weights),	0.41

**Table IV.J-6  
LADRP Facilities Serving the Project Site**

<b>Facility</b>	<b>Facility Features</b>	<b>Approximate Distance to Project Site (miles)</b>
	picnic tables.	
Trinity Recreation Center (Class Park) 2416 Trinity Street <sup>2</sup>	Auditorium, basketball courts (lighted/outdoor), children's play area	1.28
Normandie Recreation Center (Class Park) 1550 S. Normandie Avenue <sup>1</sup>	Auditorium, baseball diamond (lighted), basketball courts (lighted/indoor), basketball courts (lighted/outdoor), children's play area, community room, handball courts (lighted), picnic tables	1.38
Loren Miller Recreation Center (Neighborhood Park) 2717 Halldale Avenue	Basketball courts (lighted/outdoor), children's play area, picnic tables, tennis courts (lighted)	1.52
MacArthur Park Recreation Center 2230 W. 6 <sup>th</sup> Street <sup>1</sup>	Auditorium, children's play area, picnic tables	1.60
Lafayette Multipurpose Community Center 625 S. La Fayette Park Place <sup>1</sup>	Auditorium, basketball courts (lighted/outdoor), children's play area, community room, picnic tables, soccer field (lighted), tennis courts (lighted)	1.75
Denker Recreation Center (Neighborhood Park) 1550 W. 35 <sup>th</sup> Place	Baseball diamond (lighted), basketball courts (lighted/indoor), children's play area, community room, indoor gym (without weights), picnic tables, restroom(s), soccer field (lighted)	1.80
Ardmore Recreation Center (Class Park) 3250 San Marino Street <sup>1</sup>	Auditorium, baseball diamond (lighted), children's play area, indoor gym (without weights), picnic area	1.83
Expo Center (Community Park) Roy A. Anderson Recreation Center 3980 S. Menlo Avenue		1.86
Central Park Recreation Center 1357 E. 22 <sup>nd</sup> Street <sup>2</sup>	Basketball courts (lighted/indoor), children's play area	1.89
Lake Street Community Center <sup>3</sup> 227 N. Lake Street	A gymnasium, adjacent staging area, and a Universal Access (UA), playground planned for this site.	2
<b>Senior Citizen Centers</b>		
Betty Hill Senior Citizen Center 3570 S. Denker Avenue	Auditorium, club room, game room, kitchen, stage, TV area	1.8
Ahmanson Senior Citizen Center 3990 S. Menlo Avenue	Ballroom, computer room, enclosed patio, game room, kitchen, senior cafe	1.89
<b>Aquatic Centers</b>		



**Table IV.J-6  
LADRP Facilities Serving the Project Site**

<b>Facility</b>	<b>Facility Features</b>	<b>Approximate Distance to Project Site (miles)</b>
Central Pool 1357 E. 22 <sup>nd</sup> Street <sup>2</sup>	Seasonal pool (outdoor/unheated)	1.89
LA84 Foundation/AAF John C. Argue Swim Stadium 3990 Menlo Avenue	Year-round pool (outdoor/heated), lap pool (open year round/outdoor/heated, 50 meters x 25 yards), shallow wading pool (open year round/outdoor/heated, 0 depth, water-play features)	1.89
<sup>1</sup> Park located to the north of the Santa Monica Freeway. Accessible from the Project site via Washington Boulevard. <sup>2</sup> Park located to the east of the Harbor Freeway. Accessible from the Project site via Washington Boulevard. <sup>3</sup> Park located to the north of the Santa Monica Freeway. Accessible from the Project site via Washington Boulevard and/or the Harbor Freeway. Source: List based on LADRP, Facility Locator, website: <a href="http://raponline.lacity.org/maplocator/">http://raponline.lacity.org/maplocator/</a> , September 2011.		

## **Regulatory Framework**

### ***State Quimby Act***

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to the state's rapid urbanization and the decreasing number of parks and recreational facilities. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. The Quimby Act also states that the dedication of land, or payment of fees, or both, shall not exceed a maximum of three acres of park area per 1,000 project residents.

### ***City of Los Angeles General Plan***

The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. Adopted in 1980, the PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities.

Source: Google Maps and City of Los Angeles, 2008.

Figure IV.J-1  
Park and Recreation Center Locations

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The PRP states that the location and allocation of acreage for neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, and a minimum two acres per 1,000 persons for community parks with a service radius of two miles. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two mile service radius for community parks. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need for parks or recreational facilities is diminished due to population and/or land use changes.

### ***City of Los Angeles Municipal Code (LAMC)***

In addition to the standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections 12.21 and 17.12 of the Los Angeles Municipal Code (LAMC).

### ***The Quimby Code***

To implement the State Quimby Act, the City established the Subdivision Fees Trust (LAMC Section 17.12) in 1971. A separate park impact fee, the Zone Change Park Fee (LAMC Section 12.33), which applies to the finalization of zone changes for multi-unit residential projects, including rental projects, was established by the City in 1985. The fee schedule, collection, and administration of the Subdivision Fees Trust and the Zone Change Park Fee program are identical. Together these sections are colloquially referred to as the City's "Quimby Code."<sup>16</sup>

Pursuant to Los Angeles Municipal Code Section 17.12, most residential development projects requesting a subdivision or a zone change are required, as a condition of approval of the project, to either dedicate land for recreation and park purposes or pay a fee in-lieu (Quimby Fees). The area of land within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the site is located. The alternative in-lieu fee is calculated on a per-unit (for condominiums) or per-lot basis, with the amount of the fee dependent on the zoning of property. Pursuant to LAMC Section 17.12.B, the percentage of gross subdivision area required to be dedicated for park and recreation purposes ranges from 0.9 percent (for subdivisions with a net density of one dwelling unit per acre) to 32.0 percent (for subdivisions with a net density of 100 dwelling units per acre or more). Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities, which would reasonably serve each residential project. In subdivisions containing more than 50 dwelling units, the City allows developers to dedicate parkland in lieu of paying fees.

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<sup>16</sup> Recreation and Parks Department Web site, "Quimby Program Frequently Requested Information," accessed April 29, 2011: <http://www.laparks.org/planning/quimby.htm>



Section 17.12 of the LAMC also allows recreation areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities.

#### *Dwelling Unit Construction Tax*

Pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on all construction of new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax may be reduced accordingly.

#### *City Code-Required Open Space*

LAMC Section 12.21.G provides minimum standards for the amount of "open space" that residential development projects should provide on-site. Open space includes both common and private green space and recreational amenities that meet specific standards. However, not all areas designated as open space in LAMC would be classified as park or recreational facilities under the City's Quimby and Dwelling Unit Construction Tax programs (discussed above), the Framework Element, or by LADRP.

Pursuant to LAMC Section 12.21.G, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having fewer than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space is defined as area that is designed and intended for use as active or passive recreation. Usable open space may consist of private and/or common area open space. Common open space areas must be a minimum of 400 square feet with no horizontal dimension less than 15 feet when measured perpendicular from any point on each of the boundaries of the open space area, be readily accessible to all the residents of the site, and must constitute at least 50 percent of the total open space provided. Private open space must be contiguous to and immediately accessible from a single dwelling unit, enclosed by a solid fence at least four feet in height, have no horizontal dimension less than eight feet when measured perpendicular from any point on each of the boundaries of the open space area, and contain a minimum of 100 square feet, of which no more than 100 square feet per dwelling unit shall be attributable to the total required open space. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees and at least one 24-inch box tree is required for every four dwelling units.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project may have a significant environmental impact if the following were to occur:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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 and recreation.

#### *L.A. CEQA Thresholds Guide*

Based on criteria established in the *L.A. CEQA Thresholds Guide*, the determination of significance for a project's impacts on parks and recreation shall be made on a case-by-case basis, considering the following factors:

1. The net population increase resulting from the proposed project;
2. 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
3. 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).

### Project Impacts

As shown on Table IV.J-7, based on LAMC open space standards, the Project would be required to include a minimum of 23,250 square feet of open space. The Project includes approximately 21,722 square feet of public/common open space and approximately 13,440 square feet of private open space, consisting of private patios and balconies, a total of 35,163 square feet of open space, exceeding the LAMC standard by 11,913 square feet.

**Table IV.J-7  
Open Space Required of and Provided by the Project**

<b>Open Space Requirement</b>	<b>Project Units</b>	<b>Total Open Space Required</b>
3 habitable rooms = 125 sf/du	32 du	4,000 sf
≥3 habitable rooms = 175 sf/du	110 du	19,250 sf
	<i>Total Required</i>	<i>23,250 sf</i>
	<b>Total Provided</b>	<b>35,163 sf</b>
<i>sf = square feet    du = dwelling unit</i>		

The Project would consist of 142 residential units, which would generate an estimated 497 residents. The standard minimum parkland-to-population ratio, provided in the City's General Plan Framework Element, is two acres of parkland per 1,000 residents generated. Therefore, implementation of the Project would require approximately 0.994 acre of parkland.<sup>17</sup> However, the Project Applicant shall pay all required parkland fees pursuant to the LAMC, including, in consultation with the City of Los Angeles Department of Recreation and Parks, the Project Applicant shall be required to comply with one or more of the following: 1) dedicate two acres of parkland per 1,000 residents, 2) pay in-lieu fees for any land dedication requirement shortfall, or 3) provide on-site improvements equivalent in value of the in-lieu fees, or any portion thereof. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

## CUMULATIVE IMPACTS

A cumulative increase in demand for park and recreational facility services could occur with the development of the Project and the related residential projects identified in Section II, Environmental Setting. It should be noted that, similar to the proposed Project, the residents and employees associated with the related projects could already live/work in the vicinity of the related projects or the City with an existing demand for parks and recreational services and would not create an increased demand for such services with implementation of the related projects. Employees generated by the commercial projects and the commercial portions of mixed-use projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational services. Therefore these project-generated employees would not contribute to the future demand on park and recreational services.

The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of these projects would be subject open space requirements of the LAMC and to the Quimby fee and/or Dwelling Unit Construction Tax requirements, similar to the applicant of the proposed Project, ensuring that any potential impacts to parks and recreational facilities created by the related projects would not be significant. As stated previously, Project impacts to parks and recreational

<sup>17</sup>  $[(497 \text{ residents}) \div (1,000)] = 0.497 \text{ thousand residents. } [(2 \text{ acres of parkland}) \times (0.497 \text{ thousand residents})] = 0.994 \text{ required acre.}$

facilities would be less than significant. Therefore, the Project would not contribute to significant cumulative impacts to park and recreational facilities.

### **MITIGATION MEASURES**

No significant impacts related to parks and recreational services have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measure:

J-10:           The Project applicant shall pay all applicable fees associated with the construction of the Project, including, but not necessarily limited to, Quimby fees.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts on park and recreational services would be less than significant.



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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### J. PUBLIC SERVICES

#### 5. LIBRARIES

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#### ENVIRONMENTAL SETTING

The City of Los Angeles Public Library (LAPL) provides library services throughout the City. LAPL facilities include the Richard J. Riordan Central Library located in the City's downtown area, 7 regional branches, and 64 community branches throughout the City. LAPL maintains a collection of approximately six million books and other materials, public computers, and three million photographs.<sup>18</sup> According to the *General Plan*, LAPL facilities serve the City by mandating certain facility sizes based on service population and have a maximum service radius of two miles.<sup>19</sup>

The Exposition Park Library is the primary City library that serves the Project area. The library is located at 3900 South Western Avenue, approximately 3.5 miles southwest of the Project site. The library is a 14,500 square-foot facility that houses a collection of approximately 42,000 volumes with a full-time staff of approximately 15 persons.<sup>20</sup> According to the Department of City Planning's estimates, the library's service population was 79,747 persons in year 2010, and will reach 82,131 persons by year 2020. The LAPL has stated that the Exposition Park library adequately meets the current demand for library services.<sup>21</sup>

The Exposition Park Library is currently open five days per week and runs programs for children, teenagers, and adults. As with every LAPL branch, the library offers free access to computer workstations that provide access to the LAPL information network. These workstations also provide internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, a historic document and photograph collection, and specially designed websites for children, teenagers, and Spanish speakers. The library also provides free wireless internet access.

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<sup>18</sup> [https://en.wikipedia.org/wiki/Los\\_Angeles\\_Public\\_Library](https://en.wikipedia.org/wiki/Los_Angeles_Public_Library), accessed June 2013.

<sup>19</sup> *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure K-1, page 2.13-8, January 1995.*

<sup>20</sup> *Id.*

<sup>21</sup> *Written correspondence with Rona Berns, Library Facilities Division, Los Angeles Public Library, August 3, 2009 (refer to Appendix IV.J).*

Other libraries within a two-mile radius of the Project site include the Pico Union Branch Library, located at 1030 South Alvarado Street, approximately 0.9 mile north of the site, and the Central Library, located at 630 West 5<sup>th</sup> Street, approximately 1.9 miles northeast of the Project site.

### Branch Facilities Plan

LAPL policy is guided by the Branch Facilities Plan, which guides the construction, maintenance, and operation of public libraries and specifies standards in defining geographic service areas and facility size. The Branch Facilities Plan, adopted by the Board of Library Commissioners in August 1988 (revised February 2007), contains the required facilities expansion needs of the LAPL system. According to the Branch Facilities Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented below on Table IV.J-8.

**Table IV.J-8**  
**LAPL Branch Facilities Site Selection Criteria**

Population Served	Size of Facility	Property Required
Below 45,000 persons	12,500 sf	32,500 sf
Above 45,000 persons	14,500 sf	40,000 sf
Expansion or Special Situation <sup>a</sup>	Special Size	n/a
Regional Branch	Up to 20,000 sf	52,000 sf
<i>sf = square feet</i> <sup>a</sup> Due to available property size and configuration, architectural constraints or opportunities, or building code requirements, some facilities may differ from the recommended sizes. Source: LAPL, Summary of Branch Facilities Plan Revision, website: <a href="http://173.196.26.171/about/planning_overview.html">http://173.196.26.171/about/planning_overview.html</a> , accessed on June 2013.		

The Branch Facilities Plan sets standards for site selection for libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City in accordance with the standards in the Plan. The goals of the Branch Facilities Plan were implemented with money received by two bond issues: Phase I of the Branch Facilities Plan implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built. Currently, the Branch Facilities Plan is in a revision process in which the list of projects for LAPL through the year 2030 will be updated.

The standards set by the Branch Facilities Plan for site selection include the following:

- Branch building size standards: 14,500 square-foot facility for a service population of over 45,000 persons, 12,500 square feet for a service population of below 45,000 persons, special size for expansion or special situations, and up to 20,000 square feet for a regional branch library;
- Located in retail center;

- A one-story library building with security conscious design. Interior layouts designed to accommodate full access for the disabled, electronic technology, substantial shelving and seating capacities, and to include a community meeting room;
- Good visibility and street access;
- Easily accessible by car, by bus, and on foot;
- Taking into consideration the relative locations of all schools served by the branch; and
- Taking into consideration the relative locations of neighboring branch libraries.<sup>22</sup>

The Branch Facilities Plan also recommends that when a community reaches a population of 90,000 residents, an additional branch library should be considered for the area.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the project were to result in the following:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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 libraries.

#### *L.A. CEQA Thresholds Guide*

Based on the criteria established in the *L.A. CEQA Thresholds Guide*, the determination of significance for a project's impacts on library services shall be made on a case-by-case basis, considering the following factors:

1. The net population increase resulting from the proposed project;
2. 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

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<sup>22</sup> LAPL, the Plan, Criteria for New Libraries, available online:  
[http://173.196.26.171/about/planning\\_overview.html](http://173.196.26.171/about/planning_overview.html), accessed June 2013.

services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and

3. Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to LAPL).

### **Project Impacts**

As discussed in Section IV.A (Impacts Found to be Less Than Significant [Population & Housing]), the Project would introduce approximately 421 residents to the Project site. It should be noted that some or all of the 421 residents could already live in the Project area or City with an existing demand for library services that would not be increased with implementation of the Project. As discussed above, the Exposition Park Library's adequately meets the current demand for library services within the service boundary of the library. Also as discussed above, the Branch Facilities Plan recommends that when a community reaches a population of 90,000 persons, an additional branch library should be considered for the area. The current service population for the Exposition Park Library is 79,747 persons and is expected to reach 82,131 persons by the year 2020. The Project's addition of 421 residents (conservatively assuming that these are "new" residents to the area) would not cause the service population of the Exposition Park Library to reach or exceed 90,000 persons. Additionally, two other libraries (i.e., Pico Union Branch Library and the Central Library) are located within two miles of the Project site. For these reasons, the Project would not create a need for new or expanded library facilities. Therefore, Project impacts related to library services would be less than significant.

### **CUMULATIVE IMPACTS**

Similar to the proposed Project, although it is possible that some or all of the residents associated with the related projects could already live in the vicinity of the respective related projects or the City with an existing demand for library services and would not create an increased demand for such services with implementation of the related projects, for a conservative analysis, it is assumed that a net increase in the demand for library services would occur as a result of cumulative development in the Project area. In order to ensure that a project's contribution to a cumulative demand for library services would not be considerable, the LAPL recommends payment of a mitigation fee (refer to Mitigation Measure J-11). Through payment of this fee by the Project Applicant, cumulative impacts related to library services would be less than significant.

### **MITIGATION MEASURES**

To ensure that the Project's contribution to cumulative impacts related to library services would not be considerable, the following mitigation measure is required:

- J-11: The Project Applicant shall pay a mitigation fee of \$200 per capita based on the projected population generated as a result of the buildout of the proposed development. The funds will be used by LAPL for staff, books, computers, and other library materials.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### K. TRANSPORTATION/TRAFFIC

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#### INTRODUCTION

The information and analysis in this section is based primarily on the following reports, which are included in Appendix IV.K of this EIR:

- *Traffic Impact Study for the Oak Village Residences Project*, Linscott, Law & Greenspan, Engineers, July 14, 2009.
- *Oak Villages Residences Project – Supplemental Traffic Analysis*, Linscott, Law & Greenspan, August 2, 2012.

#### ENVIRONMENTAL SETTING

##### Study Area

In coordination with Los Angeles Department of Transportation (LADOT) staff, the eight study locations listed below were identified for analysis in the *Traffic Impact Study* prepared for the Project. These study locations provide local access to the Project area and define the extent of the boundaries for the study area, which is generally comprised of those locations that have the greatest potential to experience significant traffic impacts due to the Project.

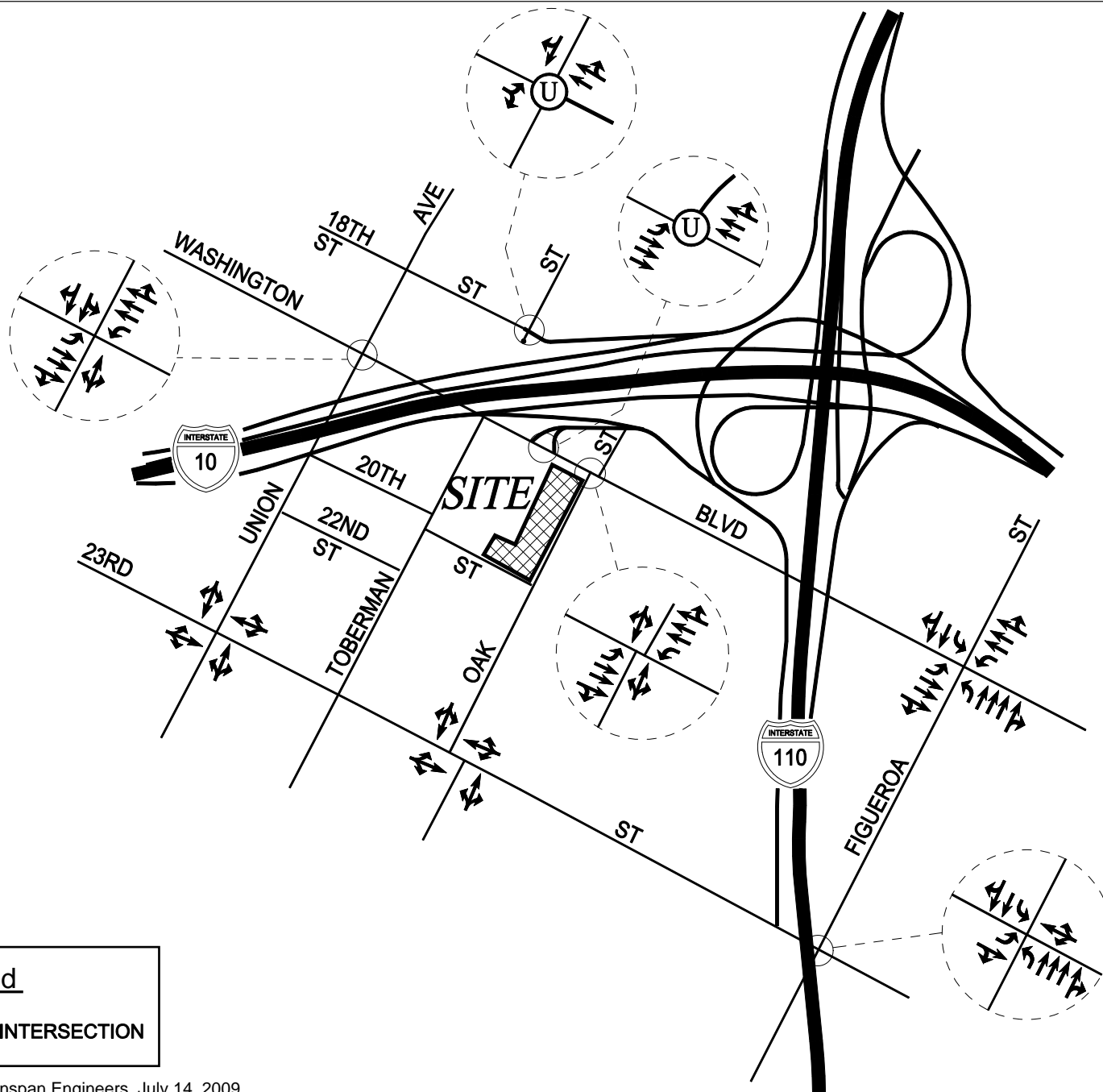
##### *Intersections*

1. Union Avenue/Washington Boulevard.
2. Union Avenue/23<sup>rd</sup> Street.
3. Toberman Street/18<sup>th</sup> Street-Interstate 110 (the “I-110”) Freeway Southbound (SB) Off-Ramp.
4. I-110 Freeway SB On-Ramp/Washington Boulevard.
5. Oak Street/Washington Boulevard.
6. Oak Street-Scarff Street/23<sup>rd</sup> Street
7. Figueroa Street/Washington Boulevard.
8. Figueroa Street/23<sup>rd</sup> Street.

Study intersection numbers 1, 2, 5, 6, 7, and 8 are presently controlled by traffic signals, while study intersection numbers 3 and 4 are currently stop sign controlled with the stop signs facing the minor street approaches. The existing lane configurations at the eight study intersections are shown on Figure IV.K-1.



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### Legend

Ⓢ UNSIGNALIZED INTERSECTION

Source: Linscott, Law & Greenspan Engineers, July 14, 2009.



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## Traffic Scenarios

### *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council*

Until recently, LADOT's traffic study methodology (which is the methodology used by most jurisdictions in southern California) required that a project's potential traffic impacts be measured against a future-without-project baseline condition, which generally corresponds to the build-out year for the proposed Project and is usually derived through an additive calculation of: 1) existing traffic volumes; 2) additional traffic due to ambient traffic (usually calculated based on an annual percentage growth of the existing traffic extending to the year of project build-out); and 3) the forecast traffic due to known related development projects in the area that could contribute future traffic to the analyzed study intersections.

In December 2010, the Sixth District Court of Appeals affirmed the Superior Court's decision in the case of *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (the "Sunnyvale case") to set aside approval of the proposed Mary Avenue Extension Project and certification of the Final EIR prepared for that project, because the Final EIR did not consider the project's traffic impacts against the existing environmental condition. Instead, the Final EIR considered the project's traffic impacts against a future 2020 "baseline" condition. The City of Sunnyvale City Council argued that the "use of 2020 conditions as a baseline offers the most accurate and informative portrayal of the environmental impacts of the [Mary Avenue Extension Project]." The Sunnyvale West Neighborhood Association responded that project impacts should be measured against the existing condition and not "a baseline as it might exist in 2020." Both the Superior Court and Court of Appeals agreed with the respondent.

As such, the following traffic scenarios were analyzed for the Project:

- **Existing Conditions (Year 2009)** – The analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions.
- **Existing-With-Project Conditions (Year 2015)** – This scenario projects the future traffic growth and intersection operating conditions that could be expected as a result of existing traffic conditions plus traffic generated by the Project in the vicinity of the Project site by the year 2015 (the Project's anticipated buildout year).
- **Future-Without-Project Conditions (Year 2015)** – This scenario projects the future traffic growth and intersection operating conditions that could be expected as a result of existing traffic conditions, regional growth, and related projects in the vicinity of the Project site by the year 2015.
- **Future-With-Project Conditions (Year 2015)** – This scenario projects the future traffic growth and intersection operating conditions that could be expected as a result of existing traffic

conditions, regional growth, related projects, and the Project in the vicinity of the Project site by the year 2015.

### Analysis Methodology

The study intersections were evaluated using the Critical Movement Analysis (CMA) methodology, which determines the intersection vehicle-to-capacity (V/C) ratio and corresponding level of service (LOS) for the turning movements and intersection characteristics at signalized intersections based on the definitions described on Table IV.K-1.

**Table IV.K-1**  
**LOS Definitions for Signalized Intersections (CMA Method)**

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may 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.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several 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.
<i>Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.</i>		

### Existing Street System

#### Roadway Classifications

The City uses the roadway categories recognized by regional, state, and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- Freeways are limited-access and high-speed travel ways included in the state and federal highway systems. Their purpose is to carry regional thru traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.
- Arterial roadways are major streets that primarily serve thru traffic and provide access to abutting properties as a secondary function. Arterials are divided into three categories: major highway-Class I, major highway-Class II, and secondary highway. Major highways generally provide four to eight lanes of travel and have access to intersecting freeways, primarily serving local and regional thru traffic. Secondary highways typically have four travel lanes as well as a parking lane that provides convenient access to adjacent land uses.
- Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two thru-travel lanes (i.e., one thru-travel lane in each direction) and may accommodate on-street parking. They may also provide access to abutting properties.
- Local roadways distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as a thru street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

### ***Freeways***

Regional vehicular access to the Project site is provided by the I-110 Freeway and Interstate 10 (the “I-10 Freeway”). Additional freeways providing indirect access to the Project area are Interstate 5 (the “I-5 Freeway”) and the U.S. 101 Freeway. Brief descriptions of the I-110 and I-10 Freeways are provided in the following paragraphs.

The *I-110 Freeway* is a major north-south oriented freeway connecting Pasadena to the north with the San Pedro area to the south. The I-110 Freeway generally contains four mainline freeway lanes and two elevated carpool/transitway lanes in each direction in the Project vicinity. The I-110 Freeway Transitway includes two high-occupancy vehicle (HOV) lanes in each direction from the south to its terminus at Adams Boulevard, just south of Downtown Los Angeles. In addition, a fully separated HOV interchange with Interstate 105 (the “Glenn Anderson Freeway”) accommodates additional HOV traffic to the I-110 Freeway Transitway from the communities along that freeway.

In the northbound direction on the I-110 Freeway, off-ramps are provided at Martin Luther King Jr. Boulevard, 39<sup>th</sup> Street (exit via the carpool/transitway lanes), 37<sup>th</sup> Street/Exposition Boulevard, and

Adams Boulevard. In the southbound direction on the I-110 Freeway, off-ramps are provided at Washington Boulevard, 23<sup>rd</sup> Street/Adams Boulevard, and Exposition Boulevard.

The *I-10 Freeway* is a major east-west oriented freeway connecting the City of Santa Monica to the west to the Inland Empire to the east. The I-10 Freeway generally contains four mainline freeway lanes in each direction along with auxiliary lanes in the Project vicinity. In the eastbound direction on the I-10 Freeway, off-ramps are provided at Vermont Avenue, Hoover Street, Grand Avenue, and Maple Street. In the westbound direction on the I-10 Freeway, off-ramps are provided at Los Angeles Street, Hoover Street/20<sup>th</sup> Street, and Vermont Avenue.

### ***Major and Secondary Roadways***

*Washington Boulevard* is an east-west oriented roadway that borders the Project site to the north. Washington Boulevard is designated as a major highway-Class II in the Transportation Element of the General Plan in the Project vicinity. Three through lanes are generally provided in both directions on Washington Boulevard in the Project vicinity. Separate exclusive left-turn lanes are provided on Washington Boulevard at major intersections. Parking is generally prohibited on both sides of Washington Boulevard within the study area. Washington Boulevard is posted for a 35 miles per hour speed limit in the Project vicinity.

*Figueroa Street* is a north-south oriented roadway that is located approximately five blocks east of the Project site. Figueroa Street is designated as a major highway-Class II in the Transportation Element of the General Plan in the Project vicinity. Three through travel lanes are generally provided in both directions on Figueroa Street in the Project vicinity. Separate exclusive left-turn lanes are provided on Figueroa Street at major intersections. One-hour parking between the hours of 9:00 AM and 4:00 PM is provided along Figueroa Street in the Project vicinity, with peak commuter period restrictions on a directional basis (i.e., No Stopping 7:00 AM to 9:00 AM in the northbound direction and No Stopping 4:00 PM to 7:00 PM in the southbound direction). Figueroa Street is posted for a 35 miles per hour speed limit in the Project vicinity.

*23<sup>rd</sup> Street* is an east-west oriented roadway that is located three blocks south of the Project site. The roadway is designated as a collector street in the Transportation Element of the General Plan in the Project vicinity. One through lane is provided in each direction on 23<sup>rd</sup> Street within the Project study area. Curbside parking is generally allowed along both sides of the roadway near the Project site. The posted speed limit on 23<sup>rd</sup> Street is 30 miles per hour in the Project vicinity.

*Oak Street* is a north-south oriented roadway that borders the Project site to the east. Oak Street is designated as a collector street in the Transportation Element of the General Plan in the Project vicinity. Oak Street is a discontinuous roadway that extends from the I-10 Freeway south to 23<sup>rd</sup> Street, and also for discontinuous segments north of the I-10 Freeway. One through travel lane is provided in both

directions on Oak Street in the Project vicinity. Oak Street is closed south of 20<sup>th</sup> Street from 9:00 AM to 2:00 PM for the adjacent Norwood Elementary School, and student drop-off for the school is limited to five minutes from 6:00 AM to 8:30 AM. Curbside parking is generally allowed along the west side of Oak Street near the Project site, and restricted along the east side of Oak Street near the Project site during school days. There is no posted speed limit on Oak Street near the Project site, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

*Union Avenue* is a north-south oriented roadway that is located two blocks west of the Project site. Union Avenue is designated as a local roadway in the Transportation Element of the General Plan in the Project vicinity. One through travel lane is provided in both directions on Union Avenue in the Project vicinity. Curbside parking is generally allowed along both sides of Union Avenue near the Project site. There is no posted speed limit on Union Avenue near the Project site, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

*Toberman Street* is a north-south oriented local roadway that is located one block west of the Project site. Toberman Street is designated as a local roadway in the Transportation Element of the General Plan in the Project vicinity. Toberman Street is a discontinuous roadway that terminates immediately south of the 18<sup>th</sup> Street/I-110 Freeway SB off-ramp intersection. The roadway is utilized as a storage area under the California Department of Transportation (Caltrans) I-10 Freeway right-of-way. One through travel lane is provided in each direction on Toberman Street in the Project vicinity. Curbside parking is generally allowed along both sides of Toberman Street near the Project site. There is no posted speed limit on Toberman Street near the Project site, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

*18<sup>th</sup> Street* is an east-west oriented roadway that is located north of the Project site. 18<sup>th</sup> Street extends diagonally (northwest to northeast) from the I-10 Freeway. 18<sup>th</sup> Street is designated as a local roadway in the Transportation Element of the General Plan in the Project site vicinity. One through travel lane is provided in each direction on 18<sup>th</sup> Street within the Project study area. Curbside parking is generally allowed along both sides of 18<sup>th</sup> Street near the Project site. There is no posted speed limit on 18<sup>th</sup> Street near the Project site, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

## **Existing Traffic Conditions**

### ***Study Intersections***

Manual traffic counts of vehicular turning movements were conducted at each of the eight study intersections during the weekday morning and afternoon peak commuter periods to determine the existing



peak-hour traffic volumes<sup>1</sup>. The manual traffic counts at the study intersections were conducted from 7:00 AM to 10:00 AM to determine the weekday morning peak hour and from 3:00 PM to 6:00 PM to determine the weekday afternoon peak hour. Traffic volumes at the study intersections show the typical peak periods between 7:00 AM to 10:00 AM generally associated with the morning commuter hours, and 3:00 PM to 6:00 PM generally associated with the afternoon commuter hours.

The morning and afternoon peak-period manual counts of vehicle movements at the eight study intersections are summarized on Table IV.K-2. The existing traffic volumes at the study intersections during the morning and afternoon peak hours are shown on Figures IV.K-2 and IV.K-3, respectively. Summary data worksheets of the manual traffic counts at the study intersections are contained in Appendix IV.K. The existing morning and afternoon peak-hour intersection conditions are shown on Table IV.K-3. All of the study intersections currently operate at acceptable levels of service (LOS A through C) for urban conditions.

### **Public Transit Service**

Local public transit service in the vicinity of the Project is currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, and the Metro Blue Line rail system, which is also operated by Metro. A summary of the existing transit routes, including the route, destinations, and the peak-hour headways is presented on Table IV.K-4. The existing public transit routes in the Project site vicinity are illustrated on Figure IV.K-4.

### ***Metro Bus Transit Services***

Metro provides bus transit service along major roadways within the traffic analysis study area: Adams Boulevard, Venice Boulevard, Washington Boulevard, Hoover Street, Union Avenue, Figueroa Street and Flower Street, as well as the I-110 Freeway Transitway. Metro operates approximately 17 local and limited local Metro bus transit routes in the immediate vicinity of the Project site. Most of the Metro local bus transit routes provide headways of two to 12 buses per hour during the weekday afternoon peak hour. As previously noted, bus transit service is provided along the I-110 Freeway Transitway which includes two HOV lanes in each direction from the south to its terminus at Adams Boulevard, just south of Downtown Los Angeles.

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<sup>1</sup> Note that morning and afternoon peak-hour counts conducted at the adjacent Oak Street/23<sup>rd</sup> Street and Scarff Street/23<sup>rd</sup> Street locations were combined in order to analyze as one study intersection (i.e., No.6, Oak Street-Scarff Street/23<sup>rd</sup> Street) as requested by LADOT. A summary of the combined traffic volumes is noted on the count data worksheets contained in Appendix IV.J.

**Table IV.K-2  
Existing Traffic Volumes\***

No.	Intersection	Date	Direction	AM Peak Hour		PM Peak Hour	
				Began	Volume	Began	Volume
1.	Union Avenue/Washington Boulevard	5/06/08	NB SB EB WB	7:30	485 646 1,115 872	5:00	351 637 1,068 1,228
2.	Union Avenue/23 <sup>rd</sup> Street	5/06/08	NB SB EB WB	7:15	506 232 188 328	5:00	362 382 203 388
3.	Toberman Street/18 <sup>th</sup> Street – I-110 Freeway SB Off-Ramp	5/06/08	NB SB EB WB	7:15	2 18 26 204	3:00	1 18 24 92
4.	I-110 Freeway SB On-Ramp/ Washington Boulevard	5/06/08	NB SB EB WB	7:30	0 0 1,405 905	5:00	0 0 1,273 1,293
5.	Oak Street/Washington Boulevard	5/06/08	NB SB EB WB	7:15	152 10 1,143 900	5:00	79 22 1,002 1,274
6.	Oak Street-Scarff Street/23 <sup>rd</sup> Street	5/06/08	NB SB EB WB	7:15	65 64 460 388	5:00	40 51 402 410
7.	Figueroa Street/Washington Boulevard	5/06/08	NB SB EB WB	7:30	2,618 385 961 995	4:45	2,137 762 1,006 1,251
8.	Figueroa Street/23 <sup>rd</sup> Street	5/06/08	NB SB EB WB	7:30	2,489 331 418 216	5:00	2,041 785 320 374

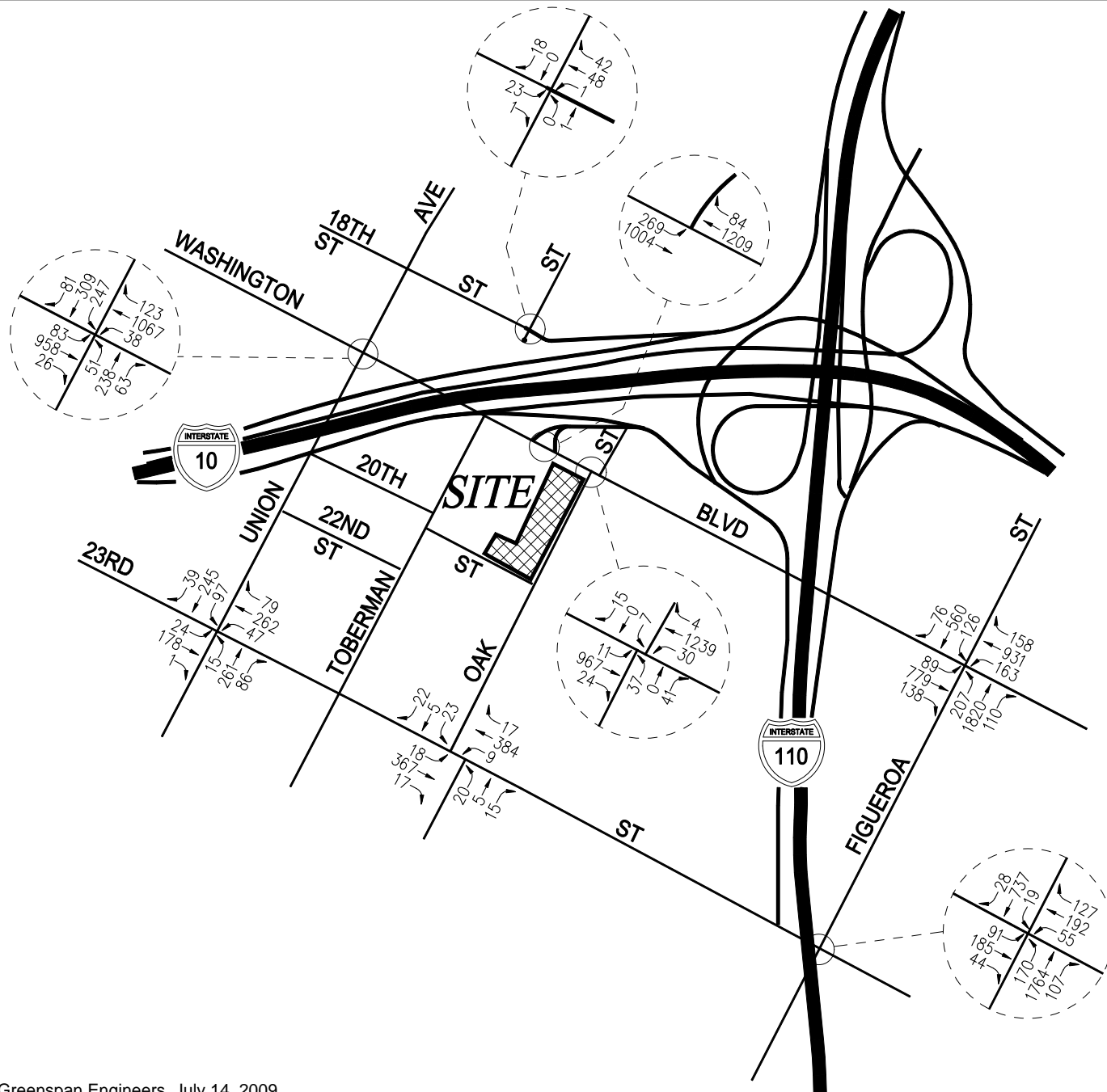
\* - Counts conducted by City Traffic Counters. Note: Year 2008 manual traffic counts were adjusted by a 1.0 percent ambient growth factor to reflect Year 2009 existing conditions. It is important to note that the adjusted year 2009 traffic volumes used for the baseline conditions analysis are conservative since, based on a review of historical trends, system-wide traffic volumes in years 2009, 2010, and 2011 have actually decreased year to year due to the severe economic recession.

Source: Linscott, Law & Greenspan, Engineers, July 2009.

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Source: Linscott, Law & Greenspan Engineers, July 14, 2009.



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**Table IV.K-3  
Existing LOS**

No.	Intersection	AM Peak Hour		PM Peak Hour	
		CMA	LOS	CMA	LOS
1.	Union Avenue/Washington Boulevard	0.689	B	0.649	B
2.	Union Avenue/23 <sup>rd</sup> Street	0.529	A	0.510	A
3.	Toberman Street/18 <sup>th</sup> Street – I-110 Freeway SB Off-Ramp	0.119	A	0.072	A
4.	I-110 Freeway SB On-Ramp/ Washington Boulevard	0.472	A	0.583	A
5.	Oak Street/Washington Boulevard	0.314	A	0.271	A
6.	Oak Street-Scarff Street/23 <sup>rd</sup> Street	0.282	A	0.257	A
7.	Figueroa Street/Washington Boulevard	0.717	C	0.713	C
8.	Figueroa Street/23 <sup>rd</sup> Street	0.540	A	0.608	B
<i>Source: Linscott, Law &amp; Greenspan, Engineers, July 2009.</i>					

### ***LADOT Bus Transit Services***

LADOT provides bus transit service within the study area with its Commuter Express and DASH shuttle bus service. Commuter Express service is provided along Figueroa Street and Flower Street in the Project study area. DASH service is provided between the Financial District and Exposition Park/University of Southern California (USC) and between Pueblo Del Rio and Exposition Park/USC along Exposition Boulevard, Flower Street, Jefferson Boulevard, and Vermont Avenue in the Project study area.

### ***Metro Blue Line***

Metro operates the Metro Blue Line light-rail service, which runs between Downtown Los Angeles and Downtown Long Beach. Service is provided seven days per week, with headways of 10 to 12 trains per hour. At the Washington Boulevard station, located just west of Grand Avenue, train service runs from about 4:00 PM to 1:00 AM on both weekdays and weekends. Metro generally operates two-car trains, with each car having a capacity of 76 seats and 54 standees.



**Table IV.K-4  
Existing Transit Routes<sup>1</sup>**

Route	Destinations	Roadway Near Site	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro Route 30	Los Angeles, Downtown Los Angeles, Boyle Heights, East Los Angeles, Monterey Park	Pico Boulevard, Broadway	NB SB	4 4	4 4
Metro Route 31	Los Angeles, Downtown Los Angeles, Boyle Heights, East Los Angeles, Monterey Park	Pico Boulevard, Broadway	NB SB	5 4	4 4
Metro Route 33	Santa Monica, Venice, Culver City, Downtown Los Angeles	Venice Boulevard, Main Street	EB WB	6 9	8 6
Metro Route 35	Culver City, Los Angeles, Downtown Los Angeles	Washington Boulevard, Broadway	EB WB	5 5	4 4
Metro Route 37	Culver City, West Adams, North University Park, Downtown Los Angeles	Adams Boulevard, Grand Avenue	EB WB	11 12	10 11
Metro Route 81	South Los Angeles, Exposition Park, Downtown Los Angeles, Cypress Park, Highland Park, Eagle Rock	Figueroa Street	NB SB	7 6	4 8
Metro Route 333	Santa Monica, Venice, Culver City, Downtown Los Angeles	Venice Boulevard	EB WB	6 10	8 6
Metro Route 335	Culver City, Los Angeles, Downtown Los Angeles	Washington Boulevard, Broadway	EB WB	5 6	5 5
Metro Route 381	South Los Angeles, Exposition Park, Downtown Los Angeles, Cypress Park, Highland Park, Eagle Rock	Figueroa Street	NB SB	3 3	4 4
Metro Route 442	Hawthorne, Inglewood, Los Angeles, Downtown Los Angeles	Figueroa Street	NB SB	2 0	0 2
Metro Route 444	Rancho Palos Verdes, Torrance, Los Angeles, Downtown Los Angeles	Figueroa Street, Adams Boulevard	NB SB	2 3	4 2
Metro Route 445	San Pedro, Los Angeles, Downtown Los Angeles	Figueroa Street, Adams Boulevard	NB SB	2 2	2 2
Metro Route 446	San Pedro, Wilmington, Carson, Los Angeles, Downtown Los Angeles	Figueroa Street, Adams Boulevard	NB SB	1 1	2 2
Metro Route 447	San Pedro, Wilmington, Carson, Los Angeles, Downtown Los Angeles	Figueroa Street, Adams Boulevard	NB SB	2 2	1 2
Metro Route 450X	South Bay, Los Angeles, Downtown Los Angeles	Figueroa Street, Adams Boulevard, Flower Street	NB SB	4 4	3 4
Metro Route 603	Los Angeles, Pico-Union, Westlake, Los Angeles, Glendale	Hoover Street, 23 <sup>rd</sup> Street, Grand Avenue	NB SB	6 6	6 6
Metro Route 730	Los Angeles, Downtown Los Angeles	Pico Boulevard, Broadway	EB WB	6 6	6 6
LADOT Commuter	Redondo Beach, Hermosa Beach, Manhattan Beach, El Segundo,	Figueroa Street, Flower Street	NB SB	4 0	0 4

**Table IV.K-4  
Existing Transit Routes<sup>1</sup>**

Route	Destinations	Roadway Near Site	No. of Buses/Trains During Peak Hour		
Express 438	Downtown Los Angeles				
LADOT Commuter Express 448	Rancho Palos Verdes, Lomita, Harbor City, Wilmington, USC, Downtown Los Angeles	Figueroa Street, Flower Street	NB SB	2 0	0 3
LADOT Dash F	Downtown Los Angeles (Financial District, Exposition Park, USC)	Figueroa Street, Flower Street	NB SB	6 6	6 6
LADOT Dash Pico-Union/Echo Park	Echo Park, Pico-Union, Downtown Los Angeles	Washington Boulevard, Union Avenue	NB SB	5 5	6 6
Metro Blue Line	Long Beach Transit Center to Downtown Los Angeles (Carson, Rancho Dominguez, Compton, Lynnwood, Vernon)	Flower Street, Grand Avenue	NB SB	12 11	11 11
<sup>1</sup> Sources: Los Angeles County Metropolitan Transportation Authority (Metro), and City of Los Angeles Department of Transportation websites.					
Source: Linscott, Law & Greenspan, Engineers, July 14, 2009.					

### ***Metro Exposition Transit Corridor Project<sup>2</sup>***

The Metro Exposition Transit Corridor project is the latest extension of the 73-station Metro Rail System and the first to connect Downtown Los Angeles with the Westside and Culver City. Phase 1 project is an 8.6-mile-long rail line that runs along the Metro-owned Exposition Boulevard right-of-way from the existing Metro Rail station at 7<sup>th</sup> Street/Metro Center in Downtown Los Angeles to the Venice Boulevard/Robertson Boulevard intersection in Culver City. The Phase 1 Expo Line provides 12 stations, including two existing stations (7<sup>th</sup> Street/Metro Center and Pico Boulevard) shared with the existing Metro Blue Line. The following 10 new stations are provided along the Phase I Expo Line:

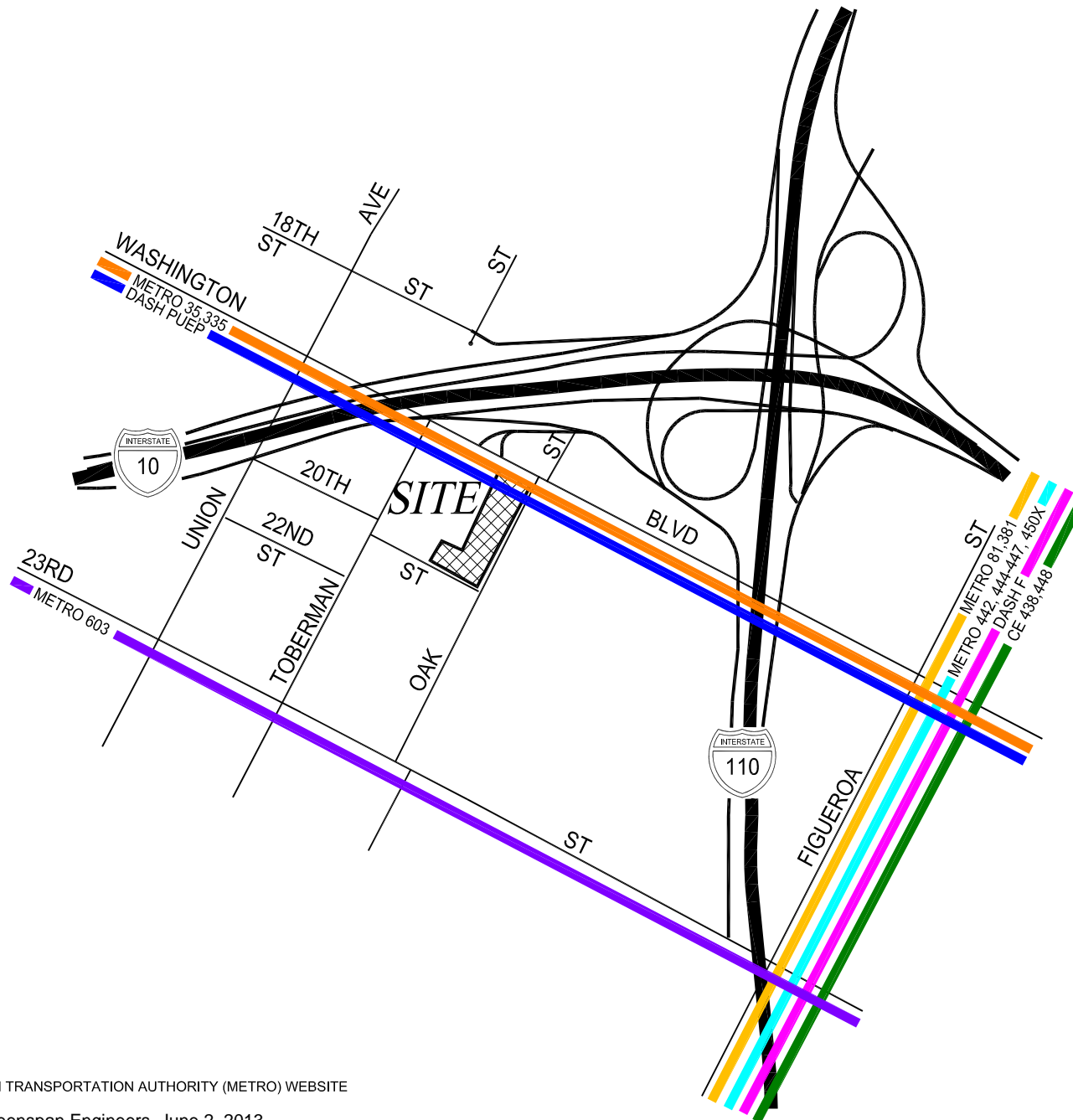
- 23<sup>rd</sup> Street
- Jefferson Boulevard/USC
- USC/Exposition Park
- Exposition Boulevard/Vermont Avenue

<sup>2</sup> Source: [http://www.metro.net/projects\\_studies/exposition/images/expo\\_factsheet.pdf](http://www.metro.net/projects_studies/exposition/images/expo_factsheet.pdf)

- Exposition Boulevard/Western Avenue
- Exposition Boulevard /Crenshaw Boulevard
- Farmdale Avenue
- Exposition Boulevard/La Brea Avenue
- La Cienega Boulevard/ Jefferson Boulevard
- Culver City

Service on the Phase I Expo Line began in April 2012. The 6.6-mile-long Phase II Expo Line project is planned to extend westward from the Culver City Station to the City of Santa Monica and run along the old Pacific Electric Exposition right-of-way to 4<sup>th</sup> Street and Colorado Avenue. Service for Phase II is expected to begin in year 2015 and will provide the following seven new stations:

- National Boulevard/Palms Boulevard
- Exposition Boulevard/Sepulveda Boulevard
- Olympic Boulevard/26<sup>th</sup> Street
- Colorado Avenue/4<sup>th</sup> Street
- Exposition Boulevard/Westwood Boulevard
- Exposition Boulevard/Bundy Avenue
- Colorado Avenue/17<sup>th</sup> Street



MAP SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY (METRO) WEBSITE

Source: Linscott, Law & Greenspan Engineers, June 2, 2013.



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## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant transportation/traffic impact if the project would result in the following:

- 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;
- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- e) Result in inadequate emergency access; or
- f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

#### *L.A. CEQA Thresholds Guide*

The *L.A. CEQA Thresholds Guide* requires the transportation analysis to address the following areas of study: (1) intersection capacity; (2) street segment capacity; (3) freeway capacity; (4) neighborhood intrusion impacts; (5) project access; (6) transit system capacity; (7) parking; and (8) in-street construction impacts.

### *Intersection Capacity*

A project would normally have a significant impact on intersection capacity if project traffic causes an increase in the V/C ratio on the intersection operating conditions after the addition of project traffic of one of the following shown in Table IV.K-5:

**Table IV.K-5**  
**LADOT Significance Threshold**

<b>Intersection Conditions with Project Traffic</b>		<b>Project-related Increase in V/C Ratio</b>
<b>LOS</b>	<b>V/C</b>	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01
<i>Source: LADOT.</i>		

### *Street Segment Capacity*

Analysis of street segment capacity is typically prepared for programmatic-level projects, such as a General Plan or Community Plan. Thus, evaluation of street segments would not provide any additional insight into the traffic impacts of the Project beyond those impacts identified as part of the intersection capacity and neighborhood intrusion analysis, and therefore, such analysis is not required for this EIR.

### *Los Angeles County Congestion Management Program*

The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours.

The following CMP intersection monitoring locations are in the project vicinity:

- Alvarado Boulevard/Wilshire Boulevard

The Project would not add more than 50 trips to any CMP monitoring intersection. Therefore, because the Project would not add 50 or more trips during the morning or afternoon peak hours at CMP

monitoring intersections, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

The following CMP freeway monitoring locations in the Project vicinity have been identified:

- I-10 Freeway at Budlong Avenue
- I-110 Freeway at Slauson Avenue

The CMP TIA guidelines require that freeway monitoring locations must be examined if the Project will add 150 or more trips (in either direction) during either the morning and afternoon weekday peak periods. The Project would not add 150 or more trips (in either direction), during either the morning and afternoon weekday peak hours to the CMP freeway monitoring location, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required, and a less than significant impact would result.

#### *Neighborhood Intrusion Impacts*

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 > 120 trips if final ADT < 1,000

ADT increase > 12 percent if final ADT > 1,000 and < 2,000

ADT increase > 10 percent if final ADT > 2,000 and < 3,000

ADT increase > 8 percent if final ADT > 3,000

Where “final ADT” is defined as total projected future daily volume including project, ambient, and related project growth.

#### *Project Access*

##### Access

Based on the Screening Criteria, an analysis of impacts related to Project Access is required for projects that would generate 500 or more daily trips or 43 or more peak-hour trips. A project would normally



have a significant access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the morning or afternoon peak hour, under Future-with-Project conditions.

#### Bicycle, Pedestrian, and Vehicular Safety

The determination of potential impacts related to Bicycle, Pedestrian, and Vehicular Safety shall be determined 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; and
- 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.

#### *Transit System Capacity*

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 a project and available transit capacity.

#### *Parking*

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.

#### *In-Street Construction Impacts*

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 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 any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- The availability of alternative vehicular or pedestrian access within ¼ 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;
- The existence of other bus stops or routes with similar routes/destinations within a ¼ 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 on that/those day(s).

#### Temporary Loss of On-Street Parking

- The current utilization of on-street parking;
- The availability of alternative parking locations or public transit options (e.g., bus, train) within ¼ mile of the project site; and
- The length of time that existing parking spaces would be unavailable.

Bicycle, Pedestrian, and Vehicular Safety

- 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; and
- 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.

***Discussion of Significance Thresholds***

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in any impacts related to issues “c,” “d,” “e,” and “g” listed under the *CEQA Guidelines*. Thus, no further analysis of these issues is required.

Regarding issue “a” listed under the *CEQA Guidelines*, this threshold along with factor 1 listed under the *L.A. CEQA Thresholds Guide* both considered in assessing Project impacts related to Intersection LOS under Project Impacts, below.

Regarding issue “b” listed under the *CEQA Guidelines*, this threshold is similar to factor 3 listed under the *L.A. CEQA Thresholds Guide*. As discussed above, no impacts related to this factor would occur. Thus, no further analysis related to issue “b” and factor 3 is required.

Regarding issue “f” listed under the *CEQA Guidelines*, this threshold along with factor 1 listed under the *L.A. CEQA Thresholds Guide* both considered in assessing Project impacts related to Parking under Project Impacts, below.

As discussed previously, the Project would not result in any impacts related to factor 2 listed under the *L.A. CEQA Thresholds Guide*, and no further analysis related to factor 2 is required.

## **Project Impacts**

### ***Intersection Capacity***

#### ***Trip Generation***

Traffic volumes associated with the existing commercial catering business use on-site were also forecast for the weekday morning and afternoon peak hours, and over a 24-hour period. Similar to the Project, the trip generation rates outlined in ITE *Trip Generation* manual were reviewed to forecast traffic volumes generated by the existing commercial catering business use on-site. The trip generation rates listed in the ITE *Trip Generation* manual do not specifically address the current operational characteristics of the existing site commercial catering business. As such, it was determined that it would be appropriate to determine the vehicle trips generated by the existing site commercial catering business based on observed trip generation patterns at the site. Manual driveway traffic counts were conducted at the existing site from 6:00 AM to 10:00 AM and from 2:00 PM to 6:00 PM to obtain the weekday morning and afternoon peak trip generation. The existing site weekday morning and afternoon peak-hour traffic count data were used as the basis for the trip generation determination.

Based on traffic counts conducted at the existing site, the following trip generation characteristics were determined during the survey day:

- Morning peak hour: 35 trips (9 inbound trips, 26 outbound trips)
- Afternoon peak hour: 23 trips (15 inbound trips, 8 outbound trips)

For purposes of this analysis, it has been assumed that the afternoon peak-hour traffic volumes represent ten percent of the daily trips. Thus, the daily traffic volumes are estimated to be 350 daily trips.

As presented on Table IV.K-6, the existing site commercial catering business currently generates 35 vehicle trips (9 inbound trips and 26 outbound trips) during the morning peak hour and 23 vehicle trips (9 inbound trips and 26 outbound trips) during the afternoon peak hour. Over a 24-hour period, the existing commercial catering business currently generates 350 daily trip ends during a typical weekday (175 inbound trips and 175 outbound trips).

**Table IV.K-6  
Project Trip Generation**

Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Use								
Condominiums	142 du	832	11	51	62	50	24	74
Less Existing Uses (to be removed)*								
Commercial Catering Business	12,335 gsf	(350)	(9)	(26)	(35)	(15)	(8)	(23)
Net Project Traffic		482	2	25	27	35	16	51
du = dwelling unit                      gsf = gross square feet								
* Note: Peak-hour trip generation based on empirical count, daily trips estimated. Refer to Appendix B of the Traffic Study in Appendix IV.K of the Draft EIR.								
Source: Linscott, Law & Greenspan, Engineers, July 2009.								

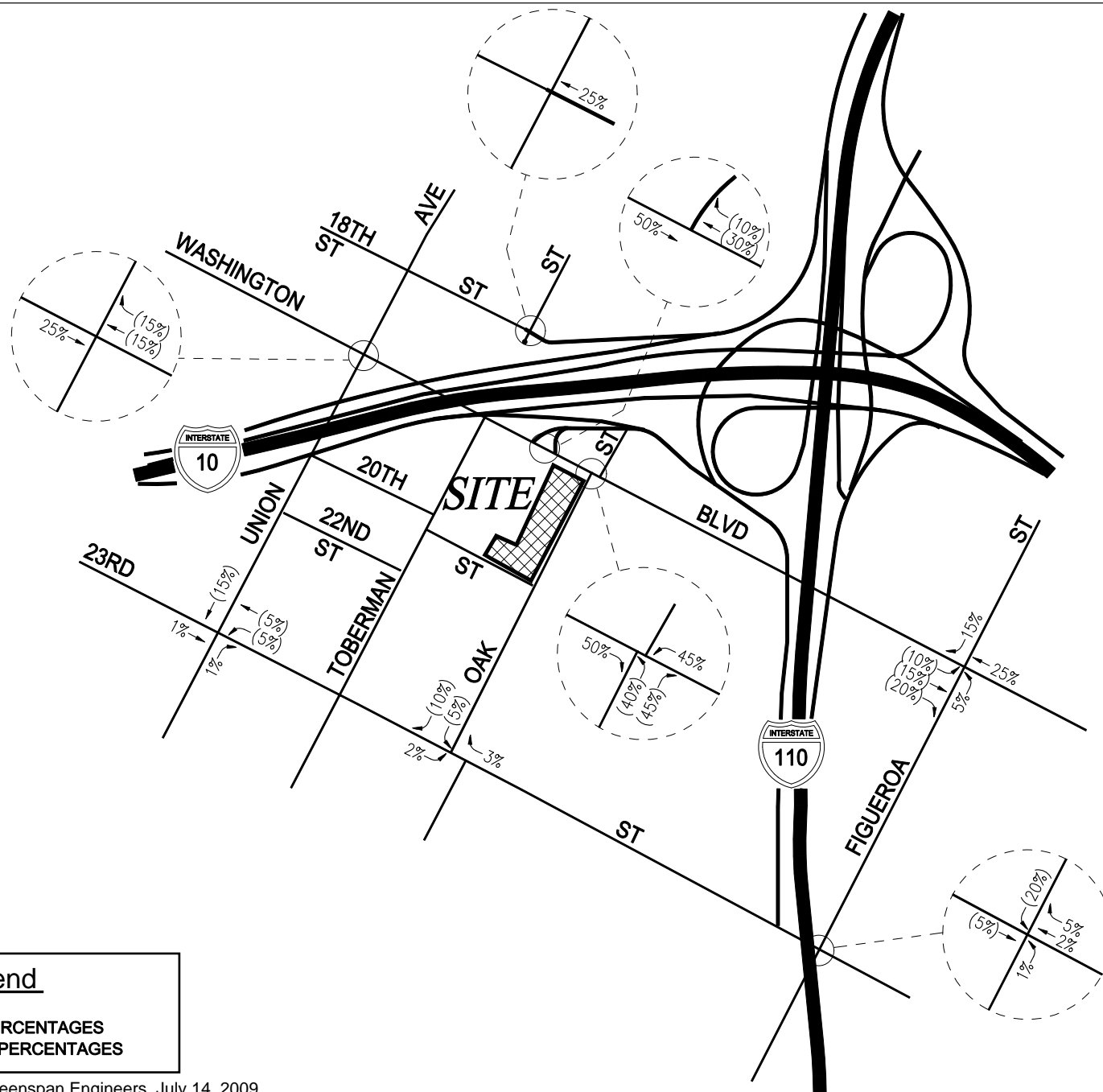
A comparison of the Project and existing site development trip generation is also summarized on Table IV.K-6. As indicated on Table IV.K-6, the Project is expected to generate a net increase of 27 vehicle trips (2 inbound trips and 25 outbound trips) during the morning peak hour when compared with the existing site development trip generation. During the afternoon peak hour, the Project is expected to generate a net increase of 51 vehicle trips (35 inbound trips and 16 outbound trips when compared with the existing site development trip generation. Over a 24-hour period the Project is forecast to generate a net increase of 482 daily trip ends (241 inbound trips and 241 outbound trips) during a typical weekday when compared with the existing site development trip generation based on existing driveway volumes.

#### *Trip Distribution and Assignment*

The existing site traffic was assigned to the local roadway system based on a traffic distribution pattern developed from the manual driveway traffic count data obtained at the existing site. The traffic distribution pattern reflects the existing land use, the existing site access scheme, existing traffic movements, characteristics of the surrounding roadway system, proximity to Downtown Los Angeles, and nearby employment and residential areas as applicable to the existing site commercial catering business. The traffic distribution percentages forecast for the existing site for the eight study intersections for morning and afternoon peak hours are provided on Figures IV.K-5 and IV.K-6, respectively.



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Project traffic was assigned to the local roadway system based on a traffic distribution pattern developed in consultation with LADOT staff. The traffic distribution pattern reflects the Project land use, the proposed Project site access scheme, existing traffic movements, characteristics of the surrounding roadway system, proximity to Downtown Los Angeles, and nearby employment and residential areas. The Project traffic distribution percentages forecast for the eight study intersections are provided on Figure IV.K-7. The Project trip distribution pattern was submitted for review and approval by LADOT staff before finalization.

As previously discussed, on-site parking spaces for the Project would be provided within the two subterranean parking levels. Primary vehicular access to and from the Project site is provided via the following roadways:

- Washington Boulevard
- Oak Street
- Figueroa Street

The principal ingress routes for the Oak Village Residences site were determined based on the accessibility via the nearby freeway ramp system and appropriate arterial routes. Principal freeway routes in the vicinity of the Project site include the I-110 Freeway and the I-10 Freeway. The Oak Village Residences site is also situated within an area that provides desirable access via arterial streets surrounding the site. Key arterials providing access to the Project study area include: Hoover Street, Union Avenue, Oak Street, Figueroa Street, Venice Boulevard, Washington Boulevard, 23<sup>rd</sup> Street and Adams Boulevard.

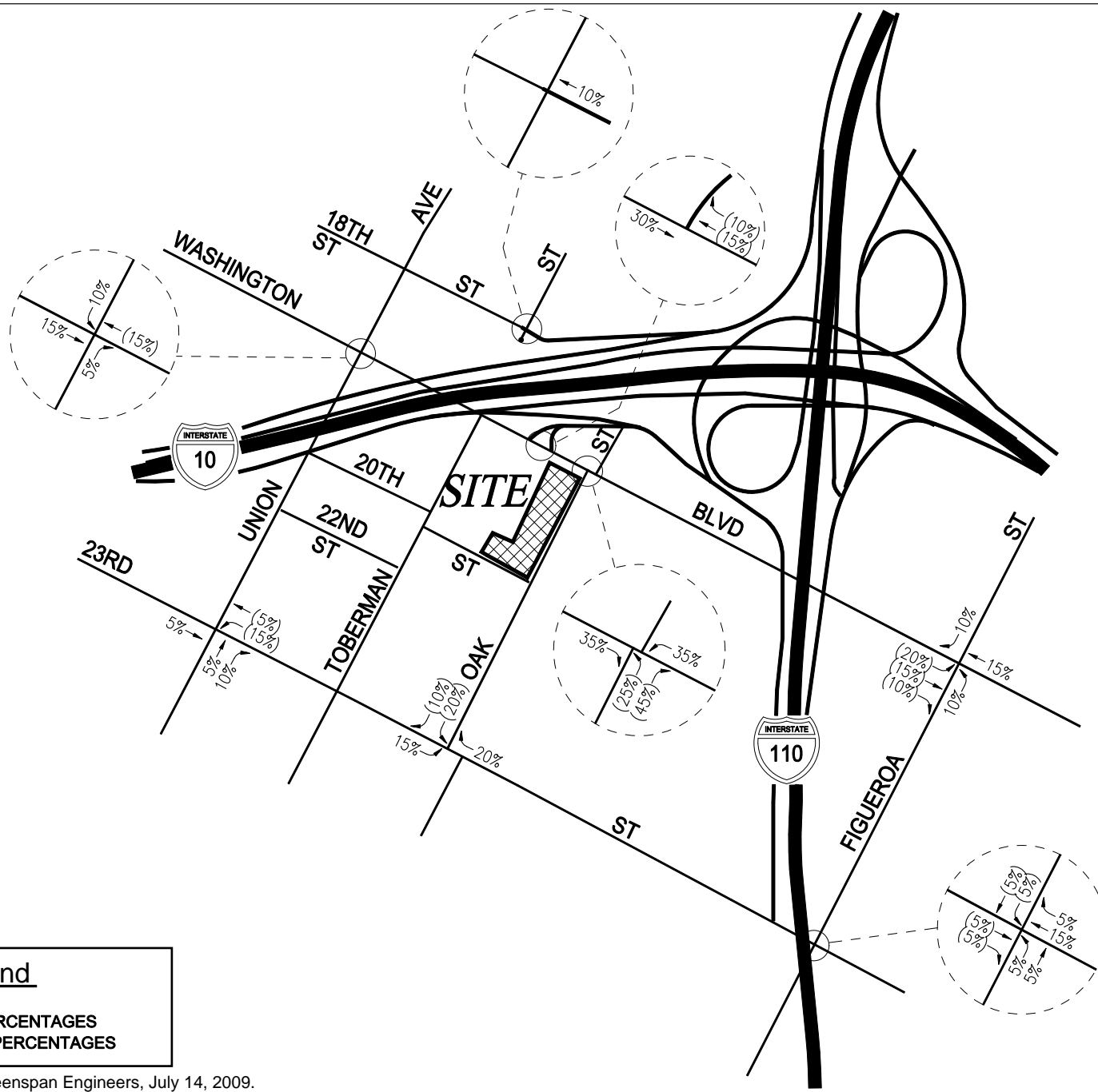
The trip generation forecasts for the Project were assigned to the surrounding freeway and arterial systems based on the previously described distribution pattern.

The forecast net Project traffic volumes for study intersections during the weekday morning and afternoon peak hours are displayed on Figures IV.K-8 and IV.K-9, respectively.

The traffic volume assignments presented on Figures IV.K-8 and IV.K-9 reflect the traffic distribution characteristics shown on Figure IV.K-7.

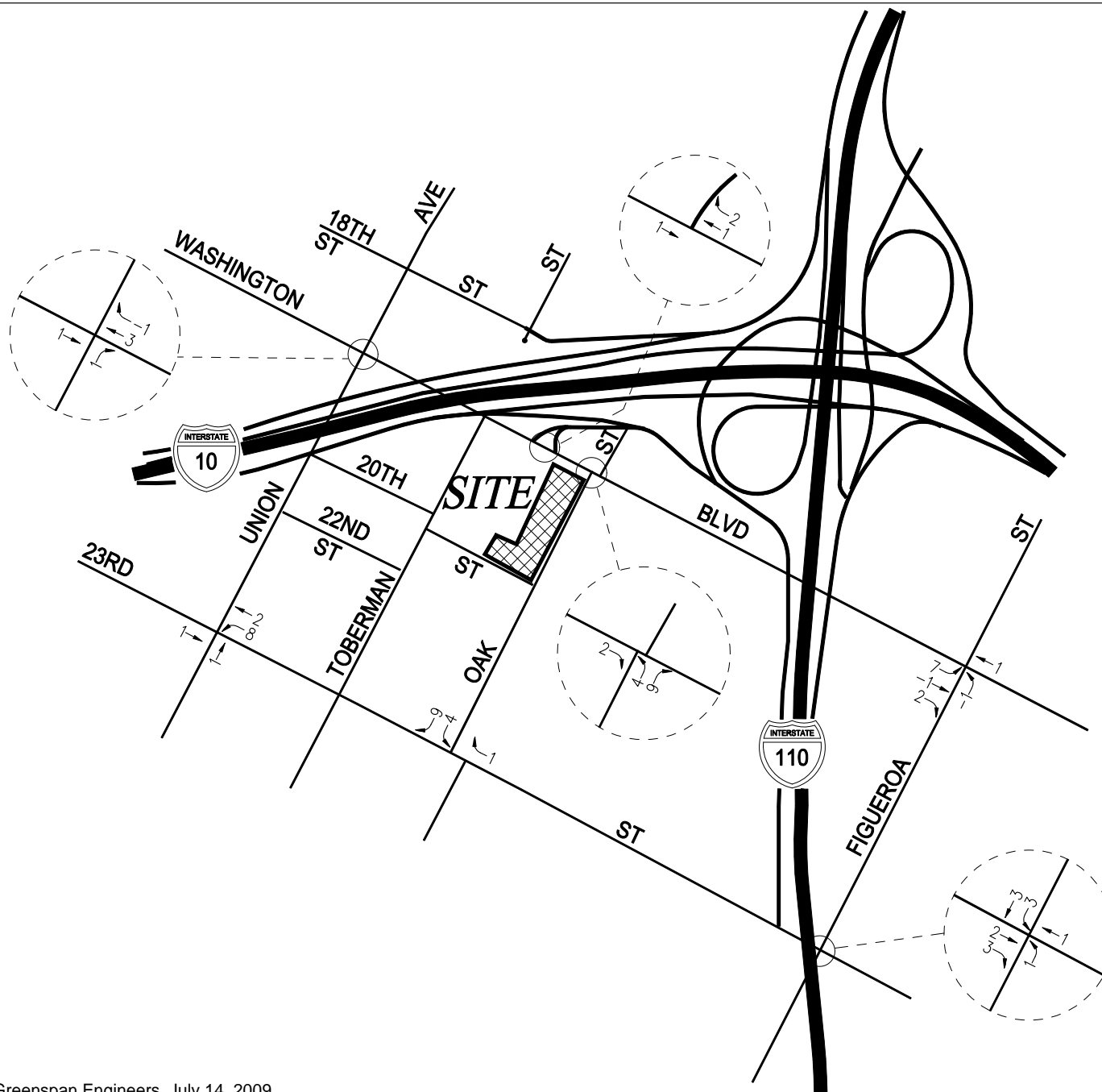
The Project traffic generation forecast and the existing site trip generation shown on Table IV.K-6 as well as the corresponding existing site trip distribution patterns displayed on Figures IV.K-5 and IV.K-6.

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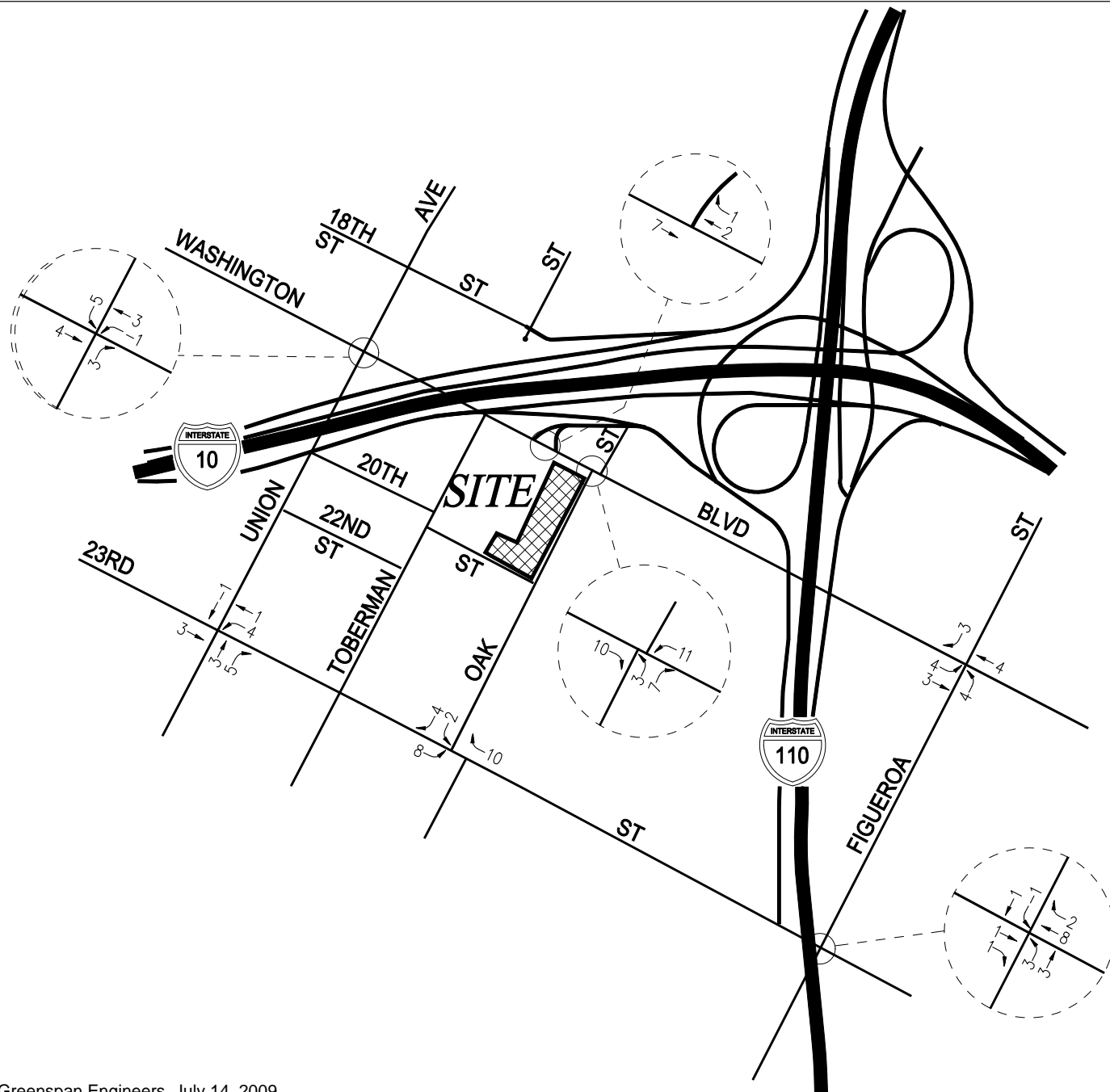


Source: Linscott, Law & Greenspan Engineers, July 14, 2009.



Figure IV.K-8  
Project Traffic Volumes  
AM Peak Hour

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Source: Linscott, Law & Greenspan Engineers, July 14, 2009.





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### ***Year Existing-With-Project Traffic Conditions***

The LOS at the study intersections that would occur under the Existing-With-Project traffic condition is shown on Table IV.K-7. Traffic volumes under the Existing-With-Project traffic condition for the morning and afternoon peak hours are shown on Figures IV.K-10 and IV.K-11, respectively. Based on the City's threshold of significance, the Project would not result in any significant impacts at any of the study intersections.

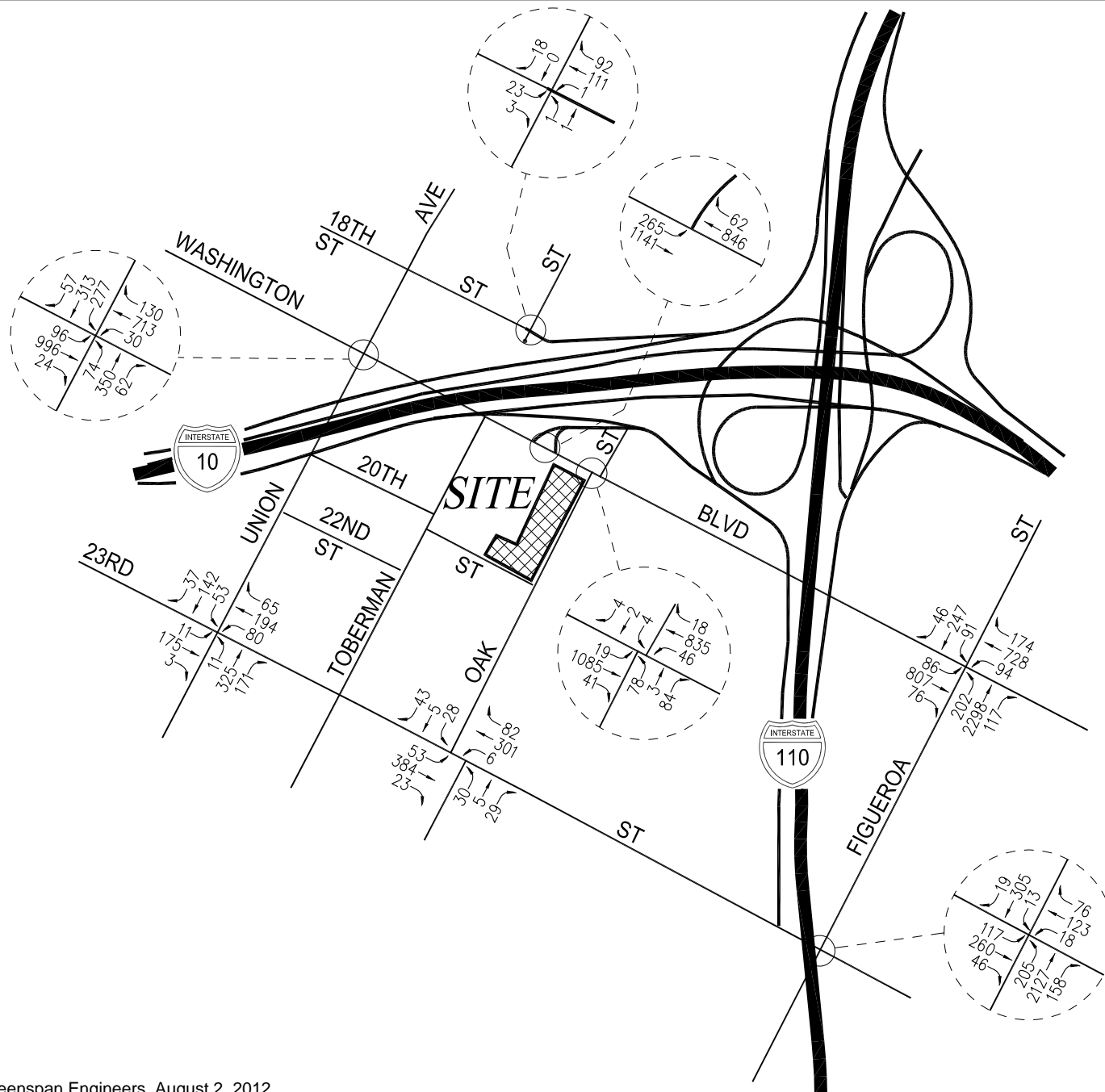
**Table IV.K-7**  
**Existing-With-Project LOS**

No.	Intersection	Peak Hour	Without Project		With Project		Change	Significant Impact?
			v/c	LOS	v/c	LOS		
1.	Union Avenue/ Washington Boulevard	AM	0.689	B	0.690	B	0.001	No
		PM	0.649	B	0.655	B	0.006	No
2.	Union Avenue/23 <sup>rd</sup> Street	AM	0.529	A	0.536	A	0.007	No
		PM	0.510	A	0.519	A	0.009	No
3.	Toberman Street/18 <sup>th</sup> Street – I-110 Freeway SB Off-Ramp	AM	0.119	A	0.119	A	0.000	No
		PM	0.072	A	0.073	A	0.001	No
4.	I-110 Freeway SB On-Ramp/ Washington Boulevard	AM	0.472	A	0.473	A	0.001	No
		PM	0.583	A	0.584	A	0.001	No
5.	Oak Street/Washington Boulevard	AM	0.314	A	0.324	A	0.010	No
		PM	0.271	A	0.278	A	0.007	No
6.	Oak Street-Scarff Street/23 <sup>rd</sup> Street	AM	0.282	A	0.291	A	0.009	No
		PM	0.257	A	0.273	A	0.016	No
7.	Figueroa Street/ Washington Boulevard	AM	0.717	C	0.717	C	0.000	No
		PM	0.713	C	0.714	C	0.001	No
8.	Figueroa Street/23 <sup>rd</sup> Street	AM	0.540	A	0.542	A	0.002	No
		PM	0.608	B	0.617	B	0.009	No
Source: Linscott, Law & Greenspan, Engineers, July 14, 2009 and August 2, 2012.								

### ***Neighborhood Intrusion***

As shown on Figure IV.K-7, 45 percent of the Project's traffic (217 daily trips) would distribute eastbound on Washington Boulevard to Figueroa Street; 25 percent of the Project's traffic (120 daily trips) would distribute westbound on Washington Boulevard, with 10 percent (12 daily trips) distributing northbound to the I-10 Freeway and 15 percent (108 trips) distributing westbound on Washington Boulevard; and 30 percent of the Project's traffic (145 daily trips) would distribute southbound on Oak Street to 23<sup>rd</sup> Street, with 10 percent distributing westbound to Union Avenue and 20

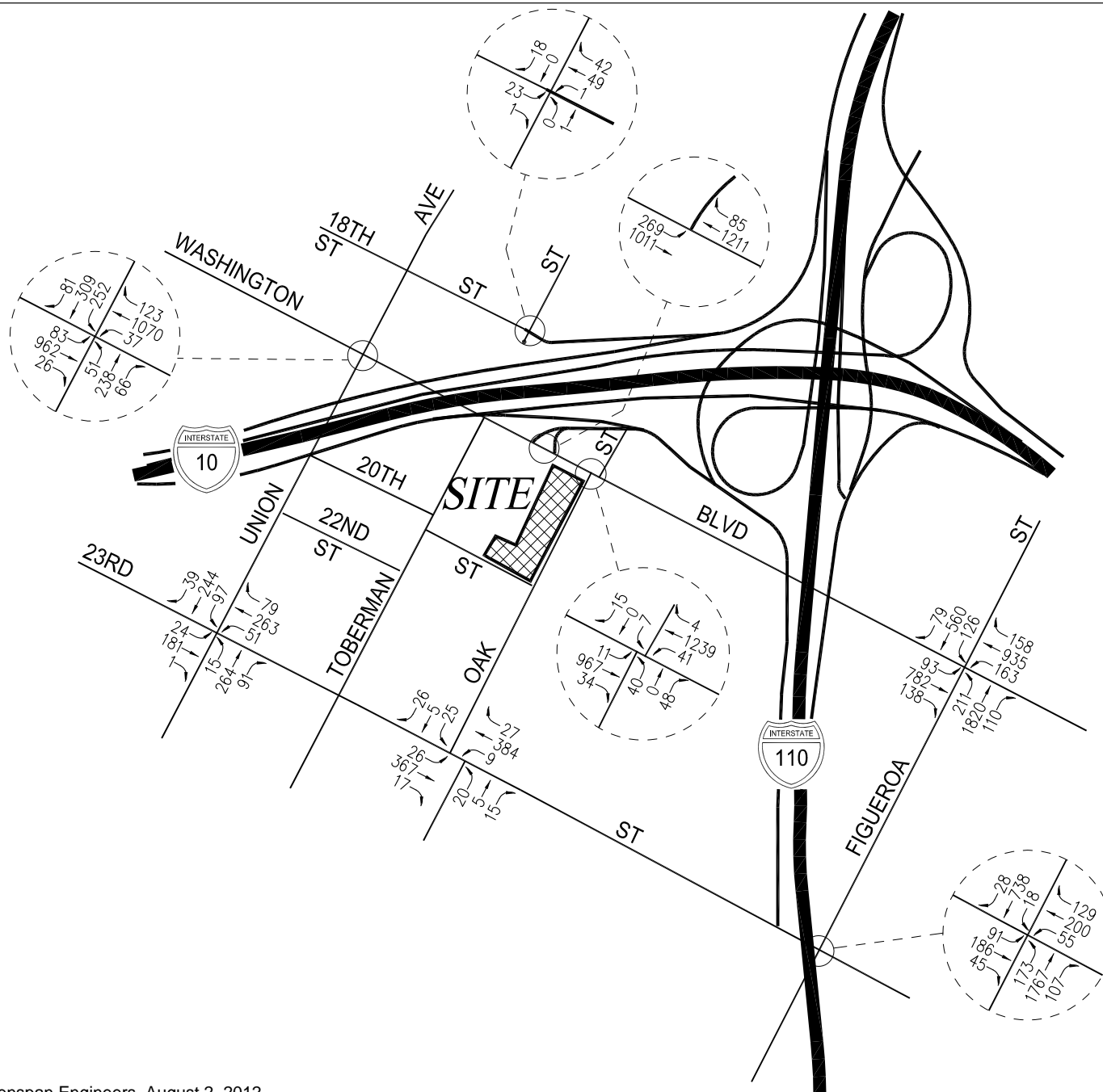
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Source: Linscott, Law & Greenspan Engineers, August 2, 2012.



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Source: Linscott, Law & Greenspan Engineers, August 2, 2012.



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percent distributing eastbound to Figueroa Street. None of the Project's traffic would distribute to neighborhood streets. Therefore, Project impacts related to neighborhood intrusion would be less than significant.

### ***Project Access***

As stated previously, a project would normally have a significant access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the morning or afternoon peak hour, under Future-with-Project conditions. The study intersections closest to the Project site are Oak Street and Washington Boulevard (#5) and Oak Street-Scarff Street and 23<sup>rd</sup> Street (#6). As shown on Table IV.K-7, under the Future-With-Project traffic condition, both of these intersections would operate at LOS A. Therefore, Project impacts related to project access would be less than significant.

### ***Bicycle, Pedestrian, and Vehicular Safety***

The Project site is located in an area with a relatively high level of pedestrian activity. To reduce potential conflicts associated with bicyclists, pedestrians, and vehicle drivers near the site, the Project includes reconstruction of some sidewalk areas adjacent to the Project site to allow for easier pedestrian flow and installation of caution signage for bicyclists, pedestrians, and drivers at the Project driveway. Additionally, there are no bicycle lanes on the roadways adjacent to the Project site. Further, to ensure that the Project would not cause safety conflicts associated with the Norwood Elementary School and Downtown Value School located in the vicinity of the Project site, the Project Applicant would comply with Mitigation Measures K-1 through K-11, which were provided by the LAUSD, and Mitigation Measure K-12. With implementation of the safety measures listed above and Mitigation Measures K-1 and K-12, potential bicycle, pedestrian, and vehicular conflicts would be minimized, and impacts would be less than significant.

### ***Transit***

Pursuant to the CMP requirements, the estimated number of transit trips that would be generated by the Project was calculated using values set forth in the CMP (i.e., person trips equal 1.4 times the vehicle trips, and transit trips equal 3.5 percent of the total person trips). The calculations are as follows:

- AM Peak Hour =  $27 \times 1.4 \times 0.035 = 2$  Transit Trips
- PM Peak Hour =  $51 \times 1.4 \times 0.035 = 3$  Transit Trips
- Daily Trips =  $482 \times 1.4 \times 0.035 = 24$  Transit Trips

As shown on Table IV.K-4, 21 bus transit lines and routes are provided adjacent to or in close proximity to the Project site, with three of these transit lines and routes directly serving the site along one of the



Project frontages (i.e., along Washington Boulevard). As outlined on Table IV.K-4, under the "No. of Buses/Trains During Peak Hour" column, these three transit lines provide service for an average of (i.e., average of the directional number of buses during the peak hours) 31 buses during the morning peak hour and 30 buses during the afternoon peak hour. Therefore, based on the above calculated morning and afternoon peak-hour transit trips, this would correspond to less than one additional transit rider per bus or train during the morning and afternoon peak hour. It is anticipated that the existing transit service in the Project area would adequately accommodate the Project-generated transit trips. Thus, given the low number of Project-generated transit trips per bus, based on the calculated number of generated transit trips, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the Project.

### ***In-Street Construction***

During the Project's construction phase, temporary lane and sidewalk closures could occur along Washington Boulevard and temporary closures of the on-street parking and sidewalks could occur along 20<sup>th</sup> Street and Oak Street adjacent to the Project site to allow for movement of construction equipment on and off the site and to allow for installation of utilities. However, the Project Applicant would be required to install signage in appropriate locations to notify travelers of the temporary closures and could possibly be required to provide signage for detour around the closures (if necessary). The degree to which signage, detour, or a traffic management plan would be required of the Project Applicant to minimize temporary traffic impacts during the construction phase would be determined by LADOT at the time the Applicant applied for permit that is required for the temporary closures. Additionally, pedestrian access would not be substantially affected by closure of the sidewalks along the Project site's boundary, considering that the lengths of sidewalks are relatively short and that controlled pedestrian crossings are available at the intersection of Washington Boulevard and Oak Street and a stop sign and pedestrian crossing is available at the intersection of Oak Street and 20<sup>th</sup> Street. Also, until the proposed subterranean parking garage is available for use, all construction workers would be required to park at a parking lot or garage in the Project area and would not be allowed to use on-street parking in the vicinity. If adequate off-street parking is not available within walking distance of the Project site, a shuttle shall be provided to transport construction workers to and from the Project site from a parking facility. Further, the Project's construction would not block access to any of the adjacent properties. For these reasons, Project impacts related to in-street construction would be less than significant.

### ***Parking***

#### ***Neighborhood Parking Intrusion Surveys***

Comments were received during the public scoping and Notice of Preparation processes for the Project's environmental impact report on the issue of neighborhood parking intrusion within the neighborhood of the Project site. Several specific comments were raised by local residents (i.e., residents who live south

of Washington Boulevard near the Project site) regarding parking intrusion within their neighborhood. In order to fully address these comments and this issue as part of the environmental review process, detailed parking observation surveys were conducted to determine if employees of the existing catering business, other area business, and nearby schools are parking in the neighborhood.

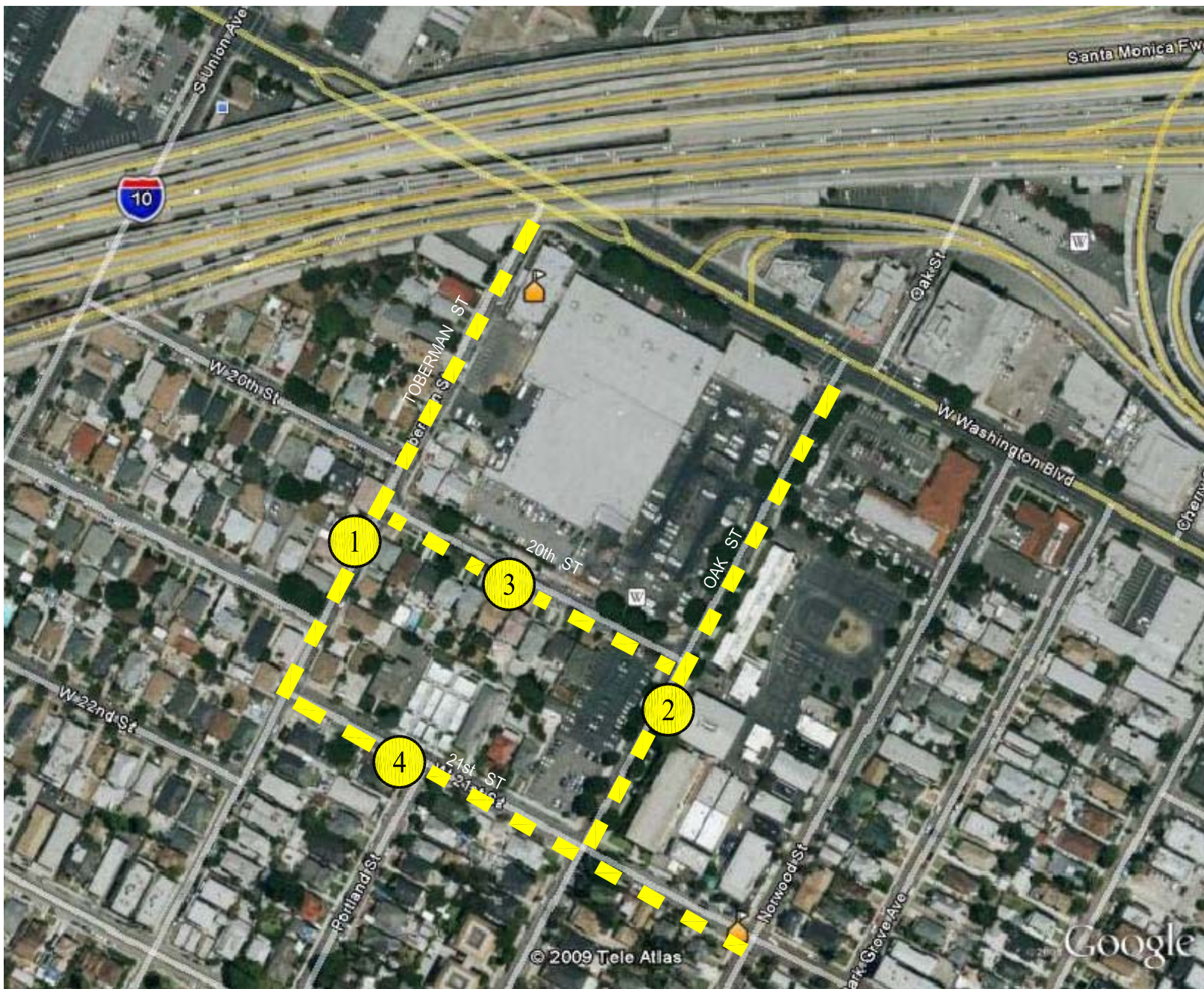
Based on comments received by the public, visual observations of parking intrusion were conducted by survey personnel at selected locations along roadways in the immediate vicinity of the Project site. A total of four survey stations were selected for analysis based on a determination of those areas most likely to be impacted by parking intrusion. The following four survey stations are shown on Figure IV.K-12 and include the following street segments:

- Station No. 1: Toberman Street between Washington Boulevard and 21st Street
- Station No. 2: Oak Street between Washington Boulevard and 21st Street
- Station No. 3: 20th Street between Toberman Street and Oak Street
- Station No. 4: 21st Street between Toberman Street and Norwood Street

Survey personnel were directed to observe all vehicles that entered and physically parked along their respective street segments, note the time that the vehicle parked, and observe the travel pattern of the parking patron. Survey personnel were provided with walkie-talkies so that they were able to communicate with one another in order to track a pedestrian as they departed one survey station and entered another survey station. Each motorist parking was observed in order to determine their destination. The vehicles observed to park on-street during the survey periods were then classified into one of four categories: motorists destined to the existing Project site (employee or patron), motorists destined to a neighborhood residential use, motorists destined to nearby schools, and motorists destined to other locations (e.g., parking within survey location and walking out of area, etc.).

In conducting the surveys in the above fashion, a final determination could be made as to whether or not the motorist parking in the survey areas were related to other non-residential land uses and thus, intruding into the neighborhood. It is important to note that the survey areas (i.e., the four stations) were not determined to be all inclusive, rather, it was determined that these stations would have the greatest likelihood of intrusion so that a determination could be made as to whether parking intrusion was occurring in locations in closest proximity to the Project site.

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Source: Linscott, Law & Greenspan Engineers, July 14, 2009.



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Based on the typical operations of the existing catering business on the Project site as well as nearby schools and businesses, the parking intrusion surveys were conducted during two weekday mornings between the hours of 5:00 AM and 8:00 AM. This time period was determined to generally coincide with the arrival and departure times of employees and the associated food trucks associated with the catering business, as well as the arrival times of staff from nearby schools. The parking intrusion surveys were conducted on Thursday, May 28, 2009 and Friday, May 29, 2009. The results are shown on Table IV.K-8. Detailed summaries of the parking observations are provided in Appendix IV.K.

**Table IV.K-8  
Neighborhood Parking Intrusion Observations**

No.	Location	May 28, 2009	May 29, 2009
		No. of Parking Intrusions	No. of Parking Intrusions
1.	Toberman Street between Washington Boulevard and 21 <sup>st</sup> Street	7	6
2.	Oak Street between Washington Boulevard and 21 <sup>st</sup> Street	10	16
3.	20 <sup>th</sup> Street between Toberman Street and Oak Street	18	8
4.	20 <sup>th</sup> Street between Toberman Street and Oak Street	7	10
<b>Total Observed Neighborhood Parking Intrusions</b>		<b>42</b>	<b>40</b>
<i>Source: Linscott, Law &amp; Greenspan, Engineers, July 2009.</i>			

It can be concluded from these observations that parking intrusion has been found to occur in the adjoining neighborhood. During the survey periods, vehicles were documented to park on the surveyed streets and based on visual observations were attributable to the existing catering business, nearby schools, and other businesses. Out of these vehicles, a total of 19 and 20 vehicles were associated with the existing catering business on the Project site during the Thursday and Friday parking observations, respectively. Therefore, it also can be concluded that neighborhood parking intrusion by motorists associated with the existing Project site catering business would discontinue should the Project be built and occupied, and additional on-street parking should be available for local residents.

Additionally, the Project would meet LAMC parking requirements by providing a total of 320 parking spaces within two subterranean parking levels. This on-site parking supply includes 284 resident parking spaces (two per unit) and 36 guest parking spaces. Nearby access to public transit facilities and opportunities are also anticipated to reduce both resident and guest parking demands at the Project site.

As described above, the Project would provide parking that meets the applicable parking requirements, and is conveniently located along a major transit corridor. As such, no significant off-site parking impacts or Project-related “overflow” parking into adjoining residential neighborhoods are anticipated.



Therefore, implementation of the Project would not result in inadequate parking capacity, and parking impacts would be less than significant.

## **CUMULATIVE IMPACTS**

### **Intersection Capacity**

#### ***Automated Traffic Surveillance and Control/Adaptive Traffic Control System***

According to LADOT, funding has been secured for the upgrade of all City traffic signals to the combined Automated Traffic Surveillance and Control (ATSAC)/Adaptive Traffic Control System (ATCS). ATSAC provides computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short-term traffic timing changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. ATCS provides real time control of traffic signals and includes additional loop detectors, closed-circuit television, an upgrade in the communications links, and a new generation of traffic control software. LADOT estimates that the ATSAC system reduces critical V/C ratios by seven percent. The ATCS upgrade further reduces the critical V/C ratios by three percent. Therefore, a reduction of ten percent (0.10) was assumed in the calculation of the V/C ratios for the signalized study intersections in the future baseline analysis conditions.

#### ***Related Projects***

A forecast of traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. The related projects research was based on information on file with LADOT, as well as recently approved traffic impact analysis reports prepared for other potential developments in the vicinity of the Project site. The list of these related projects is presented on Table A in the Supplemental Traffic Analysis included in Appendix IV.K to the Draft EIR. The location of the related projects is shown on Figure A in the Supplemental Traffic Analysis.

Traffic volumes generated by the related projects were calculated using rates provided in the Institute of Transportation Engineers (ITE) Trip Generation manual. The related projects respective traffic generation for the morning and afternoon peak hours, as well as on a daily basis for a typical weekday is summarized on Table B in the Supplemental Traffic Analysis included in Appendix IV.K to the Draft EIR.

### ***Ambient Traffic Growth***

In order to account for unknown related projects, the existing traffic volumes were increased at an annual rate of 1.0 percent per year to the year 2015 (i.e., the anticipated year of Project build-out). The ambient growth factor was based on general traffic growth factors provided in the most recent CMP and determined in consultation with LADOT staff. Thus, application of the 1.0 percent annual growth factor allows for a conservative forecast of future traffic volumes in the area. Further, it is noted that the CMP traffic growth rate is intended to anticipate future traffic generated by development projects in the Project vicinity. Thus, the inclusion of both a forecast of traffic generated by known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data results in a conservative estimate of

### ***Future-Without-Project Traffic Conditions***

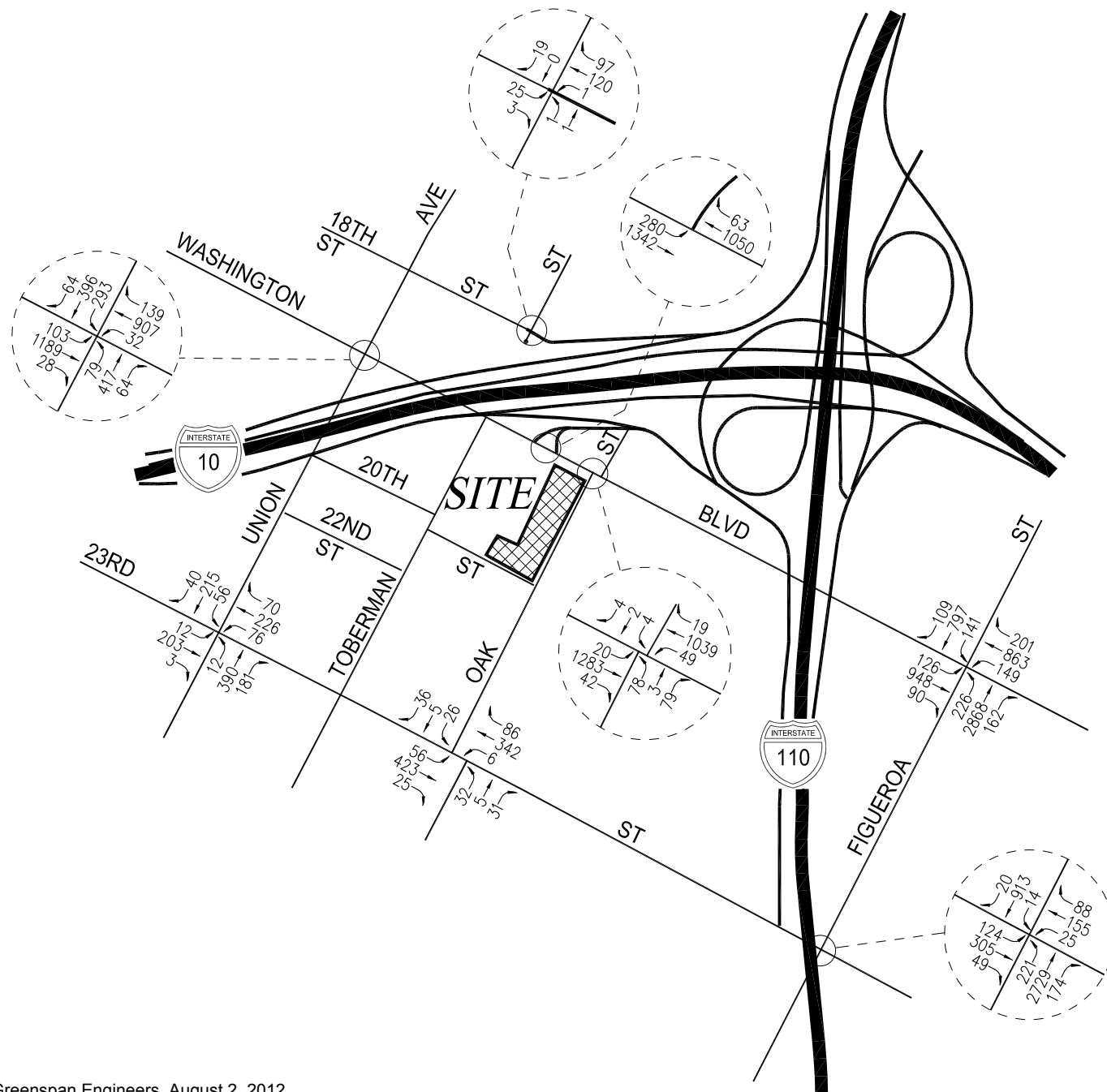
The LOS at the study intersections that would occur under the Future-Without-Project traffic condition is shown on Table IV.K-9. Traffic volumes under the Future-Without-Project traffic condition morning and afternoon peak volumes are shown on Figures IV.K-13 and IV.K-14, respectively.

**Table IV.K-9  
Future-Without-Project LOS**

No.	Intersection	Peak Hour	Without Project	
			CMA	LOS
1.	Union Avenue/ Washington Boulevard	AM	0.770	C
		PM	0.759	C
2.	Union Avenue/23 <sup>rd</sup> Street	AM	0.581	A
		PM	0.591	A
3.	Toberman Street/18 <sup>th</sup> Street – I-110 Freeway SB Off-Ramp	AM	0.127	A
		PM	0.079	A
4.	I-110 Freeway SB On-Ramp/ Washington Boulevard	AM	0.543	A
		PM	0.668	B
5.	Oak Street/Washington Boulevard	AM	0.337	A
		PM	0.300	A
6.	Oak Street-Scarff Street/23 <sup>rd</sup> Street	AM	0.289	A
		PM	0.261	A
7.	Figueroa Street/ Washington Boulevard	AM	0.914	E
		PM	0.990	E
8.	Figueroa Street/23 <sup>rd</sup> Street	AM	0.654	B
		PM	0.869	D
Source: Linscott, Law & Greenspan, Engineers, Supplemental Traffic Analysis, August 2, 2012.				



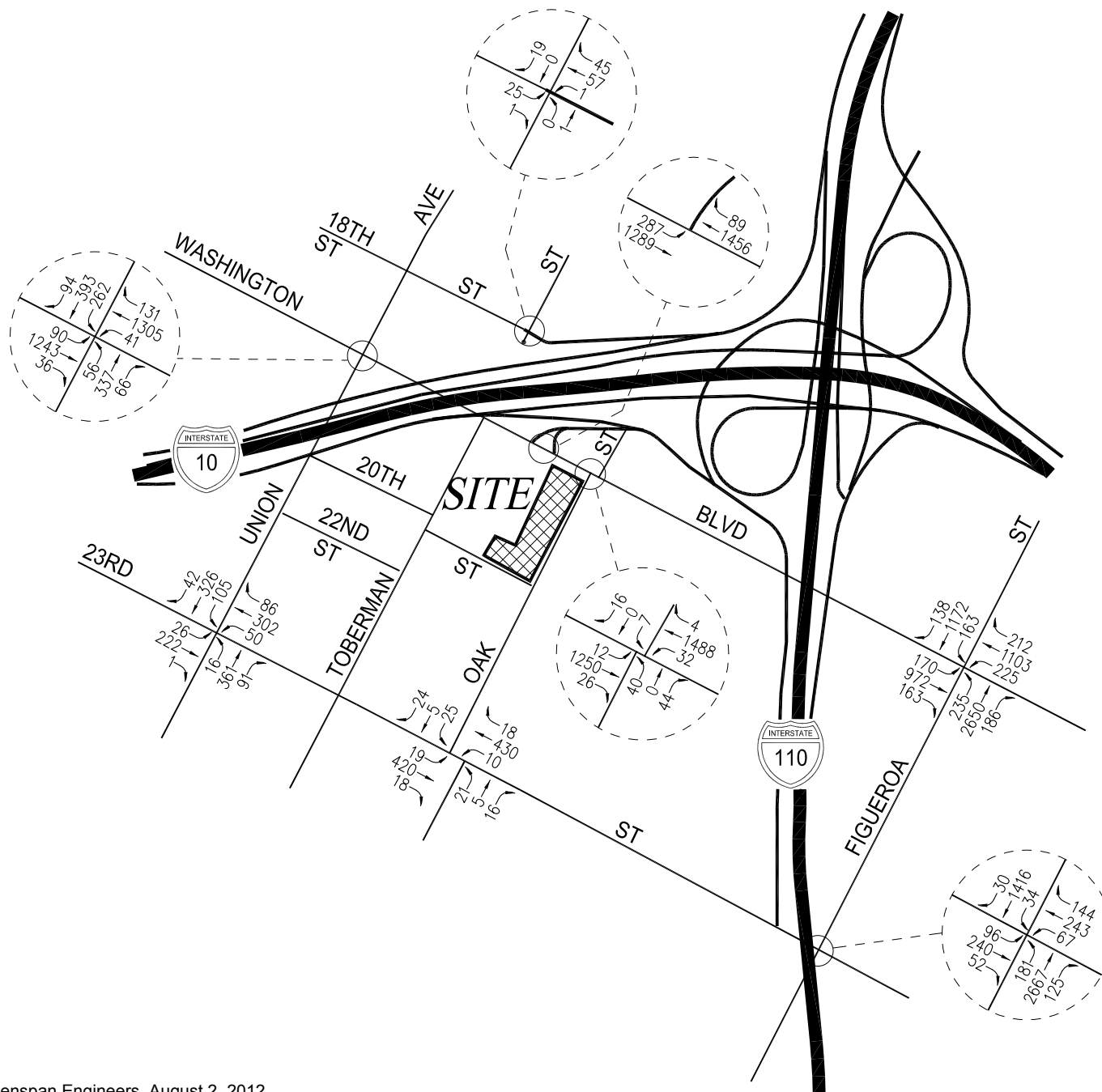
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***Future-With-Project Traffic Conditions***

The LOS at the study intersections that would occur under the Future-With-Project traffic condition is shown on Table IV.K-10. Traffic volumes under the Future-With-Project traffic condition morning and afternoon peak volumes are shown on Figures IV.K-15 and IV.K-16, respectively. Based on the City's threshold of significance, the Project would not result in any significant impacts at any of the study intersections.

**Table IV.K-10  
Future-With-Project LOS**

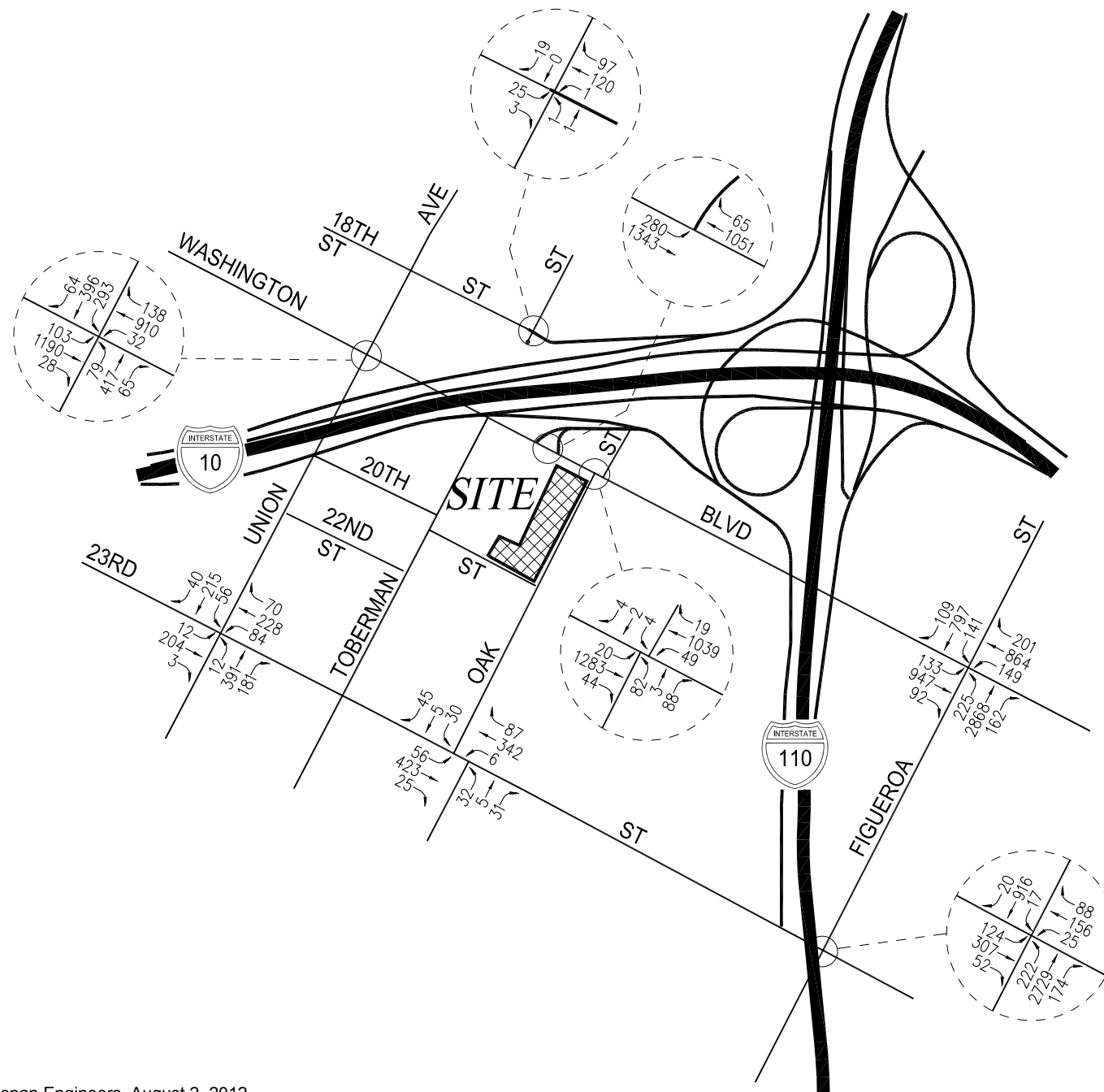
No.	Intersection	Peak Hour	Without Project		With Project		Change	Significant Impact?
			CMA	LOS	CMA	LOS		
1.	Union Avenue/Washington Boulevard	AM	0.770	C	0.771	C	0.001	No
		PM	0.759	C	0.765	C	0.006	No
2.	Union Avenue/23 <sup>rd</sup> Street	AM	0.581	A	0.589	A	0.008	No
		PM	0.591	A	0.600	A	0.009	No
3.	Toberman Street/18 <sup>th</sup> Street – I-110 Freeway SB Off-Ramp	AM	0.127	A	0.127	A	0.000	No
		PM	0.079	A	0.080	A	0.001	No
4.	I-110 Freeway SB On-Ramp/ Washington Boulevard	AM	0.543	A	0.544	A	0.001	No
		PM	0.668	B	0.669	B	0.001	No
5.	Oak Street/Washington Boulevard	AM	0.337	A	0.346	A	0.009	No
		PM	0.300	A	0.307	A	0.007	No
6.	Oak Street-Scarff Street/ 23 <sup>rd</sup> Street	AM	0.289	A	0.298	A	0.009	No
		PM	0.261	A	0.277	A	0.016	No
7.	Figueroa Street/ Washington Boulevard	AM	0.914	E	0.914	E	0.000	No
		PM	0.990	E	0.998	E	0.008	No
8.	Figueroa Street/23 <sup>rd</sup> Street	AM	0.654	B	0.657	B	0.003	No
		PM	0.869	D	0.878	D	0.009	No

*Source: Linscott, Law & Greenspan, Engineers, Supplemental Traffic Analysis, August 2, 2012.*

***Neighborhood Intrusion***

Implementation of the Project in conjunction with the related projects listed referenced previously and the ambient regional traffic growth projections described previously would result in a net increase in traffic in the study area. As discussed previously, none of the Project's traffic would distribute to neighborhood streets. Thus, the Project does not have the potential to contribute to any possible cumulative impact related to neighborhood intrusion. Therefore, the Project's contribution to any possible cumulative neighborhood intrusion impact would not be considerable.

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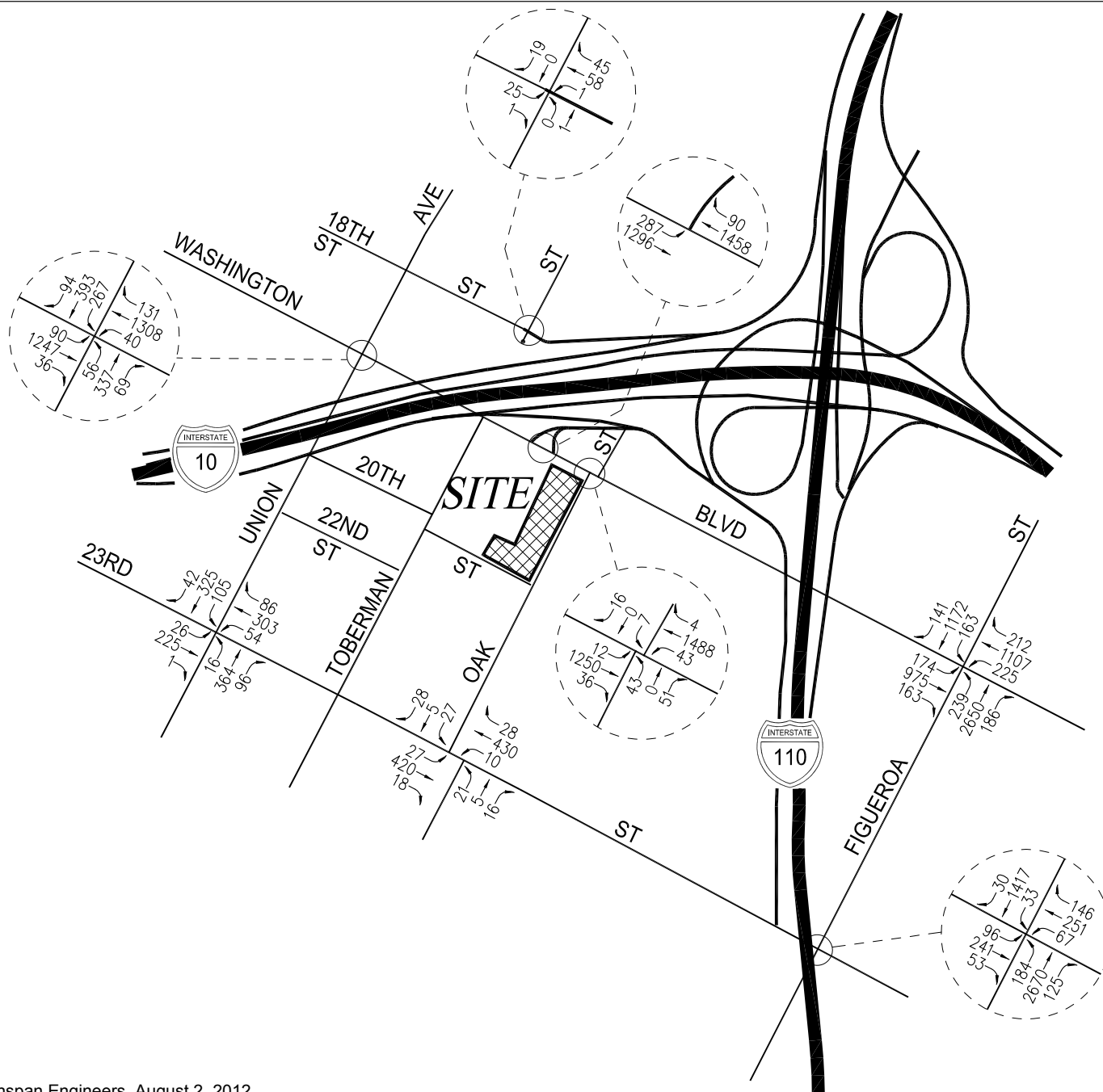
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***Bicycle, Pedestrian, and Vehicular Safety***

Implementation of the Project in conjunction with the related projects referenced previously and the ambient regional traffic growth projections described previously would result in a net increase in traffic in the Project area. However, no other related projects are located in proximity to the site of the proposed Project. Thus, the potential for cumulative traffic conflicts to occur would be minimal. Additionally, the Project includes safety measures that would minimize potential bicycle, pedestrian, and vehicular conflicts, and impacts would be less than significant. Applicants of other projects in the City would be required to incorporate safety measures (i.e., signage, lighting). Therefore, cumulative impacts related to bicycle, pedestrian, and vehicular safety would be less than significant.

***Transit***

Implementation of the Project in conjunction with the related projects referenced previously and the ambient regional traffic growth described previously could result in a net increase in demand for transit service near the Project site. Pursuant to the CMP requirements, the estimated number of transit trips that would be generated by the Project was calculated using values set forth in the CMP. The Project would generate approximately 2 net transit trips during the morning peak hour; 3 net transit trips during the afternoon peak-hour; and 24 net daily transit trips. The 31 buses during the morning peak hour and the 30 buses during the afternoon peak hour would be more than adequate to accommodate the transit trips generated by the Project, and impacts would be less than significant. Therefore, the Project's contribution to any potential increase in cumulative demand for transit service in the area would not be considerable, and cumulative impacts would be less than significant.

***Parking***

As discussed previously, the amount of parking included as part of the Project would meet the City's parking requirements for the Project, and no significant parking impacts would occur. The degree to which the related projects meet applicable parking requirements will be determined on a case-by-case basis. However, regardless of whether the related projects provide enough parking to meet parking requirements, because the Project would provide sufficient parking, the Project would not have the potential to contribute to any potential parking shortages associated with the related projects. Therefore, cumulative parking impacts would be less than significant.

***In-Street Construction***

None of the related projects are located in proximity to the Project site, and as such, any concurrent construction activities would not result in overlapping construction zones. Additionally, as discussed previously, Project impacts related to in-street construction would be less than significant. Therefore, cumulative impacts related to in-street construction also would be less than significant.

## **MITIGATION MEASURES**

To ensure that the Project would not result in any significant impacts related to bicycle, pedestrian, and vehicular safety, the following mitigation measures are required:

- K-1: Prior to construction, the Project Applicant shall contact LAUSD Transportation Branch at (323) 342-1400 regarding potential impact to school bus routes.
- K-2: Unrestricted access for school buses shall be maintained during all phases of Project construction.
- K-3: All construction workers shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.
- K-4: The Project Applicant shall not interfere with passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- K-5: The Project Applicant shall maintain safe and convenient pedestrian routes to LAUSD schools.
- K-6: The Project Applicant shall maintain ongoing communication with school administration at Norwood Street Elementary and Downtown Value Schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school could be affected.
- K-7: During the Project's construction phase, the Project Applicant shall not haul past affected school sites, except when school is not in session. If that is infeasible, the Project Applicant shall not haul during school arrival and dismissal times.
- K-8: The Project Applicant shall not stage or park construction-related vehicles, including worker-transport vehicles, adjacent to school sites.
- K-9: The Project Applicant shall provide crossing guards when safety of students could be compromised by construction-related activities at impacted school crossings.
- K-10: The Project Applicant shall install barriers and/or fencing around the Project site to secure construction equipment and the site to prevent trespassing, vandalism, and attractive nuisances.

K-11: During the Project's construction phase, the Project Applicant shall provide security patrols of the Project site to minimize trespassing, vandalism, and short-cut attractions.

K-12: During the Project's construction phase, the Project Applicant shall identify pedestrian and bicycle routes near the Project site and plan for safe detour of these routes.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With implantation of Mitigation Measures K-1 through K-12, Project impacts related to bicycle, pedestrian, and vehicular safety would be less than significant. All other traffic impacts would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### L. UTILITIES

#### 1. WASTEWATER

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#### ENVIRONMENTAL SETTING

##### Regulatory Setting

##### *Collection System Settlement Agreement*

During February 1998, the wettest February in Los Angeles' history, sanitary sewer overflows (SSOs) occurred in a number of communities with the majority occurring in the Eagle Rock and South Los Angeles areas. In response to these SSOs, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Cease and Desist Order (CDO) requiring construction of several new sewer lines to prevent additional wet weather overflows. These projects were to be completed within seven years and approached a cost of \$600 million. During the same time period, the Santa Monica Baykeeper (BayKeeper) filed a Federal lawsuit against the City asking for injunctive relief due to the SSOs. In January 2001, the U.S. Environmental Protection Agency (USEPA), the LARWQCB and a number of community groups representing residents in South Los Angeles joined the BayKeeper in its lawsuit against the City.

The plaintiffs alleged that the City's SSOs and odor problems violated the Clean Water Act and the terms and conditions of the National Pollutants Discharge Elimination System (NPDES) Permits for the Hyperion and the Terminal Island Treatment Plants for the operation and maintenance of the City's sewer system. With the City's enhancements to its sewer system and renewed commitment by all parties to reach a manageable settlement that would protect neighborhoods and improve water quality throughout Los Angeles, the parties were able to reach this landmark settlement in August 2004. The objectives of the Collection System Settlement Agreement (CSSA) were to resolve the pending consolidated litigation; to set out a program that the City would implement to reduce SSOs through a comprehensive program of sewer cleaning, upgrades, and repairs; and to investigate, resolve, and mitigate sewer odors to the maximum extent practicable. The CSSA was signed by all parties and approved by the United States Central District Court in 2004.<sup>1</sup> Annual progress reports are required for the duration of the CSSA, which shall terminate upon approval by plaintiffs of a final set of reports in 2014.<sup>2</sup>

In 2009, a modification to the CSSA was agreed upon that recognized sewer odors as being an ongoing and particularly significant problem in the South Los Angeles area. The modification's stipulations included, but were not limited to support of and coordination with an Odor Advisory Board,

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<sup>1</sup> City of Los Angeles Dept of Public Works Bureaus of Contract Administration, Engineering, Sanitation: CSSA Annual Report - Fiscal Year 2004/05 - <http://www.lacitysan.org/lasewers/cssa/arno1.pdf>

<sup>2</sup> CSSA Settlement Agreement Document - <http://www.lacitysan.org/lasewers/cssa/collection-system-settlement-agreement.pdf>



Neighborhood Liaison and Independent Odor Control Expert; the preparation and annual update of an Odor Master Plan; and parameters regarding the evaluation and construction of Air Treatment Facilities (ATFs) proposed in the South Los Angeles area.<sup>3</sup>

### ***Sewer System Management Plan (SSMP)***

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted the Statewide General Waste Discharge Requirements (WDRs) for publicly owned sanitary sewer systems with greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in California. Under WDRs, the owners of such systems (except private laterals) must report all sanitary sewer overflows (SSOs), develop and implement a written plan called a Sewer System Management Plan (SSMP) to control and mitigate SSOs, and make it available to any member of the public upon request in writing.

The sewer system for the City of Los Angeles consists of three separate sanitary sewer systems. The Hyperion Sanitary Sewer System serves the majority of Los Angeles; Terminal Island covers the Harbor area; and the City of Los Angeles Regional Sanitary System serves the Gateway communities in between.

To comply with the State Waste Discharge Requirements, the City began reporting SSOs by the due date of January 2, 2007. A SSMP was prepared for each of the three sanitary sewer systems and approved by the City's Board of Public Works on February 18, 2009.<sup>4</sup>

### ***Integrated Resources Plan***

The City's sewer system is subject to Section 201 of the Federal Clean Water Act (CWA). According to the CWA, the City must adopt a wastewater facilities plan in accordance with the United States Environmental Protection Agency (EPA) Rules and Regulations, 40 CFR, Section 35.917. Section 201 specifies the following:

*Facilities planning will demonstrate the need for facilities and, by a systematic evaluation of feasible alternatives, will also demonstrate that the proposed measures represent the most cost-effective means of meeting established effluent and water quality goals while recognizing environmental and social considerations.*

The City first prepared a Wastewater Facilities Plan (WFP) in 1982 and updated it in 1991. In 2006, a revised WFP was incorporated into a more comprehensive Integrated Resource Plan (IRP), the result of an extensive collaborative effort involving multiple departments, stakeholder involvement and public input. The IRP was developed to accommodate the projected population growth and resulting increase in

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<sup>3</sup> First Modification to the CSSA - [http://www.lacitysan.org/lasewers/cssa/PDFs/Modification\\_courtenry\\_11-12-09.pdf](http://www.lacitysan.org/lasewers/cssa/PDFs/Modification_courtenry_11-12-09.pdf)

<sup>4</sup> City of Los Angeles Bureau of Sanitation - <http://www.lacitysan.org/lasewers/ssmp/index.htm>

wastewater flow while maximizing the beneficial use of recycled water and urban runoff by integrating planning for three interdependent water systems: wastewater, recycled water and stormwater. Demographic (population and employment) projections and data sources used in the IRP were based on the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan (RTP), which estimated that the population of Los Angeles would reach almost 4.9 million by 2020.

Phase I of the IRP included a gap analysis of the existing city-wide system's capability to meet future demand and the development of preliminary alternatives to address those identified gaps. Phase II involved the selection and comparison of preliminary alternatives and included the development of an Environmental Impact Report (EIR), a Financial Plan, a Public Outreach Program, and a five-volume Facilities Plan. Implementation of the adopted IRP's improvements is dependent on monitored triggers, including population growth, recycled water regulations, wastewater discharge regulations, Total Maximum Daily Load (TMDL) requirements, available funding, etc. This staging of projects enables the City to target the most critical and immediate wastewater treatment needs. With full implementation of the IRP, the LADPW and Bureau of Sanitation expect to provide ample wastewater treatment services to the City and contracting cities through the year 2020.<sup>5</sup>

### ***City of Los Angeles General Plan***

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

### ***City of Los Angeles Municipal Code***

LAMC Sections 64.11 and 64.12 require approval of a sewer permit (S-Permit) prior to connection to the sewer system. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Fees paid to the Sewerage Facilities Charge are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to industrial waste control and water reclamation purposes. The Board of Public Works may also permit a subdivider to install off-site sewers in lieu of all or part of the sewerage facilities charge based on the actual cost of said off-site sewer.

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<sup>5</sup> City of Los Angeles Bureau of Sanitation, *IFP Facilities Plan Executive Summary-Overview of the IRP*. [http://www.lacitysan.org/irp/documents/Executive\\_Summary-Overview\\_of\\_the\\_IRP.pdf](http://www.lacitysan.org/irp/documents/Executive_Summary-Overview_of_the_IRP.pdf)

Section 64.15 of the LAMC requires that the City perform a Sewer Capacity Availability Review (SCAR) when any person seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity to safely convey the newly generated sewage to the appropriate sewage treatment plant.

In addition, the Bureau of Engineering Special Order No. SO06-0691 sets forth design criteria for sewer systems. Specifically, the order states that trunk, interceptor, outfall, and relief sewers (i.e. sewers that area 18 inches or greater in diameter) be designed for a planning period of 60-100 years and lateral sewers (sewers less than 18 inches in diameter) be designed for a planning period of 100 years. The order also requires that sewers be designed so that the peak dry weather flow (PDWF) depth, during their planning period, shall not exceed one-half (i.e., 50 percent) the pipe diameter.

## **Existing Conditions**

### ***Wastewater Collection System***

Los Angeles operates and maintains the largest wastewater collection system in the United States. The City's wastewater collection system includes approximately 6,500 miles of major interceptors and mainline sewers, 46 pumping plants, and various other support facilities, such as maintenance yards and diversion structures. Approximately 650 miles of the City's sewers are primary sewers, which by definition range in size from 16-inches to over 12½ feet in height or diameter. The rest of the sewers (approximately 5,850 miles) are smaller secondary sewers that by definition range in diameter from 6-inches to 15-inches.<sup>6</sup>

### ***Wastewater Treatment Facilities***

The project is located in the Hyperion Service Area (HSA), which covers about 600-square miles total, including contract agencies outside of the City and roughly 90 percent of the 465-square miles within the City limits. Within the HSA are three wastewater treatment facilities operated by the City of Los Angeles and two operated by outside agencies. Wastewater from the project site flows to the Hyperion Treatment Plant (HTP), which serves the central Los Angeles area, treats excess flows from the San Fernando Valley and Glendale/Burbank area, and processes solids from all other treatment facilities within the HSA.

The HTP is a full-secondary, high-purity-oxygen, activated sludge treatment plant with unchlorinated ocean discharge. HTP was designed to provide full secondary treatment for a maximum-month flow of

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<sup>6</sup> [http://www.lacitysan.org/irp/documents/Summary\\_Report-Brief\\_Description\\_of\\_Key\\_Facilities\\_Planning.pdf](http://www.lacitysan.org/irp/documents/Summary_Report-Brief_Description_of_Key_Facilities_Planning.pdf)

450 mgd. It currently treats approximately 362 MGD.<sup>7</sup> As such, the HTP is currently operating at approximately 80-percent of its capacity, with an available capacity of roughly 88 MGD. Biosolids removed during treatment of the wastewater are treated by anaerobic digestion, and are then dewatered and trucked offsite for use through a diversified management plan utilizing 100 percent beneficial use. The biosolids produced at HTP are Class “A.”<sup>8</sup>

The HSA also includes the Tillman Water Reclamation Plant (TWRP) and the LA-Glendale Water Reclamation Plant (LAGWRP). The TWRP has a capacity of 80 MGD and currently receives 67 MGD. The IRP recommended alternative includes expanding the TWRP to 100 MGD. The LAGWP has a capacity of 20 MGD and receives 20 MGD.<sup>9</sup> Thus the HSA has a total system capacity of 550 MGD and receives 449 MGD.

### ***Project Site Conditions***

The City of Los Angeles (the “City”) Department of Public Works Bureau of Sanitation (BOS) maintains the conveyance infrastructure in the Project area that includes a 12-inch line on Washington Boulevard and an 8-inch line on Oak Street. Wastewater from the existing 12-inch line flows into a 20-inch line on Union Avenue and continues into a 24-inch line in Hoover Street. Wastewater from the existing 8-inch line feeds into a 10-inch line on Scarff Street and continues into a 12-inch line on Severance Street. Both the 12-inch and 24-inch lines connect at the intersection of University Avenue and 30<sup>th</sup> Street and feed into a 24-inch line on University Avenue. The sewage then splits at the intersection of University Avenue and Jefferson Boulevard, discharging into a 48-inch line on University Avenue and a 40-inch line on University Avenue.<sup>10</sup> Additional information about the wastewater infrastructure serving the Project area is presented on Table IV.L-1. The Project site is currently developed with a 12,218 square-foot catering facility and parking lot, which generates approximately 1,389 gallons of wastewater per day (refer to Table IV.L-2).

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<sup>7</sup> Bureau of Sanitation, About Wastewater: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed September 5, 2012.

<sup>8</sup> [http://www.lacitysan.org/irp/documents/Summary\\_Report-Brief\\_Description\\_of\\_Key\\_Facilities\\_Planning.pdf](http://www.lacitysan.org/irp/documents/Summary_Report-Brief_Description_of_Key_Facilities_Planning.pdf)

<sup>9</sup> Bureau of Sanitation, About Wastewater: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed September 5, 2012.

<sup>10</sup> Written correspondence with Brent Lorscheider, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, dated April 30, 2009

**Table IV.L-1  
Wastewater Infrastructure Serving the Project Area**

<b>Pipe Location</b>	<b>Pipe Diameter (inches)</b>	<b>Current Gauging d/D (%)</b>	<b>50% Design Capacity</b>
Washington Boulevard	12	No gauging available	676,120 gpd
Union Avenue	20	52	2.00 mgd
Hoover Street	24	38	3.53 mgd
Oak Street	8	No gauging available	294,570 gpd
Scarff Street	10	50	436,684 gpd
Severance Street	12	49	623,352 gpd
University Avenue	24	41	4.07 mgd
University Avenue	48	46	18.29 mgd
University Avenue	40	43	9.56 mgd
<i>d/D = ratio of flow depth to pipe diameter      gpd = gallons per day      mgd = million gallons daily</i> <i>Source: Written correspondence with Brent Lorscheider, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, March 23, 2009, April 21, 2009 and April 30, 2009.</i>			

**Table IV.L-2  
Existing Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup></b>	<b>Generation (gpd)</b>
Commercial	12,218 sf	80 gallons/1,000 sf/day	977
Parking	20,595 sf	20 gallons/1,000 sf/day	412
<b>Total</b>			<b>1,389</b>
<sup>a</sup> City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.			

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the project would result in the following:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

### ***L.A. CEQA Thresholds Guide***

In the context of these State CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that 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.

### **Project Impacts**

#### ***Wastewater Treatment***

Based on calculations provided by the BOS, the proposed Project would generate a net increase of approximately 24,795 gallons of wastewater per day (refer to Table IV.L-3). As discussed previously, the HTP has a treatment capacity of 450 MGD and currently treats 362 MGD. Along with the TWRP and the LAGWRP, the HSA has a capacity 550 MGD and a current surplus of 101 MGD. The IRP predicts that average flow within the HSA to increase to 492.3 MGD by 2015 and 511.5 MGD by 2020.<sup>11</sup> Thus, even without any of the planned or proposed expansions of facilities as described in the IRP, the HSA would have a remaining capacity of 39 MGD by 2020. As such, the HSA has adequate capacity to serve the wastewater treatment needs of the proposed Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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<sup>11</sup> Table 2-5 in the IRP Summary Report: [http://www.lacitysan.org/irp/documents/Summary\\_Report-Brief\\_Description\\_of\\_Key\\_Facilities\\_Planning.pdf](http://www.lacitysan.org/irp/documents/Summary_Report-Brief_Description_of_Key_Facilities_Planning.pdf)

**Table IV.L-3  
Proposed Project Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup></b>	<b>Total Generation (gpd)</b>
4 Bedroom Townhome	8 du	280 gallons/du/day	2,240
1 Bedroom Condo	32 du	120 gallons/du/day	3,840
2 Bedroom Condo	76 du	160 gallons/du/day	12,160
3 Bedroom Condo	24 du	200 gallons/du/day	4,800
4 Bedroom Condo	2 du	240 gallons/du/day	480
Parking	133,193 sf	20 gallons/1,000 sf/day	2,664
<b>Project Total</b>			<b>26,184</b>
<i>Less Existing</i>			<i>1,389</i>
<b>Net Total</b>			<b>24,795</b>
<i>du=dwelling unit      sf=square feet      gpd = gallons per day</i> <sup>a</sup> City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit M.2-11 and written correspondence with Brent Lorscheider, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, March 23, 2009, April 21, 2009 and April 30, 2009.			

### ***Wastewater Conveyance Infrastructure***

According to BOS, the existing flow capacity of the wastewater conveyance infrastructure that serves the Project site might be adequate to serve the needs of the proposed Project.<sup>12</sup> However, detailed gauging was unavailable for lines on Washington Boulevard and Oak Street, the two most likely connection points to the city sewer system, and as such, further detailed gauging and evaluation may be needed as part of the S-permit process to identify a sewer connection point. BOS would require the Project Applicant to conduct detailed gauging to determine the adequacy of the wastewater conveyance infrastructure to serve the proposed Project. If the public sewer has insufficient capacity then the Project Applicant would be required to install sewer lines to a point in the sewer with sufficient capacity. Therefore, Project impacts related to wastewater conveyance infrastructure would be less than significant.

### **CUMULATIVE IMPACTS**

As shown in Table IV.L-4, the proposed Project, in conjunction with related projects identified in this EIR (see Table II-1) would result in net cumulative increases in wastewater generation of 4.25 MGD.

Increased wastewater flows throughout the HTS are addressed in the IRP, which has determined that existing wastewater processing facilities are sufficient to handle projected flows through 2020. The IRP

<sup>12</sup> Los Angeles Department of Public Works Bureau of Sanitation, Brent Lorscheider, Division Manager, May 2009 (refer to Appendix IV.L).

provides for development of additional wastewater treatment if triggered by an increase in population (beyond what is projected), regulations, and/or groundwater replenishment needs. These “Go-If-Triggered” projects include the potential expansion and upgrade of the TWRP to accommodate up to 100 MGD of wastewater.<sup>13</sup> If expansion of existing facilities is required, the environmental impacts of this activity have already been addressed in the Draft and Final EIRs prepared for the IRP, which are hereby incorporated by reference.<sup>14</sup>

**Table IV.L-4**  
**Cumulative Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup> (gallons per day)</b>	<b>Generation (gallons per day)</b>
Multi-Family Residential	18,264 du	160/du	2,922,240
Office	2,799,325 sf	150/1,000 sf	419,899
Retail	945,669 sf	80/1,000 sf	75,653
Restaurant	130,227 sf	300/1,000 sf	39,068
Cinema	43,000 sf	80/1,000 sf	3,440
Hotel	1,390 rooms	130/room	180,700
Health Club	131,130 sf	800/1,000 sf	104,904
Educational	2,816,700 sf	150/1,000 sf	422,505
Stadium	360,000 sf	150/1,000 sf	54,000
Museum	77,100 sf	80/1,000 sf	6,168
<i>Related Projects Total</i>			<i>4,228,577</i>
<b>Total Proposed Project</b>			<b>24,795</b>
<b>Total Cumulative</b>			<b>4,253,372</b>
<i>du = dwelling unit      sf = square feet</i> <sup>a</sup> <i>City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit M.2-12, Sewage Generation Factors</i>			

As discussed previously, the HTP has a treatment capacity of 450 MGD and currently treats 362 MGD. Along with the TWRP and the LAGWRP, the HSA has a capacity 550 MGD and a current surplus of 101 MGD. The IRP predicts that average flow within the HSA to increase to 492.3 MGD by 2015 and 511.5 MGD by 2020.<sup>15</sup> Thus, even without any of the planned or proposed expansions of facilities as described in the IRP, the HSA would have a remaining capacity of 39 MGD by 2020. As such, the HSA has adequate capacity to serve the wastewater treatment needs of the cumulative generation (Proposed Project

<sup>13</sup> City of Los Angeles, *Integrated Resources Plan, Executive Summary*, December 2006, page 15.

<sup>14</sup> City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, *Integrated Resources Plan, Draft (November 2005) and Final (September 2006) Environmental Impact Reports*, certified November 14, 2006. These documents are available for review during normal business hours at the Department of City Planning, City of Los Angeles, City Hall, 200 N Spring St, Room 601, Los Angeles, CA 90012.

<sup>15</sup> Table 2-5 in the IRP Summary Report: [http://www.lacitysan.org/irp/documents/Summary\\_Report-Brief\\_Description\\_of\\_Key\\_Facilities\\_Planning.pdf](http://www.lacitysan.org/irp/documents/Summary_Report-Brief_Description_of_Key_Facilities_Planning.pdf)



plus related projects). Therefore, cumulative impacts related to wastewater treatment would be less than significant.

Similar to the proposed Project, the applicants of each of the related projects would be required to obtain a final approval from BOS for a sewer capacity connection permit. The sewer line capacity for each related project would be evaluated on a case-by-case basis, and any upgrades that could be needed would be implemented prior to issuance of any occupancy permits. Therefore, cumulative impacts to wastewater conveyance infrastructure would be less than significant.

## **MITIGATION MEASURES**

No significant impacts related to wastewater service have been identified, and no mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to wastewater service would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### L. UTILITIES

#### 2. WATER

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#### ENVIRONMENTAL SETTING

##### Regulatory Setting

The California Urban Water Management Planning Act requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, dry, and multiple-dry years. In an UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area.

##### *Los Angeles Department of Water and Power (LADWP)*

##### *2010 Urban Water Management Plan (UWMP)<sup>16</sup>*

The LADWP 2010 UWMP was adopted in July 2011. The main goal of the UWMP is to forecast future water demands and water supplies under average and dry year conditions, identify future water supply projects such as recycled water, provide a summary of water conservation best management practices (BMPs), and provide a single and multi-dry year management strategy. Since the 2005 UWMP, LADWP released its Water Supply Action Plan in 2008 to address the water reliability issues associated with the lowest snowpack on record in the Sierra Nevada (in 2007), the driest year on record for the Los Angeles Basin (in 2007), increased water for environmental mitigation and enhancement in the Owens Valley, San Fernando Groundwater Basin contamination, and reduced imported water from the Bay-Delta due to a prolonged water shortage and environmental restrictions on Delta exports. Also, a number of new requirements were added to the Urban Water Management Planning Act, such as addressing California's new mandate of reducing per capita water use by 20 percent by the year 2020. Finally, LADWP developed a new water demand forecast based on a more rigorous analysis of water use trends and measurement of achieved water conservation.

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<sup>16</sup> LADWP 2010 Urban Water Management Plan: [http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP\\_2010\\_LowRes.pdf](http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf), accessed June 2013.

*Securing L.A.'s Water Supply Plan (2008)<sup>17</sup>*

The City of Los Angeles Water Supply Action Plan known as the Securing L.A.'s Water Supply Plan was released by the Mayor's Office in May 2008. The premise of this Water Supply Plan is that the City will meet all new demand for water, about 100,000 acre-feet per year (AFY), through a combination of water conservation and water recycling. In total, the City will conserve or recycle 32.6 billion gallons of water. By the year 2019, half of all new demand will be filled by a six-fold increase in recycled water supplies and by 2030 the other half will be met through ramped-up conservation efforts. The information in the Water Supply Plan informs the 2010 UWMP.

***Metropolitan Water District (MWD)****2010 Regional Urban Water Management Plan (RUWMP)*

The 2010 RUWMP was released in November 2010. The RUWMP represents current planning projections of supply capability and demand, as well as water reliability under a single dry-year, multiple dry-years, and average year conditions in five-year increments for 20 years.

*2010 Integrated Water Resources Plan (IWRP)*

The 2010 IWRP was approved by the MWD Board on October 12, 2010 and is the strategic plan for water reliability through 2035.

*1999 Water Surplus and Drought Management Plan (WSDMP)*

The WSDMP was released in August 1999 and is a 10-year plan to direct resources to attain 100 percent reliability goal. The WSDMP categorizes its ability to deliver water to its customers by distinguishing between surpluses, shortages, severe shortages and extreme shortages. The information in the WSDMP informs the 2010 RUWMP and 2010 IWRP.

***State Regulations***

State of California Senate Bill (SB) 610 and 221 became effective January 1, 2002, amending sections 10910 - 10915 of the State Water Code, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written verification of sufficient water supply to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, projects that are required to obtain water supply assessments include the following:

- a proposed residential development of more than 500 dwelling units;

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<sup>17</sup> *Securing L.A.'s Water Supply:*  
[http://mayor.lacity.org/stellent/groups/ElectedOfficials/@MYR\\_CH\\_Contributor/documents/Contributor\\_Web\\_Content/LACITY\\_004714.pdf](http://mayor.lacity.org/stellent/groups/ElectedOfficials/@MYR_CH_Contributor/documents/Contributor_Web_Content/LACITY_004714.pdf)

- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- a mixed-use project that falls in one or more of the above identified categories; or
- a project not falling in one of the above-identified categories, but that would demand water equal or greater to a 500 dwelling unit project.

### ***Los Angeles Municipal Code (LAMC)***

Water use in the City is currently approximately equal to the water use in the City 20 years ago despite an increase in population of over 750,000 persons during this period.<sup>18</sup> This stability in water use is mostly attributed to the City's public education campaigns and water conservation programs over the past 15 years. In addition to conformance with SB 610 and SB 221, the LADWP has instituted its own City level water conservation measures, which include the following:

- "Water Closet, Urinal and Showerhead Regulations" (LAMC Sections 122.00–122.10) – Reduces water consumption by requiring new buildings to include water conservation fixtures (such as ultra-low flush toilets, urinals, taps, and showerheads) and plumbing fixtures that reduce water loss from leakage in order to obtain City building permits. In addition, there are provisions requiring xeriscaping (i.e., the use of low-maintenance, drought-resistant plants).
- "The Emergency Water Conservation Plan of the City of Los Angeles" (LAMC Sections 121.00-121.13) – Provides for the implementation of a citywide phased water conservation program to respond to dry weather periods based on the LADWP's evaluation of the projected supply and demand of City water supplies. The phased conservation program provides for mandatory water conservation measures at the user level and customer use curtailment of normal water usage.

Chapter XII of the LAMC describes the water conservation plan of the City of Los Angeles. Article V describes the water efficiency requirements for new development and renovation of existing buildings. Section 125.03 requires:

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<sup>18</sup> City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, Page ES-3.

- (a) **Toilets.** All toilets installed shall be high efficiency fixtures. The maximum flush volume for high efficiency toilets shall not exceed 1.28 gallons of water (effective) per flush (gpf).
- (b) **Urinals.** All urinals installed shall be high efficiency fixtures. The maximum flush volume of high efficiency urinals shall not exceed 0.5 gallon of water per flush. Effective October 1, 2010, the maximum flush volume of high efficiency urinals shall not exceed 0.125 gallon of water per flush.
- (c) **Faucets.** All faucets in public restrooms must be self closing. The flow rate for all indoor faucets shall be 2.2 gallons per minute (gpm) except as follows:
- The maximum flow rate for private or private use lavatory faucets shall be 1.5 gpm (5.6 Lpm).
  - The maximum flow rate for public use lavatory faucets, shall be 0.5 gpm. Exception: Metering faucets shall deliver not more than 0.25 gallon (1.0 liter) of water per cycle.
  - The maximum flow rate for a pre-rinse spray valve installed in a commercial kitchen to remove food waste from cookware and dishes prior to cleaning shall be 1.6 gpm (6.0 Lpm).
- (d) **Showerheads.** All showerheads must be low flow with a maximum flow rate that does not exceed 2.0 gallons per minute. This requirement shall not apply to any emergency showerhead installed for health or safety purposes.
- (e) **Dishwashers.**
1. The maximum water use for high efficiency commercial dishwashers shall be:  
  
Conveyer - 0.70 gallons per rack for high-temperature maximum and 0.62 gallons per rack for chemical-maximum;  
  
Door – 0.95 gallons per rack for high-temperature maximum and 1.16 gallons per rack for chemical-maximum;  
  
Undercounter – 0.90 gallons per rack for high-temperature maximum and 0.98 gallons per rack for chemical-maximum
  2. The maximum water use per washing cycle for high efficiency domestic dishwashers shall be 5.8 gallons.
- All installed dishwashers must be Energy Star® rated.
- (f) **Cooling Towers.** All cooling towers must be operated at a minimum of 5.5 cycles of concentration.

- (g) **Use of Single Pass Cooling Systems.** Single pass cooling systems are strictly prohibited for use in devices, processes, or equipment installed in commercial, industrial, or multi family residential buildings. This prohibition shall not apply to devices, processes, or equipment installed for health or safety purposes that cannot operate safely otherwise.

## Existing Conditions

### Regional Water Supplies

#### LADWP Water Supplies

##### Existing Sources and Supplies

Primary sources of water are the Los Angeles Aqueducts (LAA), local groundwater, purchased imported water from MWD, and recycled water. MWD imported water comes from the Bay Delta via the State Water Project (SWP) and from the Colorado River via the Colorado River Aqueduct (CRA). As shown in Table IV.L-5, local water supplies and new water conservation are projected to increase from the current 12 percent to 43 percent by 2035. This increased local supply mix will allow LADWP to reduce by half its MWD water supply purchases.

**Table IV.L-5**  
**Current and Projected Mix of LADWP Water Supplies**

<b>Water Source</b>	<b>2010 AFY (%)</b>	<b>2035 AFY (%)</b>
LA Aqueduct	221,289 (36)	244,000 (33)
MWD	326,012 (52)	168,027 (24)
Groundwater	71,087 (11)	110,405 (16)
Recycled Water	5,072 (1)	59,000 (8)
Water Transfers	-	64,368 (9)
Stormwater Capture	-	25,000 (4)
Conservation	-	40,000 (6)
<b>Total</b>	<b>621,700</b>	<b>71,800</b>
<i>Table does not reflect 100,000 AFY of existing conservation.</i> <i>Percentages are rounded. AFY = acre-feet per year</i> <i>Source: Exhibit ES-Q, pg 19, LADWP 2010 Urban Water Management Plan.</i> <i>Table by CAJA Environmental Services, July 2011.</i>		

#### (a) Los Angeles Aqueducts

LAA provided 36 percent of total water supplies during 2009-10. Half the LAA water (205,800 acre feet [AF]) is used for environmental mitigation and enhancement in the Owens Valley and Mono Basin and 107,300 AFY is for agricultural, stockwater, and Native American Reservations. LADWDWP relies upon a complex water system network that delivers water from the eastern Sierra Nevada watershed (via the

first and second Los Angeles Aqueduct), the Sacramento and San Joaquin Rivers (via the California Aqueduct), and the Colorado River (via the Colorado River Aqueduct).

**(b) Local Groundwater**

Local groundwater provides 12 percent of total water supplies (historically up to 30 percent during droughts when imported supplies are unreliable).

**(c) MWD**

MWD provided a 5-year average of 52 percent of total water supplies between 2005-6 and 2009-10. This has ranged from 4 percent (1983-4) to 71 percent (2008-9) depending on the dry or wet weather year.

**(d) Recycled Water**

The City also supplies recycled water for landscaping and industrial uses throughout the City and comprises less than 1 percent of total supplies. LADWP directly receives recycled water from three wastewater treatment plants operated by Bureau of Sanitation (BOS), two of which provide recycled water treated to a tertiary level: Los Angeles Glendale (LAG) Treatment Plant and Donald C. Tillman (DCT) Treatment Plant. The Terminal Island Treatment Plant (TITP) performs advanced treatment in addition to tertiary treatment. LADWP also directly receives a small portion of recycled water from the West Basin Municipal Water District (WBMWD), which provides additional treatment of wastewater from the Hyperion Treatment Plant (HTP) in El Segundo.

Supply Capabilities and Projected Demands

In 2009-10, the per capital water use was 117 gallons per day (gpd), a substantial drop off from 1980 (173 gpd) due to mandatory conservation and a server economic recession.<sup>19</sup> Water demand is based on demographics (population, housing, and employment), implementation fo water conservation programs, behavioral practices of water users, and weather. The LADWP service area, which includes all of the City of Los Angeles, portions of the cities of West Hollywood, Culver City, and small areas of the County of Los Angeles (such as Universal City) includes 4.1 million people and 1.38 million homes. The Southern California Association of Governments (SCAG) projects 4.47 million people and 1.64 million homes by 2035.

Between 2005-10, the LADWP service area averaged 621,458 AFY, from the following land uses:

- Single-family: 236,154 AF (38 percent)
- Multi-family: 180,279 AF (29 percent)
- Commercial: (106,966 AF (17 percent)

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<sup>19</sup> LADWP, 2010 UWMP, pg. 38.

- Industrial: 23,201 AF (4 percent)
- Government: 42,940 AF (7 percent)
- Non-revenue: 31,929 AF (5 percent).

While the total water in AF can vary substantially from year to year, the percentage breakdown between the different uses does not. Table IV.L-6 shows the projections through 2035 with both passive and active water conservation measures. Passive measures include changes to the 2010 plumbing code. Active measures include low-flush toilets and plumbing fixtures, replacing turf with drought resistant landscaping, and programs, which promote industrial water use efficiency. Future water supplies will come from recycled water, stormwater capture, and water transfers. Recycled water is expected to increase to 59,000 acre-feet per year (AFY) by 2035. Stormwater capture can increase groundwater pumping rights in the San Fernando Basin of 15,000 AFY from groundwater recharge and 10,000 AFY from capture and reuse in rain barrels and cisterns for a total of 25,000 AFY by 2035. The LADWP has a goal to transfer up to 40,000 AFY once the Neenach Pumping Station facilities are in place. This will allow transfers from the East Branch of the SWP to the LAA. Other opportunities include seawater desalination and graywater systems for non-potable use.

### ***Supply Reliability***

With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2010 UWMP. Table IV.L-7 summarizes the water demands and supplies for an average weather year through 2035.

### ***MWD Water Supplies***

#### Existing Sources and Supplies

MWD obtains imported water from the Colorado River through the Colorado River Aqueduct and the SWP through the California Aqueduct. Approximately 50 percent of the water supply comes from local supplies such as groundwater basins, catchments of surface water, and non-MWD imported water through the LAA, and exchanges for Colorado River water. In 2010, the MWD water supply was 4,725,000 AF, as shown in Table IV.L-8

#### Supply Capabilities and Projected Demands

MWD has supply capabilities that would be sufficient to meet expected demands from 2015 through 2035 under the single dry-year and multiple dry-year conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to 50 percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD also developed an Emergency Storage Requirement to mitigate against potential



interruption in water supplies resulting from catastrophic occurrences within the Southern California region, including seismic events along the San Andreas Fault.

**Table IV.L-6**  
**Water Demand Forecast**

<b>Land Use</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
<b>Single Family</b>						
Passive	198,444	229,115	241,976	249,528	257,693	259,904
Active + Passive	196,500	225,699	236,094	241,180	246,879	247,655
Savings	1,944	3,416	5,882	8,349	10,815	12,249
<b>Multi Family</b>						
Passive	167,299	179,653	194,724	205,136	216,054	221,912
Active + Passive	166,810	178,782	193,220	202,999	213,284	218,762
Savings	489	871	1,504	2,137	2,770	3,150
<b>Commercial / Gov</b>						
Passive	135,000	143,081	149,597	153,791	158,628	160,049
Active + Passive	130,386	135,112	133,597	129,761	126,567	120,420
Savings	4,614	7,969	16,000	24,030	32,061	39,629
<b>Industrial</b>						
Passive	20,298	20,524	20,726	20,532	20,408	19,852
Active + Passive	19,166	18,600	16,852	14,708	12,634	10,513
Savings	1,132	1,924	3,874	5,824	7,774	9,339
<b>Non Revenue</b>						
Passive	33,515	42,421	44,989	46,617	48,380	49,042
Active + Passive	32,909	41,370	42,969	43,627	44,421	44,272
Savings	606	1,051	2,020	2,990	3,959	4,771
<b>Total</b>						
<b>Passive</b>	<b>554,556</b>	<b>614,794</b>	<b>652,012</b>	<b>675,604</b>	<b>701,164</b>	<b>710,760</b>
<b>Active + Passive</b>	<b>545,771</b>	<b>599,563</b>	<b>622,732</b>	<b>632,275</b>	<b>643,785</b>	<b>641,622</b>
<b>Savings</b>	<b>8,785</b>	<b>15,231</b>	<b>29,280</b>	<b>43,329</b>	<b>57,379</b>	<b>69,138</b>
<i>Amount in AFY</i>						
<i>Source: Exhibit ES-H, pg 10, LADWP 2010 Urban Water Management Plan.</i>						
<i>Table by CAJA Environmental Services, July 2011.</i>						

In addition, MWD is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region, such as a maximum probable seismic event in the Delta that would cause levee failure and disruption of SWP deliveries. MWD has plans for supply implementation and continued development of a diversified resource mix including programs in the CRA, SWP, Central Valley transfers, local resource projects, and in-region

storage that enables the region to meet its water supply needs.<sup>20</sup> Supplies projections are shown in Table IV.L-9. Table IV.L-10 summarizes the water demands and local supplies for an average year through 2035.

**Table IV.L-7**  
**LADWP Water Demands and Supplies (Average Weather Year)**

	2010	2015	2020	2025	2030	2035
Total Demand	555,477	614,800	652,000	675,600	701,200	710,800
Existing/Planned Supplies						
LAA	199,739	252,000	250,000	248,000	246,000	244,000
Groundwater	76,982	40,500	96,300	111,500	111,500	110,405
Conservation	8,178	14,180	27,260	40,340	53,419	64,368
Recycled Water						
Irrigation and Industrial Use	6,703	20,000	20,400	27,000	29,000	29,000
Groundwater Replenishment	0	0	0	15,000	22,500	30,000
Water Transfers	0	40,000	40,000	40,000	40,000	40,000
<i>Subtotal</i>	<i>291,602</i>	<i>366,680</i>	<i>433,960</i>	<i>481,840</i>	<i>502,419</i>	<i>517,773</i>
MWD	263,875	248,120	218,040	193,760	198,781	193,027
<b>Total Supplies</b>	<b>555,477</b>	<b>614,800</b>	<b>652,000</b>	<b>675,600</b>	<b>701,200</b>	<b>710,800</b>
<i>Amount in AFY</i>						
<i>Source: Exhibit ES-R, pg 20, LADWP 2010 Urban Water Management Plan.</i>						
<i>Table by CAJA Environmental Services, July 2011.</i>						

**Table IV.L-8**  
**MWD Source of Water Supply (2010)**

Local Supply	LAA	CRA	SWP	Total
1,832,000	243,000	1,150,000	1,500,000	4,725,000
<i>Amount in AF; LAA = Los Angeles Aqueduct; CRA = Colorado River Aqueduct, SWP = State Water Project</i>				
<i>Source: Table A.2-1, pg A.2-3, MWD 2010 Regional Urban Water Management Plan</i>				
<i>Table by CAJA Environmental Services, July 2011.</i>				

<sup>20</sup> pg ES-5, MWD 2010 Regional Urban Water Management Plan.

**Table IV.L-9  
MWD Local Supplies**

	2015		2025		2035	
	Average Yr	Dry Yr	Average Yr	Dry Yr	Average Yr	Dry Yr
Local Supplies <sup>1</sup>	2,301,000	2,078,000	2,454,000	2,243,000	2,502,000	2,300,000
CRA Supply <sup>2</sup>	1,507,000	1,416,000	1,472,000	1,669,000	1,432,000	1,419,000

*Amount in AFY, Yr = year, CRA = Colorado River Aqueduct*  
*Sources:*  
<sup>1</sup>Table I-5, pg 1-23, MWD 2010 Regional Urban Water Management Plan.  
<sup>2</sup> Average Yr data from Table 2-11, pg. 2-19, MWD, Regional Urban Water Management Plan.  
Dry Yr data from Table 2-9, pg. 2-17, MWD, Regional Urban Water Management Plan  
Table by CAJA Environmental Services, July 2011.

**Table IV.L-10  
MWD Water Demands and Local Supplies (Average Year)**

	2015	2020	2025	2030	2035
Total Demands	5,449,000	5,632,000	5,774,000	5,930,000	6,069,000
Total Conservation	936,000	967,000	1,033,000	1,096,000	1,156,000
SBx7-7 Water Conservation <sup>1</sup>	190,000	380,000	380,000	380,000	380,000
Total Local Supplies	2,395,000	2,522,000	2,553,000	2,581,000	2,603,000
Total MWD Demands <sup>2</sup>	1,928,000	1,763,000	1,808,000	1,874,000	1,931,000
Firm Demands on MWD	1,826,000	1,660,000	1,705,000	1,769,000	1,826,000

*Amount in AFY*  
<sup>1</sup>20 percent by 2020 retail-level compliance  
<sup>2</sup> Total MWD Demand = total demand - total conservation – SBx7-7 – total local supplies  
<sup>3</sup>Firm demand on MWD equals Full Service demands plus 70% of the Interim Agricultural Water Program demands  
Source: Table 2-8, pg 2-14, MWD 2010 Regional Urban Water Management Plan.  
Table by CAJA Environmental Services, July 2011.

### Supply Reliability<sup>21</sup>

Colorado River Aqueduct supplies are potentially available to supply additional water up to the CRA capacity of 1.25 million AF on an as-needed basis.

State Water Project (SWP) supplies equivalent to 134,000 AF, under a single dry-year (1977) condition and equivalent to 1.15 million AF, under long-term average condition. In dry, below-normal conditions, MWD has increased the supplies received from the California Aqueduct by developing flexible Central Valley storage and transfer programs.

<sup>21</sup> pg. ES-3, MWD 2010 Regional Urban Water Management Plan.

In the near-term, the physical and operational actions in the Bay-Delta being developed include measures that protect fish species and reduce supply impacts with the goal of reducing conflicts between water supply conveyance and environmental needs. The potential for increased supply due to these near-term fixes is included in the 2010 RUWMP as a 10 percent increase in water supplies obtained from the SWP allocation for the year. In evaluating the supply capabilities for the 2010 RUWMP, additional supplies from this interim fix are assumed to materialize by 2013.

Also included as a possible near-term fix for the Bay-Delta is the proposed Two-Gate System demonstration program, which would provide movable barriers on the Old and Middle Rivers to modify flows and prevent fish from being drawn toward the Bay-Delta pumping plants. The Two-Gate System is anticipated to protect fish and increase SWP supplies. Operational constraints likely will continue until a long-term solution to the problems in the Bay-Delta is identified and implemented. State and federal resource agencies and various environmental and water user entities are currently engaged in the development of the Bay Delta Conservation Plan (BDCP), which is aimed at addressing the basic elements that include the Delta ecosystem restoration, water supply conveyance, and flood control protection and storage

In evaluating the supply capabilities for the 2010 RUWMP, MWD assumed a new Delta conveyance is fully operational by 2022 that would return supply reliability similar to 2005 condition, prior to supply restrictions imposed due to the Biological Opinions. This assumption is consistent with Metropolitan's long-term Delta Action Plan that recognizes the need for a global, comprehensive approach to the fundamental issues and conflicts to result in a sustainable Bay-Delta, sufficient to avoid biological opinion restrictions on planned SWP deliveries to MWD and the other SWP Contractors.

In an actual shortage, MWD will take one or more of the following actions: (1) draw on storage out of reservoirs; (2) draw on out-of-region storage in the Semitropic and Arvin-Edison groundwater banks; (3) reduce or suspend long-term seasonal and groundwater replenishment deliveries; (4) draw on groundwater storage programs; (5) draw on SWP terminal reservoir storage; (6) call for voluntary conservation and public education; (7) reduce Interruptible Agricultural Water Program (IAWP) deliveries; (8) call on water transfer options contracts; (9) purchase transfers on the spot market; and (10) reduce imported supplies to its members agencies by an allocation method.

### ***Regional Water Treatment***

Much of the City's water flows from north to south, entering the City at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout LADWP's Water Service Area.

The LAAFP has a design capacity of 600 million gallons per day (MGD). The average plant flow is 450 MGD in non-summer months and 550 MGD during summer months. Groundwater quality is closely monitored by DWP to ensure that it meets both state and federal water quality standards. DWP monitors over 90 chemicals and bacteria. Water samples are also regularly collected and tested from watersheds, reservoirs, groundwater supply wells, storage facilities, and other locations. Treated water is conveyed

throughout the City by a system of 280 miles of trunk lines that act as the major arteries for water delivery; these trunk lines are 20-inches and greater in diameter.

### ***Project Site Conditions***

#### *Existing Water Infrastructure*

DWP provides water service to the Project site. Water conveyance infrastructure that serves the site includes a 16-inch cast iron main on Washington Boulevard, an 8-inch cast iron main on Oak Street, and a 4-inch cast iron main on 20<sup>th</sup> Street.<sup>22</sup>

#### *Existing Water Demand*

As shown on Table IV.L-11, existing uses at the Project site consume approximately 1,678 gallons of water per day.<sup>23</sup>

**Table IV.L-11**  
**Existing Water Consumption**

<b>Land Use</b>	<b>Size</b>	<b>Consumption Rate<sup>a</sup></b>	<b>Consumption (gpd)</b>
Commercial	12,335 sf	96 gallons/1,000 sf/day	1,184
Parking	20,595 sf	24 gallons/1,000 sf/day	494
<b>Total</b>			<b>1,678</b>
<i>sf = square feet                      gpd = gallons per day</i> <sup>a</sup> <i>City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.</i>			

Table IV.L-9 shows MWD's projected supply and demand under normal, dry and multiple-dry years. DWP has provided significant input to MWD in developing this analysis, which includes the City's projected water requirements from MWD. In fact, MWD's projections are 6 to 16 percent higher than member agencies projections. This difference indicates that MWD's supplies provide a level of margin of safety or flexibility to accommodate potential delays to planned projects. Based on MWD's current long-term water resources outlook, DWP does not anticipate the need to formally invoke preferential rights over the next 20 years.

<sup>22</sup> Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water and Power, December 2, 2010.

<sup>23</sup> Water consumption is based on land use categories and assumed consumption rates.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the project would:

- a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- b) Result in insufficient water supplies to serve the project from existing entitlements and resources, or require new or expanded entitlements.

#### *L.A. CEQA Thresholds Guide*

The *L.A. CEQA Thresholds Guide* states that the determination of significance for a project relative to water impact shall be made on a case-by-case basis, considering the following factors:

1. The total estimated water demand for the project;
2. Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
3. 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
4. The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

### Project Impacts

#### *Water Treatment*

As shown on Table IV.L-12, the proposed Project would result in a net water consumption of approximately 29,743 gallons of water per day. As discussed previously, the LAAFP has a design capacity of 600 MGD and has average flows of approximately 450 MGD in non-summer months and 550 MGD during summer months. Thus, the LAAFP has a remaining capacity range of 150 MGD to 50 MGD. As such, the Project's need for water treatment could be accommodated by the existing capacity at the LAAFP. Therefore, Project impacts related to water treatment would be less than significant.

## Water Supply

Based on the requirements of SB 610, preparation of a water supply assessment is not required for the proposed Project. DWP addresses issues of water supply in its UWMP, which considers growth that is projected in regional planning documents, such as SCAG's Blueprint Report; estimates the projected future water demand associated with this growth; and identifies water sources and ways to meet the demand during various hydrological conditions over the next 25 years. According to the UWMP, DWP has analyzed three different hydrological conditions to determine the reliability of water supplies for the City of Los Angeles: average, single dry year, and multi-year drought. In each of the three hydrological conditions, the projected water demand was calculated taking into account growth in billing data, water conservation efforts, and demographics. The UWMP states that DWP can reliably meet the projected water demand in each of the hydrological conditions over the next 25 years with its supply portfolio.

As shown on Table IV.L-12, the Project's estimated net water consumption would be 29,743 gallons per day. As discussed in Section IV.H, Population and Housing, the number of housing units and amount of residential population associated with the Project is consistent with the City's housing and population projections. The Project's residential population and residential units represent approximately 25 and 66 percent (respectively) of the projected growth for the *South Central Los Angeles Community Plan* area.

Thus, the Project's demand for water has already been considered in the UWMP, which demonstrates that water demands for DWP can be met. As such, the Project would not create a need for new expanded water supply sources. Therefore, Project impacts related to water supply would be less than significant.

**Table IV.L-12**  
**Estimated Project Water Consumption**

Land Use	Size	Consumption Rate <sup>a</sup>	Total Consumption (gpd)
4 Bedroom Townhome	8 du	336 gallons/du/day	2,688
1 Bedroom Condo	32 du	144 gallons/du/day	4,608
2 Bedroom Condo	76 du	192 gallons/du/day	14,592
3 Bedroom Condo	24 du	240 gallons/du/day	5,760
4 Bedroom Condo	2 du	288 gallons/du/day	576
Parking	133,193 sf	24 gallons/1,000 sf/day	3,197
<b>Project Total</b>			<b>31,421</b>
<b>Less Existing</b>			<b>1,678</b>
<b>Net Total</b>			<b>29,743</b>
<i>du=dwelling unit      sf=square feet      gpd = gallons per day</i> <sup>a</sup> <i>City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.</i>			

Due to statewide drought conditions in the mid-1970s and late 1980s, there is a need for water conservation in periods of water shortage. More recently, from 2007 through 2009, the LADPW has indicated a water supply shortage with severe water restrictions that went into effect June 1. The LADWP

recommends that water should be conserved at all times, because efficient use of water allows increased water for use in dry years and makes water available for beneficial environmental uses. As such, the Project would install low-flush showerheads, toilets, and urinals. Additionally, sprinkler use is restricted to Monday and Thursday.

There are no known problems or deficiencies in the project area and no Elevation Agreement recorded for the property. The LADWP's water system would be able to accommodate the Project within the existing capacity of the LAAFP, MWD supply, and groundwater well supply.<sup>24</sup>

The LADWP has stated that water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in water demand and that sufficient supplies are available to accommodate the Project. As shown in Section IV.H, Population and Housing, the Project's residential population and residential units represent approximately 25 and 66 percent (respectively) of the projected growth for the *South Central Los Angeles Community Plan* area. Further, the LADWP has indicated in its 2010 Urban Water Management Plan that it is in the process to secure a sustainable water supply for Los Angeles in the next 25 years.<sup>25</sup> Therefore, impacts to water supply would be less than significant.

## CUMULATIVE IMPACTS

Implementation of the proposed Project in conjunction with regional growth result in a net increase for the water supply and wastewater treatment in the City. As shown in Table IV.L-13, the proposed Project, in conjunction with related projects identified in this EIR (see Table II-1) would result in net cumulative increases in water consumption of 5.1 MGD.

MWD has supply capabilities that would be sufficient to meet expected demands from 2015 through 2035 under the single dry-year and multiple dry-year conditions. Even during shortages, MWD expects that it will be able to meet its member agencies' long-term needs through a combination of actions, including water-transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination. Additionally, MWD has more than approximately 3.8 million AF of storage capacity available in reservoirs and banking/transfer programs.

DWP has outlined aggressive short-term water conservation strategies in its Water Supply Action Plan that will be implemented and enforced to ensure a sufficient and reliable water supply in the event of a water supply shortage. These strategies include, but are not limited to: 1) more rigorous enforcement of existing prohibited uses of water, as well as new and expanded prohibited uses; 2) additional restrictions on landscape watering and washing/rinsing of vehicles, and increased monetary penalties for violations; 3) expansion of the agency's rebate and incentive program to further encourage water conservation

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<sup>24</sup> Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water and Power, December 2, 2010.

<sup>25</sup> Los Angeles Department of Water and Power, *Urban Water Management Plan*, 2010, page 25.



efforts; and 4) increased rates to encourage water conservation and curb usage. In the unlikely event that an unexpected water supply shortage was to occur, DWP would intensify, accelerate, and expand on these short-term conservation strategies to continue to ensure a sufficient and reliable water supply.

**Table IV.L-13**  
**Cumulative Water Consumption**

<b>Land Use</b>	<b>Size</b>	<b>Consumption Rate<sup>a</sup> (gallons per day)</b>	<b>Consumption (gallons per day)</b>
Multi-Family Residential	18,264 du	192/du	3,506,688
Office	2,799,325 sf	180/1,000 sf	503,878
Retail	945,669 sf	96/1,000 sf	90,784
Restaurant	130,227 sf	360/1,000 sf	46,881
Cinema	43,000 sf	96/1,000 sf	4,128
Hotel	1,390 rooms	156/room	216,840
Health Club	131,130 sf	960/1,000 sf	125,884
Educational	2,816,700 sf	180/1,000 sf	507,006
Stadium	360,000 sf	180/1,000 sf	64,800
Museum	77,100 sf	96/1,000 sf	7,401
<i>Related Projects Total</i>			<i>5,074,290</i>
<b>Total Proposed Project</b>			<b>29,743</b>
<b>Total Cumulative</b>			<b>5,104,033</b>
<i>du = dwelling unit      sf = square feet</i> <sup>a</sup> <i>Water assumed to be 120 percent of wastewater rates. City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit M.2-12, Sewage Generation Factors</i>			

As discussed previously, the Project's water demand is consistent with the future demand assumptions made in the UWMP and could be accommodated by DWP's existing entitlements. Thus, the project's contribution to the cumulative demand for water supply would not be considerable. Additionally, the 50 MGD to 150 MGD remaining treatment capacity would be adequate to accommodate cumulative water treatment needs. Further, preparation of water supply assessments would be required for those projects that meet the requirements of SB 610. Therefore, cumulative water service impacts would be less than significant.

## **MITIGATION MEASURES**

No significant water service impacts were identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- L-1: The landscaped irrigation system shall be designed, installed, and tested to provide uniform irrigation coverage for each zone. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets. Each zone (sprinkler valve) shall water plants having similar watering needs (do not mix shrubs, flowers, and turf in the same watering zone).

Automatic irrigation timers shall be set to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times shall be adjusted for all zones

seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.

The irrigation systems shall also meet the following requirements:

- Weather-based irrigation controller with rain shutoff;
- Flow sensor and master valve shutoff (large landscapes);
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; and
- Use of landscaping contouring to minimize precipitation runoff.

L-2: Drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1988, "The Unthirsty 100," pp. 74-83, or consult a landscape architect.

L-3: The Project Applicant shall use recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary).

L-4: The Project Applicant shall install ultra-low-flush high-efficiency toilets (1.28 gallons/flush or less, includes dual flush), ultra-low-flush high-efficiency urinals (0.5 gallons/flush or less, includes waterless), and water-saving showerheads (2.0 gallons/minute or less). Low flow faucet aerators shall be installed on all sink faucets with a faucet flow rate of 1.5 gallons/minute or less.

L-5: Significant opportunities for water savings exist in air conditioning systems that utilize evaporative cooling (i.e., employ cooling towers). Cooling towers shall be operated at a minimum of 5.5 cycles of concentration.

L-6: The Project Applicant shall install domestic water heating systems located in close proximity to point(s) of use. Tank-less and on-demand water heaters shall be used as feasible.

L-7: The Project Applicant shall install high-efficiency clothes washers (water factor of 6.0 or less) where clothes washers are provided, and high-efficiency dishwashers (Energy Star rated) shall be installed where dishwashers are provided. Water conserving clothes washers and dishwashers are now available from many manufacturers. Water savings also represent energy savings, in that the water saved by these appliances is typically heated.

L-8: Single-pass cooling shall be prohibited.

L-9: The Project Applicant shall install metering systems as follows:

- All dwelling units shall have individual metering and billing for water use; and
- All irrigated landscapes of 5,000 square feet or more require separate metering or submetering.

#### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts to water service would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### L. UTILITIES

#### 3. SOLID WASTE

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##### ENVIRONMENTAL SETTING

###### **Regulatory Framework**

Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The Los Angeles City Department of Public Works Bureau of Sanitation has the responsibility to develop plans and strategies to manage and coordinate the solid waste generation in the City of Los Angeles and to address the disposal needs of the City of Los Angeles as a whole. The Bureau of Sanitation also collects solid waste generated primarily by single-family dwellings, most small, multi-family dwellings usually consisting of four units or fewer, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial and industrial properties. Solid waste management includes solid waste source reduction, recycling, composting, transformation and disposal.

###### ***State Regulations***

###### *The California Integrated Waste Management Act of 1989 (AB 939)*

The management of non-hazardous waste in the City is guided by policies at the state and local levels. Acknowledging the need to develop a comprehensive integrated solid waste management policy throughout the state in the face of growing solid waste disposal needs and reduced landfill capacity, the State of California Legislature enacted the California Integrated Waste Management Act (also known as Assembly Bill 939 or AB 939) in September 1989. To address landfill capacity problems throughout the state, the California Integrated Waste Management Act and its modification, AB 2492, require that all jurisdictions, cities, and counties divert 25 percent of the total waste stream from landfill disposal by January 1, 1995 and 50 percent by January 1, 2000. The City of Los Angeles met and exceeded these requirements with a 60 percent diversion rate in the year 2000. This rate of diversion increased to 62 percent in 2001 and 2002.

AB 939 also requires that adequate long-term disposal capacity be identified and secured. In addition, state law requires that each city in the state prepare and adopt a Solid Waste Generation Study (SWGS) and a Source Reduction and Recycling Element (SRRE). The main purpose of the SRRE is to describe in detail how each city will meet the state-mandated diversion requirements. The SRRE for each locality then becomes the basis for each county's Integrated Solid Waste Management Plan.

## ***Regional Plans***

### ***Los Angeles County Integrated Waste Management Plan***

The County of Los Angeles, Department of Public Works prepared a Countywide Integrated Waste Management Plan (CIWMP) in August 2012.<sup>26</sup> The CIWMP shows the disposal trend during the economic recession has continued to be downward due to lack of consumer demand for materials, slowdown in construction industry and production and manufacturing of goods.

The CIWMP looked at Countywide strategies for maintaining adequate disposal capacity through 2026. These include permitting and developing proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity, developing necessary infrastructure to export waste out of the County, and developing conversion and other alternative technologies. In addition to continuing to enhance diversion programs and rates, Los Angeles County continues to support alternatives to landfills, such as conversion technologies. These processes are capable of processing materials that cannot be recycled into renewable energy, biofuels, and other useful products.

### ***City of Los Angeles Plans and Regulations***

#### ***City of Los Angeles Solid Waste Management Policy Plan***

The City of Los Angeles first prepared a Solid Waste Management Plan (CiSWMPP), which was adopted in November 1994 by the City Council. The CiSWMPP was a long-range solid waste management policy plan for the City, containing goals, objectives, and policies for solid waste management, while the SRRE is the strategic action plan for diverting solid waste from landfills.

The CiSWMPP also specified citywide diversion goals and disposal capacity needs. The objective of the CiSWMPP was a 50 percent reduction in waste generation either through source reduction or recycling by the year 2000 or as soon as possible thereafter, and consisted of implementing a residential curbside program and a commercial technical assistance program.

The CiSWMPP designated the remaining waste to be disposed in local and possible remote landfills. The CiSWMPP also established a Citywide diversion objective of 70 percent by 2020. The City achieved a 60 percent diversion rate in the year 2000 that increased to 62 percent in 2001 and 2002. Currently, the City has a goal of achieving a 70 percent reduction by the year 2015 (although an even more ambitious goal of 75 percent diversion by 2013 also has been mentioned in certain documents).

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<sup>26</sup> Solid Waste Information Management System: <http://dpw.lacounty.gov/epd/swims/>, accessed September 11, 2012

*RENEW LA Plan*

A resource management blueprint called RENEW LA (Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles) was adopted by the City Council in February 2006.<sup>27</sup> This 20-year plan is the blueprint that will guide the City in reducing the use of landfills by maximizing recycling and reuse, and converting much of the solid waste that currently would go to landfills into clean energy and/or valuable raw materials. Many of the plan components have been, and continue to be implemented. RENEW LA calls for the following actions:

- Establish RENEW LA Oversight Committee
- Adopt RENEW LA Blueprint and Zero Waste Policy
- Modify Zoning Code to allow Alternative Technology by right in M2 (light industrial) and M3 (heavy industrial) zones with conditions
- Establish site areas for Alternative Technology in each of the Collection Districts
- Site and develop the first and second Alternative Technology facility
- Establish a fund from Sunshine Canyon host fees for development of facilities that reduce land-filling
- Implement recycling in 50% of the commercial sector
- Mandate a time-certain reduction in City MSW disposed at Sunshine Canyon
- Expand Multi-Family Recycling to 50% of the City
- Establish City tax breaks for Zero Waste and new re-manufacturing companies
- Establish a green energy producer bonus from the Department of Water and Power
- Add residential food waste to the green bin program

*Solid Waste Integrated Resources Plan (Zero Waste Plan)*

The Solid Waste Integrated Resources Plan (SWIRP, or Zero Waste Plan) will become the City's 20-year master plan to achieve zero waste in Los Angeles. SWIRP is designed to be a six-year stakeholder-driven planning effort, organized by regions of the city that make up the city's six collection districts.

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<sup>27</sup> Fact Sheet: City's Solid Waste Policies and Programs, website: [http://www.lacitysan.org/srssi/swirp/files/info/fact\\_sheet/SWIRPPolicyNprogramsFactSheet\\_032009.pdf](http://www.lacitysan.org/srssi/swirp/files/info/fact_sheet/SWIRPPolicyNprogramsFactSheet_032009.pdf), accessed September 11, 2012.

Mayor Antonio Villaraigosa and the Los Angeles City Council have established several key goals in response to the growing challenges posed by global climate change:<sup>28</sup>

- Implement a stakeholder-driven Solid Waste Integrated Resources Plan (SWIRP).
- Achieve 75% diversion (recycling rate) by 2013.
- Operate an alternative technology facility by 2010.
- Convert the Bureau of Sanitation's fleet of trucks (750) to run on clean fuels by 2010.
- Reduce green house gas emission to 35% below 1990 levels by 2030.
- RENEW LA, which includes a 12-step action plan that puts the City on the Path toward becoming zero waste.

The Zero Waste Plan is currently preparing a Final Environmental Impact Report with responses to public comments and expects a project approval hearing in fall 2012.<sup>29</sup>

#### *City of Los Angeles General Plan*

The General Plan is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. The General Plan Element that discusses solid waste is found in Chapter 9 (Infrastructure and Public Services).<sup>30</sup> However, this section is approximately 20 years old and mentions future plans and projections that have already occurred. The discussion provides no current goals or guidelines. The other City plans and regulations described above are more current and relevant to the existing and future solid waste environment.

#### *Ordinance No. 171687*

Los Angeles City Ordinance 171687, enacted in 1997, mandates that new construction in the City provide certain minimum space for recycling containers.

#### *Ordinance 181519*

On March 5, 2010, the City Council approved the Citywide Construction and Demolition (C&D) Waste Recycling Ordinance (Ordinance 181519) that requires ALL mixed C&D waste generated

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<sup>28</sup> Zero Waste Plan Fact Sheet: [http://www.zerowaste.lacity.org/files/info/fact\\_sheet/2009Feb2SWIRPFactSheet.pdf](http://www.zerowaste.lacity.org/files/info/fact_sheet/2009Feb2SWIRPFactSheet.pdf), accessed September 11, 2012.

<sup>29</sup> Zero Waste Plan: <http://www.zerowaste.lacity.org/home/index.html>, accessed September 11, 2012.

<sup>30</sup> <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm#solidwaste>

within City limits be taken to City certified C&D waste processors. The Bureau of Sanitation (BOS) is responsible for this new C&D waste recycling policy that is effective January 1, 2011.

All haulers and contractors responsible for handling C&D waste must obtain a Private Solid Waste Hauler Permit from BOS prior to collecting, hauling and transporting C&D waste and C&D waste can only be taken to City Certified C&D Processing Facilities. Effective January 1, 2011, non-compliance penalties of up to \$5,000 will be assessed for every load of C&D waste not taken to City certified processors. Among the various purposes of this program is the goal of maintaining an open and competitive market for all companies providing solid waste and disposal services in the City, and to mandate the recycling of construction and demolition waste.<sup>31</sup>

#### *Ordinance 181227*

On July 7, 2010, the City Council approved the Citywide Recycling Chute Ordinance (Ordinance 181227) that requires all new development projects, all existing multiple-family residential development projects of four or more units where the addition of floor area is 25 percent or more, and all other existing development projects where the addition of floor area is 30 percent or more, to provide an adequate recycling area or room for the collection and loading of recyclable materials. When a new development project provides a trash chute or an existing development project adds a trash chute, a recycling chute shall also be provided in both cases. Recycling chutes shall be clearly marked "recycling only" at every point of entry.

#### *Multi-Family Recycling*

Although there are no current policies that require recycling and green waste services at multi-family complexes, the Bureau does offer the opportunity to participate in the Multifamily Residential Recycling Program. This Program offers free recycling services to complexes of five or more units that are currently receiving private trash service, and accepts the same materials that are accepted in the Bureau's curbside recycling program for single-family residences.

### **Existing Conditions**

#### ***Regional***

##### *Landfills*

Waste disposal sites, or landfills, are operated by both the City and the County of Los Angeles (County), as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger hauling trucks are available to transport the materials directly to the landfills. Landfill availability

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<sup>31</sup> Bureau of Sanitation Construction and Demolition Recycling:  
[http://www.lacitysan.org/solid\\_resources/recycling/c&d.htm](http://www.lacitysan.org/solid_resources/recycling/c&d.htm)



is limited by several factors, including: 1) restrictions to accepting waste generated only within a landfills' particular jurisdiction and/or wasteshed boundary; 2) tonnage permit limitations; 3) types of waste; and 4) operational constraints.

Landfills serving the City include Sunshine Canyon Landfill and Chiquita Canyon Landfill. However, over 90 percent of the solid waste generated in the City is disposed at the Sunshine Canyon Landfill in Sun Valley. All landfills accept residential, commercial, and construction waste. Other solid waste facilities in Los Angeles County near the Project site include Angeles Western Transfer Station, Central LA Recycling and Transfer, and Waste Transfer.<sup>32</sup>

The Sunshine Canyon Landfill is jointly operated by the City and the County (each operates separate portions of the landfill). The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and currently accepts an average of 7,801 tpd and, therefore, has a remaining daily intake availability of 4,299 tpd (refer to Table IV.L-14).<sup>33</sup>

The Chiquita Canyon Landfill was expanded in 2005 and currently has a permitted intake of 6,000 tpd and currently accepts an average of 4,264 tpd, with a remaining daily intake availability of 1,736 tpd.

Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill have a combined remaining permitted daily intake 6,035 tpd. The Sunshine Canyon Landfill has an estimated remaining life of 25 years (based on land use permit restrictions), and the Chiquita Canyon Landfill has an estimated remaining life of 4 years (based on 4,264 tpd, 312 days per year).

According to the Los Angeles County Department of Public Works' 2008 Annual Report on the Countywide Integrated Waste Management Plan (CIWMP), the County is currently conducting a five-year review of the CIWMP.<sup>34</sup> The County's strategy for maintaining adequate disposal capacity through 2023 includes the use of green waste as Alternative Daily Cover expansion of existing landfill capacity, conversion and other alternative technology efforts, and efforts in waste reduction.<sup>35</sup>

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<sup>32</sup> Solid Waste Facilities in Los Angeles County website: <http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3727>, accessed November 8, 2010.

<sup>33</sup> See County of Los Angeles Department of Public Works, 2008 Annual Report, October 2009), website: <http://dpw.lacounty.gov/swims/Upload/2008%20AR%20FINAL.pdf>, accessed November 8, 2010.

<sup>34</sup> See *id.* at pages 10-17.

<sup>35</sup> Alternative Daily Cover (ADC) refers to materials such as processed green waste, auto shredder fluff, and tarps. Landfill operators are required to cover the active face of the landfill at the end of every day to prevent odors and risks to public health. The traditional material used for this purpose is soil. Operators have found that ADC can be used for the same purpose.

**Table IV.L-14  
Landfill Capacity and Intake**

<b>Landfill Facility</b>	<b>Remaining Life (years)</b>	<b>Permitted Intake (tons/day)</b>	<b>Average Intake (tons/day)</b>	<b>Available Intake (tons/day)</b>
Sunshine Canyon	25	12,100	7,801	4,299
Chiquita Canyon	4	6,000	4,264	1,736
<b>Total Remaining Intake</b>				<b>6,035</b>
County of Los Angeles Department of Public Works, 2011 Annual Report, August 2012), website: Solid Waste Information Management System: <a href="http://dpw.lacounty.gov/epd/swims/">http://dpw.lacounty.gov/epd/swims/</a> , accessed September 11, 2012				

### **Local**

The City of Los Angeles Bureau of Sanitation provides for multifamily curbside recycling and household hazardous waste programs. Residential curbside recycling allows for paper, cartons, metals, glass, and plastics.<sup>36</sup> Hazardous materials that are corrosive, toxic, ignitable, flammable, or reactive are collected at SAFE Centers throughout the City.<sup>37</sup> The current City-owned landfills are non-operational and in the process of being closed or already closed.<sup>38</sup> Construction and demolition processing are allowed at the following local sites:<sup>39</sup>

- Construction and Demolition Recycling, located at 9309 Rayo Avenue, South Gate, has a permitted capacity of 3,000 tpd. Current average daily intake is not known at this time;
- Direct Disposal C & D Recycling, located at 3720 Noaks Street, Los Angeles, has a permitted capacity of 100 tpd and receives an average of 37 tpd;
- Looney Bins/East Valley Diversion, located at 11616 Sheldon Street, Sun Valley, has a permitted capacity of 750 tpd and receives an average of 261 tpd; and
- Looney Bins/Downtown Diversion, located at 2424 Olympic Boulevard, Los Angeles, has a permitted capacity of 1,500 tpd and receives an average of 396 tpd.

<sup>36</sup> Curbside Recycling Program:  
[http://www.lacitysan.org/solid\\_resources/recycling/curbside/Curbside\\_Recycling.htm](http://www.lacitysan.org/solid_resources/recycling/curbside/Curbside_Recycling.htm)

<sup>37</sup> Special Materials, Hazardous Waste: [http://www.lacitysan.org/solid\\_resources/special/index.htm](http://www.lacitysan.org/solid_resources/special/index.htm)

<sup>38</sup> Solid Resource, Procession and Construction Division: <http://www.lacitysan.org/srpcd/landfills.htm>

<sup>39</sup> County of Los Angeles Department of Public Works, 2011 Annual Report, August 2012), website: Solid Waste Information Management System: <http://dpw.lacounty.gov/epd/swims/>, accessed September 11, 2012

## Project Site

### Existing Solid Waste Generation

As shown on Table IV.L-15, existing uses at the Project site generate approximately 0.19 tons of solid waste per day.<sup>40</sup>

**Table IV.J-15  
Existing Solid Waste Generation**

Land Use	Size	Generation Rate (tpd)	Generation (tpd)
Commercial	12,335 sf	0.0000156/sf <sup>a</sup>	0.19
Parking <sup>b</sup>	20,595 sf	-	-
<b>Total Existing Generation</b>			<b>0.19</b>
<i>tpd = tons per day                      sf = square feet</i> <sup>a</sup> CalRecycle, Estimated Solid Waste Generation Rates, website: <a href="http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/Service.htm">http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/Service.htm</a> , September 11, 2011 <sup>b</sup> Solid waste generation associated with the parking lot is minimal.			

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### CEQA Guidelines

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the project would result in the following:

- a) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

#### L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* states that a determination of significance relative to solid waste and infrastructure shall be made on a case-by-case basis, considering the following factors:

1. 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;
2. Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and

<sup>40</sup> Solid waste generation is based on land use categories and assumed generation rates.

3. Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

## Project Impacts

### Construction

The Project includes removal of existing uses from the Project site and development of the site with residential land uses. The primary types of demolition and construction debris that would be removed from the site would include cement, scrap lumber, metal, masonry materials, and soil/dirt. As shown on Table IV.L-16, the Project's demolition and construction phase would generate approximately 1,355 tons of debris over the entire period. The demolition and construction debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with Ordinance 181519 at one of the City certified C&D waste processor facilities. The estimated amount of construction waste could be accommodated by these facilities. Further, the soil/dirt exported from the Project site would be used for landfill cover requirements at one of the local landfills. Therefore, the Project's construction related impacts to solid waste would be less than significant.

**Table IV.L-16**  
**Approximate Project Demolition and Construction Waste Generation**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (tons)
<b>Demolition <sup>b</sup></b>			
Non-residential	12,335 sf	155 lbs/sf	955
<b>Construction</b>			
Residential	192,140 sf	4.38 lbs/sf	400
<b>Total Generation</b>			<b>1,355</b>
<i>lbs = pounds                      sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.</i> <sup>b</sup> Demolition is estimated to last 1 month (estimated 20 working days per month)			

### Operation

As shown on Table IV.L-17, the Project would generate a net increase of 0.09 tons of solid waste per day, not accounting for the effectiveness of recycling efforts. The remaining daily intake of the Sunshine Canyon Landfill is 4,299 tpd and has an expected remaining life of 25 years (estimated in the CIWMP 2011 Report, based on land use permit restrictions). The Project is expected to be built-out in the next two years, and the Landfill will continue to have capacity and remaining life to accommodate the Project for at least 2 decades of operation. Further, as described in the CIWMP, the County has identified various countywide and jurisdiction-level waste reduction and diversion strategies in order to maintain adequate disposal capacity through 2026.

Consistent with City recycling requirements, the Project Applicant would provide recycling facilities and clearly marked, durable, source sorted recycling bins throughout the Project site to facilitate recycling in accordance with Ordinances 171687 and 181227. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. For these reasons, Project impacts related to solid waste service would be less than significant.

**Table IV.L-17**  
**Estimated Project Solid Waste Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup></b>	<b>Total Generation (tpd)</b>
Residential	142 du	0.002 tpd/du	0.28
Parking <sup>b</sup>	133,193 sf	--	--
<b>Project Total</b>			<b>0.28</b>
<b>Less Existing</b>			<b>0.19</b>
<b>Net Total</b>			<b>0.09</b>
<i>du=dwelling unit    sf=square feet    lbs=pounds    tpd= tons per day</i> <sup>a</sup> Source: CalRecycle website: <a href="http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm">http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm</a> , June 2013 <sup>b</sup> No generation rate given, however solid waste generation is expected to be minimal. Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.			

## CUMULATIVE IMPACTS

### Construction

The Project, in conjunction with related projects identified in this EIR and other expected growth within the region, would generate an increase in construction-related (i.e., inert) waste during the temporary construction period for each project. Similar to the proposed Project, any soil excavated from the sites of the related project would be disposed of at local landfills and would be used to accommodate requirements for landfill cover. Because the exact construction schedules for each of the related projects is unknown, it is not possible to determine how much of the cumulative construction debris would be disposed of on a daily basis. Per Ordinance 181519, all related projects must use a City-certified waste processor for demolition and construction waste.

Each of the related projects would be subject to environmental review where a more detailed study of the estimated construction waste would occur and identify nearby recycling facilities and determine capacity. Therefore, cumulative impacts related to disposal of demolition and construction debris would be less than significant.

### Operation

The estimated cumulative solid waste generation associated with the proposed Project and the related projects is shown on Table IV.L-18. This cumulative solid waste generation does not take into

consideration removal of existing land uses, which are likely generating solid waste, or the effectiveness of the City's recycling programs, such as the City's efforts to achieve a "zero waste" level (a 90 percent diversion rate) by the year 2025 that would substantially reduce the demand for landfill capacity.

**Table IV.L-18**  
**Cumulative Solid Waste Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup> (pounds per day)</b>	<b>Generation (pounds per day)</b>
Multi-Family Residential	18,264 du	12.23/du	223,368
Office	2,799,325 sf	6/1,000 sf	16,795
Retail	945,669 sf	5/1,000 sf	4,728
Restaurant	130,227 sf	5/1,000 sf	651
Cinema	43,000 sf	5/1,000 sf	215
Hotel	1,390 rooms	4/room	5,560
Health Club	131,130 sf	5/1,000 sf	655
Educational	2,816,700 sf	5/1,000 sf	14,083
Stadium	360,000 sf	5/1,000 sf	1,800
Museum	77,100 sf	5/1,000 sf	385
<i>Related Projects Total</i>			<i>268,240 (or 134 tpd)</i>
<b>Total Proposed Project</b>			<b>0.09 tpd</b>
<b>Total Cumulative</b>			<b>134.09 tpd</b>
<i>du = dwelling unit      sf = square feet      tpd = tons per day</i> <sup>a</sup> California Integrated Waste Management Board website: <a href="http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm">http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm</a> , July 10, 2009			

The Sunshine Canyon Landfill has an available daily intake of 4,299 tons of solid waste per day and has a remaining lifespan of 25 years. Assuming that all of the cumulative solid waste is sent to the Sunshine Canyon Landfill with no waste stream diversion, the additional 135.09 tons per day would not cause the Sunshine Canyon Landfill to exceed its permitted daily capacity. As previously discussed, additional capacity to accommodate the cumulative disposal needs of the proposed project and related projects may become available as the City develops solutions to meet future disposal needs at a regional level (e.g., expanding existing landfills, transporting waste to other landfills, converting waste to energy, recycling, and waste reduction).

As with the proposed Project, other future development projects would be required to facilitate recycling programs, utilization of which could effectively reduce the amount of solid waste to be disposed of at the landfills described above. Because landfill capacities would be sufficient to accommodate the solid waste generation by cumulative growth, cumulative impacts related to solid waste service would be less than significant.

## **MITIGATION MEASURES**

No significant impacts related to solid waste service have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measure:

- L-10: During the Project's construction phase, the applicant shall label recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation shall be used. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.
- L-11: During the Project's operational phase, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable materials during operation of the Project. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.

#### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to solid waste would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### L. UTILITIES

#### 4. ENERGY

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#### ENVIRONMENTAL SETTING

##### Regulatory Setting

##### *Federal Energy Regulatory Commission (FERC)*

The Federal Energy Regulatory Commission (FERC) is an independent federal agency that regulates the interstate transmission of natural gas, oil, and electricity. Among its responsibilities, FERC:

- Regulates the transmission and wholesale sales of electricity in interstate commerce;
- Regulates the transmission and sale of natural gas for resale in interstate commerce;
- Regulates the transportation of oil by pipeline in interstate commerce;
- Approves the siting and abandonment of interstate natural gas pipelines and storage facilities;
- Reviews the siting application for electric transmission projects under limited circumstances;
- Licenses and inspects private, municipal, and state hydroelectric projects;
- Protects the reliability of the high voltage interstate transmission system through mandatory reliability standards;
- Monitors and investigates energy markets; and
- Oversees environmental matters related to natural gas and hydroelectricity projects and other matters.

##### *Electricity*

##### *Title 24 of the California Code of Regulations*

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (Title 24). These standards relate to insulation requirements, glazing, lighting, shading, and water and space heating systems. The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. They are enforced through the local building permit process. Local government agencies may adopt and enforce



additional energy standards for new buildings, provided these standards meet or exceed those provided in Title 24 guidelines.

*The California Air Resources Board (CARB)*

The California Air Resources Board (CARB) approved regulations, which will subject all utilities to a new Renewable Energy Standard (RES) of 33 percent by 2020, including the following interim targets:

- Maintain at least 20 percent renewables between 2012 and 2014
- Maintain 24 percent renewables between 2014 and 2017
- Maintain 28 percent renewables between 2018 and 2019
- Achieve 33 percent renewables by 2020 and maintain this level thereafter.

The regulations were adopted by the Air Resources Board in September 2010 and will go into effect in early 2011. The regulations provide the full authority of CARB to issue significant penalties for failure to achieve the targets. To meet these requirements, the Los Angeles Department of Water and Power (LADWP) Board of Commissioners has adopted a policy to achieve 20 percent renewables by 2010, and 35 percent by 2020. The Board and City Council have approved projects and long-term power purchase agreements to achieve the 20 percent RPS goal by the end of 2010.

*Western Electricity Coordinating Council*

The Western Electricity Coordinating Council (WECC) is a voluntary consortium of electrical power providers that is responsible for coordinating and promoting electricity reliability from Alberta and British Columbia in the north of its jurisdiction to northern Baja California in the south of its jurisdiction and the 14 western states in between. DWP is a member of the WECC. WECC has implemented Standard BAL-STD-002-0 to require reliable operation of the interconnected power system while ensuring adequate generating capacity be available at all times to account for varying demands and avoid loss of firm load following transmission or generation contingencies. As a means of ensuring power system reliability, DWP maintains an extra reserve margin of power generation resources in the event of a power system disturbance. In order to determine how much extra generation reserves are needed, DWP adheres to the WECC Reliability Standard. Specifically, WECC Standard BAL-STD-002-0 requires its providers to:

- Supply requirements for load variations;
- Replace generating capacity and energy lost due to forced outages of generation or transmission equipment;
- Meet on-demand obligations; and
- Replace energy lost due to curtailment of interruptible imports.

*2010 Power Integrated Resource Plan (2010 IRP)*

The 2010 Power Integrated Resources Plan (IRP) provides a 20-year framework to ensure LADWP will meet the future energy needs of its ratepayers. Through an IRP, utilities forecast the demand for energy and determine how that demand will be met. This IRP is guided by the following key objectives:

- Maintain a high level of electric service reliability
- Maintain competitive rates
- Exercise environmental stewardship

The IRP is a high-level plan that establishes the overall strategic course of the Power System while providing the necessary flexibility to adjust to changes in the system by presenting several potential strategies for meeting LADWP's regulatory requirements and policy objectives for increasing renewable energy generation and reducing GHG emissions, maintaining electric power service reliability, and minimizing any financial impact on ratepayers. The plan calls for initiatives in energy efficiency (EE) as well as the implementation of demand-side resources (DSR) to help ensure the LADWP meets its environmental policy objectives and regulatory requirements.

This plan also strives to maintain a high level of electric service reliability. To ensure reliability, LADWP recommends replacing portions of its aging transmission and distribution infrastructure along with re-powering several units of its natural gas-fired generation fleet.

***Natural Gas****California Public Utilities Commission (PUC)*

The California Public Utilities Commission (PUC) regulates natural gas utility service for approximately 10.7 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The PUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering and billing.

Most of the natural gas used in California comes from out-of-state natural gas basins. In 2008, California customers received 46 percent of their natural gas supply from basins located in the Southwest, 19 percent from Canada, 22 percent from the Rocky Mountains, and 13 percent from basins located within California.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. Most of the natural gas transported via the interstate pipelines, as well as some of the California-produced natural gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" natural gas pipeline

system). Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or to natural gas storage fields. The PUC has regulatory jurisdiction over 100,000 miles of utility-owned natural gas pipelines, which transported 79 percent of the total amount of natural gas delivered to California's gas consumers in 2008.<sup>41</sup>

## Existing Conditions

### Electricity

Electricity service to the Project area is provided by DWP, the largest municipally owned utility in the nation. Electricity distribution lines that currently serve the Project site include an overhead 4.8-kilovolt line and 34.5-kilovolt line along Oak Street. Receiving Station B located at 9615 South Central Avenue supplies electricity to most of the area. LADWP routinely plans capacity additions and changes at existing and new facilities as needed to supply area load.<sup>42</sup> As shown on Table IV.L-19, existing uses at the Project site consume approximately 167,139 kilowatt (KW) hours per year.<sup>43</sup>

**Table IV.L-19**  
**Existing Electricity Consumption**

Land Use	Size	Consumption Rate (KW-hour/year) <sup>a</sup>	Consumption (KW-hour/year)
Commercial	12,335 sf	13.55/sf	167,139
Parking	20,595 sf	-	-
<b>Total Existing Consumption</b>			<b>167,139</b>
<i>KW-hour = kilowatt hour      sf = square feet</i>			
<sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

### Natural Gas

The Southern California Gas Company (SCG) provides natural gas service within the City's jurisdictional boundaries, including the Project area. SCG receives its supplies from production fields in the southwestern United States, the Rocky Mountain area, and western Canada.

Gas distribution infrastructure currently serving the Project site includes 4-inch and 16-inch lines in Washington Boulevard and a 2-inch line in Oak Street.<sup>44</sup> As shown on Table IV.L-20, existing uses at the Project site consume approximately 37,005 cubic feet of natural gas per month.<sup>45</sup>

<sup>41</sup> California Public Utilities Commission, "Natural Gas and California," last modified on 1/19/2010  
<http://www.cpuc.ca.gov/PUC/energy/Gas/natgasandCA.htm>

<sup>42</sup> Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water and Power, December 2, 2010.

<sup>43</sup> Electricity consumption based on land use categories and assumed consumption rates.

<sup>44</sup> Correspondence with Fidel Galvan, Region Associate Engineer, Southern California Gas, May 5, 2009.

<sup>45</sup> Natural gas consumption is based on land use categories and assumed consumption rates.

**Table IV.L-20**  
**Existing Natural Gas Consumption**

<b>Land Use</b>	<b>Size</b>	<b>Consumption Rate (CF/Month)<sup>a</sup></b>	<b>Consumption (CF/Month)</b>
Commercial	12,335 sf	3.0/sf	37,005
Parking	20,595 sf	-	-
<b>Total Existing Consumption</b>			<b>37,005</b>
<i>CF = cubic feet      sf = square feet</i>			
<sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.			

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *CEQA Guidelines*

Appendix F of the *CEQA Guidelines* “requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.”

#### *L.A. CEQA Thresholds Guide*

The *L.A. CEQA Thresholds Guide* states that a determination of significance relative to energy consumption shall be made on a case-by-case basis, considering the following factors:

1. The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
2. Whether and when the needed infrastructure was anticipated by adopted plans; and
3. The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

### Project Impacts

#### *Electricity*

As shown on Table IV.L-21, the proposed Project is estimated to result in a net consumption of 631,824 KW-hours per year. DWP could serve the Project’s demand for electricity through existing supplies in the area. During the Project’s construction phase, the Project Applicant would be required to consult with DWP regarding the specific requirements for connection and would be responsible for installation of any connection infrastructure. At a minimum, the proposed Project would incorporate energy conservation measures required by the City to meet minimum State energy conservation requirements, such as those established by Title 24. As such, the proposed Project would not require new (off-site) energy supply

facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities and would incorporate energy conservation measures that go beyond City requirements. Therefore, Project impacts related to electricity supply and infrastructure would be less than significant.

**Table IV.L-21**  
**Estimated Net Electricity Consumption of the Project**

Land Use	Size	Consumption Rate (KW-hour/year) <sup>1</sup>	Generation (KW-hour/year)
Residential	142 du	5,626.50/du	798,963
Parking	133,193 sf	-	-
<i>Less Existing Consumption</i>			<i>167,139</i>
<b>Total Net Consumption</b>			<b>631,824</b>
<i>du = dwelling unit                      sf = square feet</i> <sup>1</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

### **Natural Gas**

As shown on Table IV.L-22, the proposed Project is estimated to result in a net consumption of 247,847 cubic feet of natural gas per month. SCG could serve the Project's demand for natural gas through existing supplies.<sup>46</sup> During the Project's construction phase, the Project Applicant would be required to consult with SCG regarding the specific requirements for connection and would be responsible for installation of any connection infrastructure. As discussed previously, at a minimum, the proposed Project would incorporate energy conservation measures required by the City to meet minimum State energy conservation requirements, such as those established by Title 24. As such, the proposed Project would not require new (off-site) natural gas supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities and would incorporate energy conservation measures that go beyond City requirements. Therefore, Project impacts related to natural gas supply and infrastructure would be less than significant.

**Table IV.L-22**  
**Estimated Net Natural Gas Consumption of the Project**

Land Use	Size	Consumption Rate (CF/Month) <sup>1</sup>	Consumption (CF/Month)
Residential	142 du	4,012/du	284,852
Parking	133,193 sf	-	-
<i>Less Existing Consumption</i>			<i>37,005</i>
<b>Total Net Consumption</b>			<b>247,847</b>
<i>CF = cubic feet                      du = dwelling unit                      sf = square feet</i> <sup>1</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

<sup>46</sup> Correspondence with Fidel Galvan, Region Associate Engineer, Southern California Gas, May 5, 2009.

## **CUMULATIVE IMPACTS**

Development of the proposed Project in combination with the some of the related projects and projected population growth in the greater Los Angeles area not captured within the related projects could create an increased demand for electricity supplied by DWP and natural gas supplied by SCG. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of the related projects (and other development in the greater Los Angeles area) could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with implementation of some of the related projects and other development, the resulting demand for electricity and natural gas supplies could be the same or less than the existing condition. Nonetheless, both DWP and SCG undertake expansion or modification of energy service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing energy service. Any potential increased demand related to energy service would be addressed through this process, and cumulative energy impacts would be less than significant.

## **MITIGATION MEASURES**

No significant impacts related to energy have been identified, and no mitigation measures are required. However, the City requires implementation of the following Standard Mitigation Measures:

- L-12: Windows shall be designed to reduce thermal gain and loss and thus cooling loads during warm weather, and heating loads during cool weather (e.g., tinting, double pane glass, etc.).
- L-13: Thermal insulation that exceeds requirements established by the State of California Energy Conservation Standards shall be installed in walls and ceilings.
- L-14: High-efficiency lamps shall be installed for all outdoor security lighting.
- L-15: Time control interior and exterior lighting shall be installed. These systems shall be programmed to account for variations in seasonal daylight times.
- L-16: Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and thus increase lighting efficiency.
- L-17: If applicable, the Applicant shall coordinate with DWP and fund the installation of upgraded facilities as needed to maintain an adequate electricity distribution system and/or to connect the Project site to the surrounding infrastructure.

Additionally, DWP recommends the following measures to further reduce the Project's electricity consumption:

- L-18: Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.
- L-19: Install high-efficiency air conditioning controlled by a computerized energy-management system in the retail spaces that provides the following:
- A variable air-volume system that results in minimum energy consumption and avoids hot water energy consumption for terminal reheat;
  - A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
  - Sequentially staged operation of air-conditioning equipment in accordance with building demands; and
  - The isolation of air conditioning to any selected floor or floors.
- L-20: Consider the applicability of the use of thermal energy storage to handle cooling loads.
- L-21: Cascade ventilation air from high-priority areas before being exhausted, thereby decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted.
- L-22: Recycle lighting system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings via ceiling plenums to reduce cooling loads in warm weather.
- L-23: Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.
- L-24: Ensure that buildings are well sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.
- L-25: A performance check of the installed space-conditioning system should be completed by the developer/install prior to issuance of the Certificate of Occupancy to ensure that energy-efficiency measures incorporated into the proposed Project operate as designed.
- L-26: Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and thus, increase lighting efficiency.
- L-27: Use a white reflective material for roofing that meets California standards for reflectivity and emissivity to reject heat.

- L-28: Install thermal insulation in walls and ceilings that exceeds requirements established by the California Code of Regulations.
- L-29: Design window systems to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
- L-30: Install heat-rejecting window treatments, such as films, blinds, draperies, or others on appropriate exposures.
- L-31: Install whenever possible fluorescent and high-intensity-discharge (HID) lamps that give the highest light output per watt of electricity consumed, including all street and parking lighting to reduce electricity consumption. Use reflectors to direct maximum levels of light to work surfaces.
- L-32: Install photosensitive controls and dimmable electronic ballasts to maximize the use of natural daylight available and reduce artificial lighting load.
- L-33: Install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- L-34: Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- L-35: Control mechanical systems (heating, ventilation, and cooling and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- L-36: Incorporate windowless walls or passive solar inset of windows into the proposed Project for appropriate exposures.
- L-37: Design the proposed Project to focus pedestrian activity within sheltered outdoor areas.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Impacts related to energy would be less than significant.



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## V. GENERAL IMPACT CATEGORIES

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### A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(b) states the following:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.*

The proposed Project would result in the following significant and unavoidable impacts:

#### **Construction-Related Regional Air Quality**

The peak daily emissions generated during the Project's site preparation, grading, and excavation phase would exceed the regional emission threshold recommended by the SCAQMD for NO<sub>x</sub> largely due to off-road diesel-powered equipment and soil hauling. Therefore, regional air quality impacts associated with the Project-related construction emissions would be considered significant and unavoidable.

#### **Construction-Related Noise**

With compliance with Section 41.40 of the LAMC and the implementation of the Mitigation Measures H-1 through H-10, which would require the implementation of noise reduction devices and techniques during construction at the Project site, construction-related noise impacts associated with the Project would be reduced to the maximum extent feasible. Nevertheless, because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period and by more than 10 dBA for more than one day, construction noise impacts would be significant and unavoidable.

### B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECTS

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of the ways in which a project could be growth inducing. This includes ways in which the project would 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* reads as follows:

*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 would 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 Project includes removal of the existing catering building and parking lot, and development of the Project site with 142 dwelling units in two condominium buildings and four townhomes. As discussed in Section IV.I (Population and Housing), the construction jobs provided by development of the Project would be filled by the existing employee base available in the Project region and would not draw a new population to the area. Thus, Project construction jobs would not induce substantial growth.

Additionally, as discussed in Section IV.I, the Project's residential population and residential units would represent less than 1.0 percent of the of the projected growth that is anticipated to occur in the City between 2010 and 2015, 2015 and 2020, and 2010 and 2020. The Project's residential population and residential units represent approximately 25 and 66 percent (respectively) of the projected growth for the *South Los Angeles Community Plan* area. It is possible that some or all of the residential population associated with the Project could already reside in the City or in the *South Los Angeles Community Plan* area. In this case, the Project's residential population would not result in any net population growth for the City or Community Plan area. However, the Project's residential population and residential units would exceed the growth anticipated for Census Tract 1945.00. Nonetheless, because the amount of residential units and residential population fall within the growth projections for the City and Community Plan area, the Project would not generate substantial population growth. Additionally, as discussed in Section IV.F (Land Use and Planning), the Project would be substantially consistent with the applicable policies of the Framework Element and RCP and consistent with all applicable policies of the Housing Element. Therefore, Project impacts related to population, housing, and employment would be less than significant.

The Project site is located in an area that is currently developed with commercial land uses and is served by existing roadways, utility infrastructure, and service systems. As discussed in Section IV.L (Utilities), the Project's demand for wastewater/water treatment, water and wastewater service, landfill capacity, and energy could be accommodated by existing facilities and would not require new or expanded facilities. Thus, the proposed Project would not result in the removal of obstacles to population growth.

The Project site is located in a developed, urban area with existing public services (i.e., police, fire protection, schools, and parks and recreation). As discussed in Section IV.J (Public Services), the Project's need for fire, police, school, and recreational services could be accommodated by existing facilities, and no new or expanded governmental facilities would be needed. Additionally, the Project Applicant would be required to implement Mitigation Measure J-11 to ensure that Project impacts related to library services would be less than significant. Therefore, the proposed Project would not tax the existing community services facilities by requiring the construction of new public facilities that would cause significant environmental effects.

For all the reasons discussed above, the proposed Project would not be considered growth inducing and would not result in growth-inducing impacts.

### **C. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT**

Section 15126.2(c) of the *CEQA Guidelines* states that significant irreversible environmental changes associated with a project shall be discussed, including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The Project site is currently developed and is located in an urbanized area of the City. Implementation of the proposed Project would represent a continued long-term commitment to use of the site. As a result, the proposed Project would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. However, the proposed Project would not require a large commitment of any of these resources, and impacts related to this issue would be less than significant.

The proposed Project includes development of a residential development on a site that is already developed and in an urbanized area that is already served by an existing roadway system and utility infrastructure. Thus, implementation of the proposed Project would not commit future generations to using the Project site for the proposed land uses.

With the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in a retail/commercial setting, the proposed Project would not involve the routine use, transport, or disposal of hazardous materials. Also, as discussed in Section IV.A (Impacts Found to be Less than Significant, refer to Hazards and Hazardous Materials), during Project construction the Project Applicant would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. Additionally, the Project Applicant would be required to implement the City's Standard Mitigation Measures HAZ-1 and HAZ-2 related to the potential presences of asbestos containing materials and lead based paint, respectively. Additionally, because the Project site is located within a Methane Buffer zone, any development of the site is subject to the requirements of LAMC Section 91.106.41, as well as LAMC Ordinance No. 161,552. Through compliance with the requirements of the LAMC, the Project would not result in any significant impacts related to methane. No significant environmental (contamination) issues occur at the site, and no further

investigations relative to the environmental conditions on the site are needed. Therefore, the proposed Project would not result in irreversible damage that could result from environmental accidents.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

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### INTRODUCTION

Section 21002.1(a) of the CEQA Statutes (Public Resources Code) states the following:

*The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided.*

More specifically, Section 15126.6 of the *CEQA Guidelines* requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are deemed “infeasible.”

Section 15126.6(a) of the *CEQA Guidelines* states the following:

*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the similar merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

### Purpose

Section 15126.6(b) of the *CEQA Guidelines* states the following:

*Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, 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, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.*

## **Selection of a Reasonable Range of Alternatives**

Section 15126.6(c) of the *CEQA Guidelines* states the following:

*The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*

## **Level of Detail**

The *CEQA Guidelines* do not require the same level of detail in the alternatives analysis as in the analysis of the proposed project. Section 15126.6(d) of the *CEQA Guidelines* states the following:

*The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.*

## **Alternatives Rejected as Being Infeasible**

### ***Alternate Project Site Alternative***

This alternative considered development of the Project on an alternate site in the City. However, this alternative was rejected for further analysis, because although the Project Applicant owns another property in the Project area (at 1430 Washington Street), the Project Applicant is currently in the process of obtaining entitlements for development of this property. Development of the Project on the 1430 Washington Street property would result in environmental impacts similar to those identified in this EIR, including the significant and unavoidable impact related to construction noise, due to similar existing environmental conditions as those associated with the Project Site (i.e., the developed nature of the Project area, the extent of construction activity associated with the Project, the mix of existing land uses and location of sensitive receptors, traffic volumes, and air quality and noise levels).

## **Assumptions and Methodology**

To develop Project alternatives, the EIR preparers considered the Project objectives and the significant impacts identified in Section IV of this EIR, identified those significant impacts that could be substantially avoided or reduced through an alternative, and determined the modifications to the Project that would be needed (refer to Table VI-24 at the end of this section) to meet most of the basic Project objects and substantially reduce or avoid the significant impacts of the Project. The objectives of the Project are as follows:

1. To provide infill housing development, including very low-income units, to serve the local community.
2. To provide a development that is compatible and complementary with surrounding land uses.
3. To provide adequate parking facilities to serve the proposed development residents and guests.
4. To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.
5. To provide development that is financially viable.
6. To provide a mix of housing options combining multi-family development with townhome units.

Significant impacts identified in this EIR include the following:

- Construction-related regional air quality impacts (significant and unavoidable);
- Construction-related noise impacts (significant and unavoidable);
- Bicycle, Pedestrian, and Vehicle Safety (can be mitigated to less than significant); and
- Cumulative impacts related to library services (can be mitigated to less than significant).

The alternatives analysis in this section compares the potential significant environmental impacts of the alternatives with those of the project for each of the environmental topics analyzed in detail in Section IV of this EIR (refer to Table VI-24 at the end of this section).

### **A. NO PROJECT ALTERNATIVE**

CEQA requires the alternatives analysis to include a “no project” alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (*CEQA Guidelines* Section 15126.6[e][1]). Pursuant to *CEQA Guidelines* Section 15126.6(e)(2), requirements of the analysis of the “no project” alternative are as follows:



*The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.*

At the time the notice of preparation (NOP) was published for the project, there was no evidence that another project at the Project site would be forthcoming in the event the project is not approved. Thus, for the purposes of this EIR, the No Project Alternative assumes that the project site would remain in its current condition (i.e., developed with the catering facility). Although no new development would occur on the project site under the No Project Alternative, this alternative assumes the development of the related projects in the area of the project site. The potential environmental impacts associated with the No Project Alternative are described below and are compared to the environmental impacts associated with the project (also refer to Table VI-24 at the end of this section).

### **Aesthetics**

Under Alternative A, demolition of the existing catering facility would not occur, and no new land uses would be developed at the Project site. Thus, no change to the visual character of the site and surrounding area or scenic resources would occur. Therefore, the less-than-significant aesthetics impacts related to visual character and scenic resources that would occur under the Project would not occur under this alternative.

### **Air Quality**

Because Alternative A would not include any demolition or construction activities or development of new uses at the Project site, the significant-and-unavoidable construction-related regional pollutant emissions impacts and the less-than-significant impacts associated with operational pollutant emissions that would occur under the Project would not occur under Alternative A.

### **Cultural Resources**

Under Alternative A, demolition of the existing catering facility would not occur, and no new land uses would be developed at the Project Site. Thus, no potential inconsistencies with the University Park Overlay Zone would occur. Therefore, the less-than-significant impacts related to historic resources that would occur under the Project would not occur under this alternative.

### **Greenhouse Gas Emissions**

Under Alternative A, no demolition or construction activities or development of new residential land uses at the Project site would occur. The existing catering business would continue to operate and generate approximately 731.22 metric tons of CO<sub>2</sub>e per year. As discussed in Section IV.E (Greenhouse Gas

Emissions), the Project would generate a net increase of 1,413.95 metric tons of CO<sub>2</sub>e per year with implementation of various GHG reduction measures. The Project's net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant. Alternative A would avoid this less-than-significant impact that would occur under the Project.

### **Hydrology and Water Quality**

Under Alternative A, no exterior construction activities or development of new land uses would occur. Therefore, the less-than-significant water quality impacts related to construction and post-development that would occur under the Project would not occur under this alternative. It should be noted that the effectiveness of any existing water quality best management practices (BMPs) used at the Project Site might not meet current water quality standards, and the quality of water drainage from the site would not improve, as would occur under the Project.

### **Land Use and Planning**

Under Alternative A, no development of new uses at the Project site would occur. Therefore, the less-than-significant land use and planning impacts that would occur under the Project would not occur under this alternative.

### **Noise**

Under Alternative A, no demolition or construction activities or development of new uses at the Project Site would occur. Therefore, the significant and unavoidable construction-related noise impact that would occur under the Project would not occur under this alternative. Additionally, Alternative A would avoid all of the other less-than-significant noise impacts that would occur under the Project.

### **Population and Housing**

Under Alternative A, no new residential land uses would be developed at the Project site, and no new housing or residential population would occur at the Project site. Therefore, the less-than-significant impacts related to population and housing that would occur under the Project would not occur under this alternative.

### **Public Services**

Under Alternative A, no new land uses would be developed at the Project site, and no additional or altered demand for public services would occur. Therefore, the less-than-significant impacts related to fire, police, school, and parks and recreational services and the less-than-significant cumulative impact (with

mitigation) related to library services that would occur under the Project would not occur under this alternative.

### **Traffic/Transportation**

Under Alternative A, no demolition or construction activities or development of new uses at the Project site would occur. Therefore, the less-than-significant traffic impacts that would occur under the Project would not occur under Alternative A.

### **Utilities**

Under Alternative A, no construction activities or development of new uses at the Project site would occur, and no additional/alterd demand for utilities would occur. Therefore, the less-than-significant impacts related to utilities that would occur under the Project would not occur under this alternative.

### **Relationship of Alternative A to the Project Objectives**

Alternative A would not meet any of the Project objectives.

## **B. REDUCED DENSITY ALTERNATIVE**

The Reduced Density Alternative (herein “Alternative B”) assumes the entire Project site would be rezoned to R3 (Multi-Family Residential) and developed with a total of 111 for-sale dwelling units, including 103 dwelling units in two buildings and 8 dwelling units in four duplexes. The siting of the buildings and duplexes under this alternative would be similar to that under the Project. The R3 zoning permits a floor area ratio of 3:1; consequently, the 88,825 square foot project site would have a maximum development potential of 266,475 square feet of buildable space (excluding subterranean parking). Building heights would range from approximately 30 to 55 feet above ground level (three- to five-stories), with the tallest five-story portion fronting on Washington Boulevard. The central portion would step-down to four stories, while the southern portion fronting on 20<sup>th</sup> Street would step down again to three-stories. The 111 dwelling units would comprise 8 four-bedroom units, 19 three-bedroom units, 59 two-bedroom units, and 25 one-bedroom units, ranging in size from 700 square feet to 2,100 square feet. Alternative B would include 14,600 square feet of open space in compliance with LAMC open space requirements, compared to the 21,722.61 square feet required under the Project.<sup>1</sup> Also, in compliance with LAMC parking requirements, Alternative B would include 2.25 parking spaces per dwelling unit for a total of 250 spaces, compared to the 320 parking spaces required under the Project. Similar to the Project, the parking spaces also would be located in two subterranean levels. Vehicular access would be

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<sup>1</sup> Pursuant to LAMC Section 12.21.G, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms.

from Oak Street, similar to that provided by the proposed project. Also, similar to the proposed project, gated access for pedestrians would be from the Washington Boulevard, Oak Street, and 20<sup>th</sup> Street frontages. Similar to the Project, all of the development under Alternative B would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan, Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting requirements.

### **Aesthetics**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of 111 dwelling units, including 103 dwelling units in two buildings and eight dwelling units in four duplexes. The siting of the buildings and duplexes and the architecture and style under this alternative would be similar to that under the Project. However, the maximum height of two larger buildings would extend to 55 feet (as opposed to a maximum of 65.5 feet under the Project). Similar to the Project, Alternative B would include residential lighting in compliance with LAMC lighting requirements. This EIR concluded that Project impacts related to aesthetics would be less than significant. Because Alternative B would include less development than under the Project but would be similar in architecture and style and would include similar types of residential lighting, impacts related to aesthetics would be less than significant under Alternative B, similar to the Project.

### **Air Quality**

Under Alternative B, the existing catering building would be demolished and removed from the Project site. The site would be excavated in preparation for construction of two levels of subterranean parking and the foundation, and the site would be developed with a total of four structures housing 111 dwelling units. This EIR concluded that Project impacts related to consistency with the applicable Air Quality Management Plan (AQMP), localized construction emissions, operational emissions, localized CO emissions, and toxic air contaminant (TACs) would be less than significant. However, Project impacts related to regional construction NO<sub>x</sub> emissions would be significant and unavoidable, largely due to off-road diesel-powered equipment and soil hauling associated with excavation. Under Alternative B, the amount of excavation required would be approximately the same as under the Project, but the total amount of square footage that would be constructed would be less. Thus, the amount of construction- and operational-related pollutant emissions associated with Alternative B would be less than under the Project. Therefore, impacts related to consistency with the applicable AQMP, localized construction emissions, operational emissions, localized CO emissions, and TACs under Alternative B would be less than significant, similar to the Project. However, because Alternative B would require approximately the same amount of excavation and need for off-site transport, the amount of regional construction-related NO<sub>x</sub> emissions generated by Alternative B would be approximately the same as the Project and would result in significant unavoidable impacts, similar to the Project.

## **Cultural Resources**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of 111 dwelling units, including 103 dwelling units in two buildings and 8 dwelling units in four duplexes. The siting of the buildings and duplexes and the architecture and style under this alternative would be similar to that under the Project. However, the maximum height of two larger buildings would extend to 55 feet (as opposed to a maximum of 65.5 feet under the Project). This EIR concluded that the design of the Project would effectively conform to the letter and spirit of the *University Park HPOZ Preservation Plan Design Guidelines*, and impacts to the University Park HPOZ would be less than significant. Because Alternative B would include less development than under the Project and would comply with all applicable design standards, impacts related to the University Park HPOZ would be less than significant under Alternative B, similar to the Project.

## **Greenhouse Gas Emissions**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of 111 dwelling units. As discussed in Section IV.E (Greenhouse Gas Emissions), the Project would generate a net increase of 1,413.95 metric tons of CO<sub>2</sub>e per year with implementation of various GHG reduction measures. The Project's net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant. Because Alternative B would include less development than the Project, the amount of GHG emissions generated under Alternative B would be less than the Project, and impacts related to GHG emissions under this alternative would be less than significant, similar to the Project.

## **Hydrology and Water Quality**

Similar to the Project, under Alternative B, a Standard Urban Storm Water Management Plan (SUSMP) would be required, in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit. The SUSMP would detail the treatment measures and BMPs to control pollutants and would include an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. Preparation and implementation of the SUSMP would ensure that water quality impacts under Alternative B would be minimized and that the alternative would not violate any water quality standards. Therefore, similar to the Project, water quality impacts under Alternative B would be less than significant.

## **Land Use and Planning**

Alternative B includes demolition and removal of the existing catering building and development of the Project site with a reduced version of the Project (i.e., 111 residential units versus 142 residential units). The buildings under this alternative would be similar in siting, architecture, and style to those under the Project. This EIR concluded that the Project would be substantially consistent with all applicable plans, policies and regulations, and impacts related to land use and planning under the Project would be less than significant. Because Alternative B is similar but smaller than the Project, impacts related to land use and planning under this alternative would also be less than significant, similar to the Project.

## **Noise**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of four structures housing 111 dwelling units. The overall amount of construction would be less under this alternative than would occur under the Project, although not substantially different in terms of the types and amount of construction equipment that would be required to develop Alternative B. This EIR concluded that construction-related noise levels under the Project would exceed the City's threshold, and the impact would be significant and unavoidable. Alternative B would also generate similar noise levels during construction that would exceed the City's threshold. Thus, construction-related noise impacts under Alternative B would be significant and unavoidable, as well. Alternative B includes rooftop HVAC equipment and subterranean parking, similar to the Project, but with fewer units it would generate fewer traffic trips. This EIR concluded that the Project's operational noise impacts would be less than significant. Thus, operational noise impacts under Alternative B would also be less than significant.

## **Population and Housing**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of four structures housing 111 dwelling units, which would generate approximately 389 residents. As discussed in Section IV.I (Population and Housing), the Project's development of 144 dwelling units and generation of approximately 497 residents would be within SCAG's employment projections for the City and the South Los Angeles Community Plan (the "Community Plan") area, and would not result in substantial, unplanned population growth; associated impacts were found to be less than significant. Because Alternative B would develop fewer residential dwelling units and generate fewer residents than the Project, this alternative also would not cause substantial, unplanned population growth, and no significant impacts would occur, similar to the Project.

## **Public Services**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of four structures housing 111 dwelling units. The Project would generate approximately 497 residents. The analysis in this EIR concluded that Project

impacts related to public services would be less than significant, and the Project's contribution to library services would be less than significant with mitigation. Alternative B includes development of 31 fewer dwelling units than under the Project, resulting in approximately 109 fewer residents than the Project. Thus, this alternative would have less of a demand for public services than the Project. Therefore, similar to the Project, impacts related to public services would be less than significant under Alternative B. Additionally, Mitigation Measure J-11 would also apply to this alternative and would ensure that the alternative's contribution to cumulative impacts to library services would be less than significant, similar to the Project.

### **Traffic/Transportation**

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of four structures housing 111 dwelling units, and subterranean parking with 250 parking spaces. This EIR concluded that proposed Project impacts related to the following traffic issues would be less than significant: intersection capacity; neighborhood intrusion; bicycle, pedestrian, and vehicular safety (with mitigation); transit; in-street construction; and parking.

Because this alternative would include the same land uses as proposed under the Project but with 31 fewer residential units than the proposed Project, Alternative B would generate fewer daily and peak-hour traffic trips. This Alternative would not result in any significant impacts related to intersection capacity or neighborhood intrusion, similar to the Project.

This EIR concluded that the Project's generation of transit trips (2 AM peak-hour trips, 3 PM peak-hour trips, and 24 daily trips) would not result in any significant impacts. Because Alternative B includes approximately 20 percent fewer dwelling units than the Project, the number of transit trips under this alternative would be fewer, as well. Thus, Alternative B would not result in any significant impacts related to transit, similar to the Project.

Construction activities and the amount of construction equipment that would be used for Alternative B would be similar to that under the proposed Project (although, possibly somewhat less due to the reduction in the overall amount of development), and the types of construction-related traffic impacts that would occur under this alternative would be similar to those identified for the proposed Project. Thus, impacts related to in-street construction under Alternative B would also be less than significant with mitigation.

The number of parking spaces provided under Alternative B would comply with LAMC parking requirements, and no significant impacts would occur, similar to the Project.

## Utilities

Under Alternative B, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a total of four structures housing 111 dwelling units. This EIR concluded that Project impacts related to utilities would be less than significant. Alternative B includes 31 fewer dwelling units than the Project. Thus, the amount of water, electricity, and natural gas consumption and the amount of wastewater and solid waste generation under this alternative would be less than under the Project. Therefore, impacts related to utilities under Alternative B would be less than significant, similar to the Project.

## Relationship of Alternative B to the Project Objectives

Alternative B would meet the following Project objectives:

2. To provide a development that is compatible and complementary with surrounding land uses.
3. To provide adequate parking facilities to serve the proposed development residents and guests.
4. To mitigate, to the extent feasible, the potential environmental impacts of the proposed Project.
5. To provide development that is financially viable.
6. To provide a mix of housing options combining multi-family development with townhome units.

Alternative B would not meet the following Project objective:

1. To provide infill housing development, including very low-income units, to serve the local community.

## C. ALTERNATE LAND USE MIX

The Alternate Land Use Mix Alternative (herein “Alternative C”) assumes development of the Project site consistent with the existing *General Plan* land use designation for the site and three zoning categories, without the need for zone changes or *General Plan* amendments. The northern 32,813-square-foot portion of the Project site, currently zoned C2 with a FAR of 1.5:1, would be developed with approximately 49,220 square feet of commercial land uses, including 12,000 square feet of retail land uses and 37,220 square feet of office land uses, in a four-story/55-foot structure fronting on Washington Boulevard. Two levels of subterranean parking with a total of 98 spaces would be provided below the retail/office structure (refer to Table VI-1). The central 23,550-square-foot portion of the Project site, currently zoned P-1, would be developed with a surface-grade parking lot to provide additional parking for the retail/office building and two subterranean parking levels for the adjacent residential component. A total of approximately 120 spaces would be provided within this central portion. The southern 32,465-square-foot portion of the Project site, currently zoned R3 with a FAR of 3:1, would be developed with an



approximately 97,386-square-foot, three-story/40-foot tall building housing 40 residential condominium units over multi-level subterranean parking with 90 parking spaces. Similar to the Project, all of the development under Alternative C would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting requirements. The residential condominium portion of the alternative would require approval of a tract map.

**Table VI-1**  
**Alternative C Summary**

<b>Land Use</b>	<b>Size</b>	<b>Building Heights</b>
Retail	12,000 sf	4 stories/55 feet
Office	37,220 sf	
Residential	40 du/97,386 sf	3 stories/40 feet
Parking	308 spaces	NA
<i>sf = square feet                      du = dwelling unit</i>		

## **Aesthetics**

Under Alternative C, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site; a surface-grade parking lot with two levels of subterranean parking on the central portion of the site; and a three-story/40-foot residential structure, housing 40 condominium units on the southern portion of the site. Overall, Alternative C would include development of less square footage than the Project. Similar to the Project, all of the development under Alternative C would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting requirements. This EIR concluded that Project impacts related to aesthetics would be less than significant. Because Alternative C would include less development than under the Project and would comply with all applicable design and lighting standards, impacts related to aesthetics would be less than significant under Alternative C, similar to the Project.

## **Air Quality**

This EIR concluded that Project impacts related to consistency with the applicable AQMP, localized construction emissions, operational emissions, localized CO emissions, and TACs would be less than significant. However, Project impacts related to regional construction NO<sub>x</sub> emissions would be significant and unavoidable, largely due to off-road diesel-powered equipment and soil hauling associated with excavation. Under Alternative C, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site; a surface-grade parking lot with two levels of subterranean parking on the central portion of the site; and a three-story/40-foot residential

structure, housing 40 condominium units on the southern portion of the site. Under Alternative C, the overall amount of excavation and square footage that would be constructed would be less than under the Project. Thus, the overall amount of construction emissions associated with Alternative C would be less than under the Project, and construction-related emissions impacts would be reduced when compared to the Project.

As shown on Tables VI-2 and VI-3, the amount of daily operational emissions and localized CO concentrations (respectively) for Alternative C would not exceed the significance thresholds, and impacts would be less than significant, similar to the Project. Also, Alternative C would not generate large volumes of truck traffic, and thus, would not result in significant impacts related to toxic air contaminants (TACs), similar to the Project.

**Table VI-2**  
**Estimated Future Daily Operational Emissions – Alternative C**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
<b>Alternative C Emissions</b>	8.97	16.79	67.70	0.12	13.54	0.92
<i>Threshold</i>	<i>55.00</i>	<i>55.00</i>	<i>550.00</i>	<i>150.00</i>	<i>150.00</i>	<i>55.00</i>
<i>Significant Impact?</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Project Emissions</b>	8.52	12.51	58.73	0.10	10.02	1.15
<b>Wintertime (Non-Smog Season) Emissions</b>						
<b>Alternative C Emissions</b>	9.13	17.97	65.92	0.11	13.55	0.93
<i>Threshold</i>	<i>55.00</i>	<i>55.00</i>	<i>550.00</i>	<i>150.00</i>	<i>150.00</i>	<i>55.00</i>
<i>Significant Impact?</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Project Emissions</b>	8.81	13.44	57.82	0.09	10.03	1.16

Source: CAJA Environmental Services, 2012. Calculation sheets are included in Appendix VI.

## Cultural Resources

Under Alternative C, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site; a surface-grade parking lot with two levels of subterranean parking on the central portion of the site; and a three-story/40-foot residential structure, housing 40 condominium units on the southern portion of the site. Similar to the buildings under the Project, under Alternative C, the design of the buildings in the southern portion of the Project site would take their cue from the contributing buildings in the 20<sup>th</sup> Street National Register District across the street. Under the Project, the residential buildings in the southern portion of the site would be 35 feet tall, whereas the building under Alternative C would be 40 feet tall, a difference of only 5 feet. The front yard setback would be 19 feet, similar to that of the contributing buildings. The buildings would make reference to the contributing buildings in the form of the roofs, materials, color, fenestration pattern and type, and architectural features such as porches and chimneys. Overall, Alternative C would include development of less square footage than the Project. Similar to the Project, all of the development under Alternative C

would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*. This EIR concluded that the design of the Project would effectively conform to the letter and spirit of the *University Park HPOZ Preservation Plan Design Guidelines*, and impacts to the University Park HPOZ would be less than significant. Because Alternative C would include less development than under the Project and would comply with all applicable design standards, impacts related to the University Park HPOZ would be less than significant under Alternative C, similar to the Project.

**Table VI-3  
Localized Carbon Monoxide Concentrations – Alternative C**

Intersection	CO Concentrations in Parts per Million <sup>a</sup>							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Union and Washington – Alt. C	4.0	2.9	3.6	2.6	3.5	2.6	3.4	2.5
Union and Washington – Project	4.2	3.1	3.8	2.8	3.7	2.7	3.5	2.5
Figueroa and Washington - Alt. C	4.9	3.5	4.3	3.1	4.0	2.9	3.8	2.7
Figueroa and Washington – Project	5.6	4.0	4.8	3.4	4.4	3.2	4.1	2.9
Figueroa and 23 <sup>rd</sup> – Alt. C	4.4	3.2	3.9	2.8	3.7	2.7	3.5	2.6
Figueroa and 23 <sup>rd</sup> – Project	4.9	3.6	4.3	3.1	4.0	2.9	3.7	2.7
<sup>a</sup> The federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm. National and state 8-hour standards are 9.0 parts per million. Source: CAJA Environmental Services, 2012. Calculation sheets are included in Appendix VI.								

## Greenhouse Gas Emissions

Under Alternative C, the existing catering building would be demolished and removed from the Project site, and the site would be developed with 40 dwelling units and 97,386 square feet of retail and office land uses. As discussed in Section IV.E (Greenhouse Gas Emissions), the Project would generate a net increase of 1,413.95 metric tons of CO<sub>2</sub>e per year with implementation of various GHG reduction measures. The Project's net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant. Because Alternative C would include construction and operation of less development than the Project, the amount of GHG emissions generated under Alternative C would be less than the Project, and impacts related to GHG emissions under this alternative would be less than significant, similar to the Project.

## Hydrology and Water Quality

Similar to the Project, under Alternative C, a SUSMP would be required, in accordance with the NPDES General Permit. The SUSMP would detail the treatment measures and BMPs to control pollutants and would include an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. Preparation

and implementation of the SUSMP would ensure that water quality impacts under Alternative C would be minimized and that the alternative would not violate any water quality standards. Therefore, similar to the Project, water quality impacts under Alternative C would be less than significant.

### **Land Use and Planning**

Alternative C includes development of the Project site in accordance with land uses that are allowed under the existing land use designation and zoning for the site. This EIR concluded that the proposed Project would be substantially consistent with most of the applicable plans, policies, and regulations, but would be inconsistent with those policies related to developing mixed-land uses along Washington Boulevard. Thus, this alternative would be consistent with all applicable plans, policies, or regulations, including those policies for which the Project would be inconsistent. Therefore, similar to the Project, impacts related to land use and planning under Alternative C would also be less than significant.

### **Noise**

Under Alternative C, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site with 98 subterranean parking spaces; a surface-grade parking lot with two levels of subterranean parking (total of 120 spaces) on the central portion of the site; and a three-story/40-foot residential structure, housing 40 condominium units on the southern portion of the site with 90 subterranean parking spaces. This EIR concluded that construction-related noise levels under the Project would exceed the City's threshold, and the impact would be significant and unavoidable. Alternative C would also generate similar noise levels during construction that would exceed the City's threshold. Thus, construction-related noise impacts under Alternative C would be significant and unavoidable, as well. Alternative C includes rooftop HVAC equipment and subterranean parking, similar to the Project. This EIR concluded that Project noise impacts related to HVAC equipment and subterranean parking would be less than significant. Thus, these noise impacts under Alternative C would also be less than significant. Alternative C would generate approximately 14 percent more daily traffic trips (refer to Table VI-4). Table IV.H-12 in Section IV.H (Noise) shows that the greatest increase in traffic noise associated with the Project would be 0.1 dBA along 23<sup>rd</sup> Street between Toberman Street and Oak Street. The increase in traffic associated with Alternative C would increase traffic noise levels along this roadway by less than 1.0 dBA, which is well below the significance threshold of 5.0 dBA. Thus, similar to the Project, traffic noise impacts of Alternative C would be less than significant.

### **Population and Housing**

Under Alternative C, the existing catering building would be demolished and removed from the Project site, and the site would be developed with 40 dwelling units and 97,386 square feet of retail and office

land uses, which would generate approximately 140 residents and approximately 157 employees.<sup>2</sup> As discussed in Section IV.I (Population and Housing), the Project's development of 144 dwelling units and generation of approximately 497 residents would be within SCAG's employment projections for the City and the Community Plan area, and would not result in substantial, unplanned population growth; associated impacts were found to be less than significant. Alternative C would develop fewer residential dwelling units and generate fewer residents than the Project. Also, the type of employment associated with Alternative C (retail and office jobs) likely could be filled by people in the existing region and would not cause people to move from outside of the region to fill employment positions. For these reasons, this alternative also would not cause substantial, unplanned population growth, and no significant impacts would occur, similar to the Project.

### **Public Services**

Under Alternative C, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site; a surface-grade parking lot with two levels of subterranean parking on the central portion of the site; and a three-story/40-foot residential structure, housing 40 condominium units on the southern portion of the site. The analysis in this EIR concluded that Project impacts related to public services would be less than significant, and the Project's contribution to library services would be less than significant with mitigation. Alternative C includes development of 102 fewer dwelling units than under the Project (resulting in approximately 357 fewer residents than the Project), which would create much less demand for public services than the Project. Retail/office uses generate virtually no demand for school, recreational, and library services, and because retail/office uses typically do not operate 24 hours per day, the demand for fire and police services is generally less, as well. Thus, this alternative would have less of a demand for public services than the Project and impacts related to public services would be less than significant under Alternative C. Mitigation Measure J-11 would also apply to this alternative and would ensure that the residential component of the alternative's contribution to cumulative impacts to library services would be less than significant, similar to the Project.

### **Traffic/Transportation**

Under Alternative C, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site with 98 subterranean parking spaces; a surface-grade parking lot with two levels of subterranean parking (total of 120 spaces) on the central portion of the site; and a three-story/40-foot tall residential structure, housing 40 condominium units on the southern portion of the

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<sup>2</sup> Office Employees:  $37,220 \text{ sf} / 1,000 \text{ sf} \times 3.4965 \text{ employees per sf} = 130 \text{ employees}$ . Retail Employees:  $12,000 \text{ sf} / 1,000 \text{ sf} \times 2.2371 \text{ employees per sf} = 27 \text{ employees}$ .  $130 \text{ employees} + 27 \text{ employees} = 157 \text{ employees}$ . Employee Generation Rate Source: Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-1, September 2002

site with 90 subterranean parking spaces. This EIR concluded that proposed Project impacts related to the following traffic issues would be less than significant: intersection capacity; neighborhood intrusion; bicycle, pedestrian, and vehicular safety (with mitigation); transit; in-street construction; and parking.

As shown on Table VI-4, Alternative C would result in 67 more daily traffic trips than the Project, 29 more morning peak-hour trips, and 24 more afternoon peak-hour trips. The traffic analysis prepared for the Project concluded that the Project would not result in any significant LOS impacts. As shown on Tables VI-5 and VI-6, Alternative C would not result in a significant impact during the peak hours, similar to the Project.

**Table VI-4**  
**Alternative C Trip Generation**

Use	Size	Daily Trips	AM Peak Hour	PM Peak Hour
Retail <sup>1</sup>	12,000 sf	515	12	45
<i>Less 50% Pass-by Trips</i>		<i>(258)</i>	<i>(7)</i>	<i>(23)</i>
Office <sup>2</sup>	37,220 sf	410	58	55
Condominium <sup>3</sup>	40 du	234	18	21
<i>Total Alternative C Traffic</i>		<i>901</i>	<i>81</i>	<i>98</i>
<i>Less Existing Traffic</i>		<i>(350)</i>	<i>(35)</i>	<i>(23)</i>
<b>Net Alternative C Traffic</b>		<b>551</b>	<b>46</b>	<b>75</b>
<b>Net Project Traffic</b>		<b>484</b>	<b>27</b>	<b>51</b>
<i>du = dwelling unit                      gsf = gross square feet</i> <sup>1</sup> ITE Land Use Code 820 (Shopping Center) trip generation average rates - Daily Trip Rate: 42.94 trips/1,000 sf (50% inbound/50% outbound) - AM Peak-Hour Trip Rate: 1.03 trips/1,000 sf (61% inbound/39% outbound) - PM Peak-Hour Trip Rate: 3.75 trips/1,000 sf (48% inbound/52% outbound) <sup>2</sup> ITE Land Use Code 710 (General Office Building) trip generation average rates. - Daily Trip Rate: 11.01 trips/1,000 sf (50% inbound/50% outbound) - AM Peak-Hour Trip Rate: 1.55 trips/1,000 sf (88% inbound/12% outbound) - PM Peak-Hour Trip Rate: 1.49 trips/1,000 sf (17% inbound/83% outbound) <sup>3</sup> ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates. - Daily Trip Rate: 5.86 trips/du (50% inbound/50% outbound) - AM Peak-Hour Trip Rate: 0.44 trip/du (17% inbound/83% outbound) - PM Peak-Hour Trip Rate: 0.52 trip/du (67% inbound/33% outbound)				

This EIR concluded that the Project's generation of transit trips (2 AM peak-hour trips, 3 PM peak-hour trips, and 24 daily trips) would not result in any significant impacts. Alternative C would generate approximately 3 AM peak-hour transit trips, 4 PM peak-hour transit trips, and 27 daily transit trips. As discussed in Section IV.K (Transportation/Traffic), the three transit lines serving the Project area provide service for an average of (i.e., average of the directional number of buses during the peak hours) 31 buses during the morning peak hour and 30 buses during the afternoon peak hour. It is anticipated that the existing transit service in the Project area could adequately accommodate transit trips generated by Alternative C. Given the low number of transit trips per bus and based on the calculated number of

generated transit trips, no impacts on existing or future transit services in the Project area would occur as a result of Alternative C, similar to the Project.

**Table VI-5  
Existing-Plus-Alternative C - LOS**

No.	Intersection	Peak Hour	Existing		Existing With Alternative C		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1	Union Ave/ Washington Ave	AM	0.689	B	0.690	B	0.001	NO
		PM	0.649	B	0.655	B	0.006	NO
2	Union Ave/ 23 <sup>rd</sup> St	AM	0.529	A	0.536	A	0.007	NO
		PM	0.510	A	0.519	A	0.009	NO
3	Toberman St/ 18 <sup>th</sup> St-Harbor Freeway SB Off-Ramp	AM	0.119	A	0.119	A	0.000	NO
		PM	0.072	A	0.073	A	0.001	NO
4	Harbor Freeway SB On-Ramp/ Washington Blvd	AM	0.472	A	0.473	A	0.001	NO
		PM	0.583	A	0.584	A	0.001	NO
5	Oak St/ Washington Blvd	AM	0.314	A	0.324	A	0.010	NO
		PM	0.271	A	0.278	A	0.007	NO
6	Oak St-Scarff St/ 23 <sup>rd</sup> St	AM	0.282	A	0.291	A	0.009	NO
		PM	0.257	A	0.273	A	0.016	NO
7	Figueroa St/ Washington Blvd	AM	0.717	C	0.717	C	0.000	NO
		PM	0.713	C	0.714	C	0.001	NO
8	Figueroa St/ 23 <sup>rd</sup> St	AM	0.540	A	0.542	A	0.002	NO
		PM	0.608	B	0.617	B	0.009	NO
Source: LLG, 2012.								

Construction activities and the amount of construction equipment that would be used for Alternative C would be similar to that under the proposed Project (although, possibly somewhat less due to the reduction in the overall amount of development), and the types of construction-related traffic impacts that would occur under this alternative would be similar to those identified for the proposed Project. Thus, impacts related to in-street construction under Alternative C would also be less than significant with mitigation.

The number of parking spaces provided under Alternative C would comply with LAMC parking requirements, and no significant impacts would occur, similar to the proposed Project.

### Utilities

Under Alternative C, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 49,200-square-foot retail/office structure on the northern portion of the Project site; a surface-grade parking lot with two levels of subterranean parking on the central portion of the site; and a three-story/40-foot residential structure, housing 40 condominium units on the southern portion of the site.

**Table VI-6  
Future-With-Alternative C - LOS**

No.	Intersection	Peak Hour	Future Without Alternative C		Future With Alternative C		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1	Union Ave/ Washington Ave	AM	0.770	C	0.771	C	0.001	NO
		PM	0.759	C	0.765	C	0.006	NO
2	Union Ave/ 23 <sup>rd</sup> St	AM	0.581	A	0.589	A	0.008	NO
		PM	0.591	A	0.600	A	0.009	NO
3	Toberman St/ 18 <sup>th</sup> St-Harbor Freeway SB Off-Ramp	AM	0.127	A	0.127	A	0.000	NO
		PM	0.079	A	0.080	A	0.001	NO
4	Harbor Freeway SB On-Ramp/ Washington Blvd	AM	0.543	A	0.544	A	0.001	NO
		PM	0.668	B	0.669	B	0.001	NO
5	Oak St/ Washington Blvd	AM	0.337	A	0.346	A	0.009	NO
		PM	0.300	A	0.307	A	0.007	NO
6	Oak St-Scarff St/ 23 <sup>rd</sup> St	AM	0.289	A	0.298	A	0.009	NO
		PM	0.261	A	0.277	A	0.016	NO
7	Figueroa St/ Washington Blvd	AM	0.914	E	0.914	E	0.000	NO
		PM	0.990	E	0.998	E	0.008	NO
8	Figueroa St/ 23 <sup>rd</sup> St	AM	0.654	B	0.657	B	0.003	NO
		PM	0.869	D	0.878	D	0.009	NO
Source: LLG, 2012.								

### Wastewater

The proposed Project would generate approximately 24,785 gallons of wastewater per day. The analysis in this EIR concluded that Project impacts related to wastewater supply would be less than significant. As shown on Table VI-7, Alternative C would generate less wastewater than the Project. Therefore, impacts related to wastewater service under Alternative C would be less than significant, similar to the Project.

**Table VI-7  
Estimated Net Wastewater Generation of Alternative C**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (gpd)
Residential <sup>b</sup>	40 du	160 gpd/du	6,400
Retail	12,000 sf	80 gpd/1,000 sf	960
Office	37,220 sf	150 gpd/1,000 sf	5,583
<b>Subtotal Generation</b>			<b>12,943</b>
<i>Less Existing Consumption</i>			<i>1,399</i>
<b>Total Net Consumption</b>			<b>11,544</b>
gpd = gallons per day      du = dwelling unit      sf = square feet <sup>a</sup> City of Los Angeles Bureau of Sanitation, Sewer Generation Rates, March 27, 2009. Water consumption is assumed to be approximately 120 percent of wastewater generation. <sup>b</sup> All units are assumed as two-bedroom units.			



### Water

The proposed Project would consume approximately 29,743 gallons of water per day. The analysis in this EIR concluded that Project impacts related to water service would be less than significant. As shown on Table VI-8, Alternative C would consume less water than the Project. Therefore, impacts related to water service under Alternative C would be less than significant, similar to the Project.

**Table VI-8**  
**Estimated Net Water Consumption of Alternative C**

Land Use	Size	Consumption Rate <sup>a</sup>	Consumption (gpd)
Residential <sup>b</sup>	40 du	192 gpd/du	7,680
Retail	12,000 sf	92 gpd/1,000 sf	1,104
Office	37,220 sf	168 gpd/1,000 sf	6,253
<b>Subtotal Consumption</b>			<b>15,037</b>
<i>Less Existing Consumption</i>			<i>1,678</i>
<b>Total Net Consumption</b>			<b>13,359</b>
gpd = gallons per day      du = dwelling unit      sf = square feet			
<sup>a</sup> City of Los Angeles Bureau of Sanitation, Sewer Generation Rates, March 27, 2009. Water consumption is assumed to be approximately 120 percent of wastewater generation.			
<sup>b</sup> All units are assumed as two-bedroom units.			

### Solid Waste

The proposed Project would generate approximately 3,248 tons of solid waste during the demolition/construction phase and 0.09 tons of solid waste per day during the Project's operational phase. The analysis in this EIR concluded that Project impacts related to solid waste would be less than significant. As shown on Tables VI-9 and VI-10, Alternative C would generate less solid waste during the demolition/construction and the operational phases than the Project. Therefore, impacts related to solid waste under Alternative C would be less than significant, similar to the Project.

**Table VI-9**  
**Approximate Demolition and Construction Waste Generation for Alternative C**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (tons)
<b>Demolition</b>			
Non-residential	32,930 sf	173 lbs/sf	2,848
<b>Construction</b>			
Residential	97,386 sf	4.38 lbs/sf	213
Non-residential	49,200 sf	1.95 lbs/sf	48
<b>Total Generation</b>			<b>3,109</b>
lbs = pounds      sf = square feet			
<sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.			

**Table VI-10**  
**Estimated Net Solid Waste Generation of Alternative C**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup></b>	<b>Generation (tpd)</b>
Residential	40 du	0.002 tpd/du	0.08
Retail	12,000 sf	0.000003 tpd/sf	0.04
Office	37,220 sf	0.000002 tpd/sf	0.07
<b>Subtotal Generation</b>			<b>0.19</b>
<i>Less Existing Generation</i>			<i>0.19</i>
<b>Total Net Generation</b>			<b>-</b>
<i>du = dwelling unit                      sf = square feet                      tpd = tons per day</i> <sup>a</sup> Source: California Integrated Waste Management Board website: <a href="http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm">http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm</a> , July 10, 2009			

### *Electricity*

The proposed Project would consume approximately 631,824 kilowatt hours (kWH) of electricity per year. The analysis in this EIR concluded that Project impacts related to electricity supply would be less than significant. As shown on Table VI-11, Alternative C would consume more electricity than the proposed Project. However, the amount of electricity needed for Alternative C could also be provided by the Los Angeles Department of Water and Power (DWP) and would not require development of additional sources of energy. Therefore, impacts related to electricity under Alternative C would be less than significant, similar to the proposed Project.

**Table VI-11**  
**Estimated Net Electricity Consumption of Alternative C**

<b>Land Use</b>	<b>Size</b>	<b>Consumption Rate (kWH/year)<sup>a</sup></b>	<b>Consumption (kWH/year)</b>
Residential	40 du	5,626.50/du	225,060
Retail	12,000 sf	13.55/sf	162,600
Office	37,220 sf	12.95/sf	481,999
<b>Subtotal Consumption</b>			<b>869,659</b>
<i>Less Existing Consumption</i>			<i>167,139</i>
<b>Total Net Consumption</b>			<b>702,520</b>
<i>kWH = kilowatt hours                      du = dwelling unit                      sf = square feet</i> <sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

### *Natural Gas*

The proposed Project would consume approximately 247,847 cubic feet of natural gas per day. The analysis in this EIR concluded that Project impacts related to natural gas supply would be less than significant. As shown on Table VI-12, Alternative C would consume less natural gas than would the

proposed Project. Therefore, similar to the proposed Project, impacts related to natural gas under Alternative C would be less than significant.

**Table VI-12**  
**Estimated Net Natural Gas Consumption of Alternative C**

<b>Land Use</b>	<b>Size</b>	<b>Consumption Rate (CF/month)<sup>a</sup></b>	<b>Consumption (CF/month)</b>
Residential	40 du	4,012/du	160,480
Retail	12,000sf	3.0/sf	36,000
Office	37,220 sf	2.0/sf	74,440
<b>Subtotal Consumption</b>			<b>370,920</b>
<i>Less Existing Consumption</i>			<i>37,005</i>
<b>Total Net Consumption</b>			<b>233,915</b>
<i>CF = cubic feet      du = dwelling unit      sf = square feet</i> <sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

### **Relationship of Alternative C to the Project Objectives**

Alternative C would meet the following Project objectives:

2. To provide a development that is compatible and complementary with surrounding land uses.
3. To provide adequate parking facilities to serve the proposed development residents and guests.
4. To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.
5. To provide development that is financially viable.

Alternative B would not meet the following Project objectives:

1. To provide infill housing development, including very low-income units, to serve the local community.
6. To provide a mix of housing options combining multi-family development with townhome units.

### **D. RETAIL/OFFICE DEVELOPMENT**

The Retail/Office Development Alternative (herein “Alternative D”) assumes rezoning of the entire Project site to C2 and development of the site with retail and office land uses. The C2 zoning permits a FAR of 1.5:1. Thus, the 88,825-square-foot Project site would have a maximum development potential of 133,825 square feet (excluding subterranean parking). Alternative 4 would provide 33,450 square feet of retail space on the ground floor and 100,375 square feet of office space on floors 2 through 4. Building height would be 4-stories over a subterranean parking structure. Similar to the Project, all of the

development under Alternative C would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting requirements. At a LAMC required parking ratio of 1 space per 500 square feet, Alternative D would provide a total of 266 parking spaces in two subterranean levels and on an at-grade parking lot to be located in the southern portion of the Project site. Vehicular access would be from Oak Street, similar to that provided by the proposed Project.

### **Aesthetics**

Under Alternative D, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. Overall, Alternative D would include development of less square footage than the Project. Similar to the Project, all of the development under Alternative D would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting requirements. This EIR concluded that Project impacts related to aesthetics would be less than significant. Because Alternative D would include less development than under the Project and would comply with all applicable design and lighting standards, impacts related to aesthetics would be less than significant under Alternative D, similar to the Project.

### **Air Quality**

This EIR concluded that Project impacts related to consistency with the applicable AQMP, localized construction emissions, operational emissions, localized CO emissions, and TACs would be less than significant. However, Project impacts related to regional construction NO<sub>x</sub> emissions would be significant and unavoidable, largely due to off-road diesel-powered equipment and soil hauling associated with excavation. Under Alternative D, the existing catering building would be demolished and removed from the Project Site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. The overall amount of excavation and square footage that would be constructed would be less than under the Project. Thus, the overall amount of construction emissions associated with Alternative D would be less than under the Project, and construction-related emissions impacts would be reduced when compared to the Project.

As shown on Tables VI-13 and VI-14, the amount of daily operational emissions and localized CO concentrations (respectively) for Alternative D would not exceed the significance thresholds, and impacts would be less than significant, similar to the Project. Also, Alternative D would not generate large volumes of truck traffic, and thus, would not result in significant impacts related to TACs, similar to the Project.

**Table VI-13**  
**Estimated Future Daily Operational Emissions – Alternative D**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
<b>Alternative D Emissions</b>	21.41	45.25	181.42	0.25	27.92	1.97
<i>Threshold</i>	<i>55.00</i>	<i>55.00</i>	<i>550.00</i>	<i>150.00</i>	<i>150.00</i>	<i>55.00</i>
<i>Significant Impact?</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Project Emissions</b>	8.52	12.51	58.73	0.10	10.02	1.15
<b>Wintertime (Non-Smog Season) Emissions</b>						
<b>Alternative D Emissions</b>	22.00	49.18	177.03	0.23	27.97	1.99
<i>Threshold</i>	<i>55.00</i>	<i>55.00</i>	<i>550.00</i>	<i>150.00</i>	<i>150.00</i>	<i>55.00</i>
<i>Significant Impact?</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Project Emissions</b>	8.81	13.44	57.82	0.09	10.03	1.16
<i>Source: CAJA Environmental Services, 2012. Calculation sheets are included in Appendix VI.</i>						

**Table VI-14**  
**Localized Carbon Monoxide Concentrations – Alternative D**

Intersection	CO Concentrations in Parts per Million <sup>a</sup>							
	Roadway Edge		25 feet		50 feet		100 feet	
	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour	1-Hour	8-Hour
Union and Washington – Alt. D	4.0	2.9	3.6	2.6	3.5	2.6	3.4	2.5
<i>Union and Washington – Project</i>	<i>4.2</i>	<i>3.1</i>	<i>3.8</i>	<i>2.8</i>	<i>3.7</i>	<i>2.7</i>	<i>3.5</i>	<i>2.5</i>
Figueroa and Washington - Alt. D	4.8	3.5	4.2	3.0	4.0	2.9	3.7	2.7
<i>Figueroa and Washington - Project</i>	<i>5.6</i>	<i>4.0</i>	<i>4.8</i>	<i>3.4</i>	<i>4.4</i>	<i>3.2</i>	<i>4.1</i>	<i>2.9</i>
Figueroa and 23 <sup>rd</sup> – Alt. D	4.7	3.4	4.1	3.0	3.9	2.8	3.6	2.6
<i>Figueroa and 23<sup>rd</sup> – Project</i>	<i>4.9</i>	<i>3.6</i>	<i>4.3</i>	<i>3.1</i>	<i>4.0</i>	<i>2.9</i>	<i>3.7</i>	<i>2.7</i>
<sup>a</sup> The federal 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm. National and state 8-hour standards are 9.0 parts per million.								
<i>Source: CAJA Environmental Services, 2012. Calculation sheets are included in Appendix VI.</i>								

## Cultural Resources

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. Overall, Alternative D would include development of less square footage than the Project. Similar to the Project, all of the development under Alternative D would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*. This EIR concluded that the design of the Project would effectively conform to the letter and spirit of the *University Park HPOZ Preservation Plan Design Guidelines through the design review and approval process*, and impacts to the University Park HPOZ would be less than significant. Because Alternative D would include less development than under the Project and would comply with all applicable design

standards, impacts related to the University Park HPOZ would be less than significant under Alternative D, similar to the Project.

### **Greenhouse Gas Emissions**

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. As discussed in Section IV.E (Greenhouse Gas Emissions), the Project would generate a net increase of 1,413.95 metric tons of CO<sub>2</sub>e per year with implementation of various GHG reduction measures. The Project's net increase in GHGs would not be considered a cumulatively considerable contribution to statewide GHG emissions and the potential effects climate change. As such, the Project would not have the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant. Because Alternative D would include construction and operation of less development than the Project, the amount of GHG emissions generated under Alternative D would be less than the Project, and impacts related to GHG emissions under this alternative would be less than significant, similar to the Project.

### **Hydrology and Water Quality**

Similar to the Project, a SUSMP would be required in accordance with the NPDES General Permit under Alternative D. The SUSMP would detail the treatment measures and BMPs to control pollutants and would include an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. Preparation and implementation of the SUSMP would ensure that water quality impacts under Alternative D would be minimized and that the alternative would not violate any water quality standards. Therefore, similar to the Project, water quality impacts under Alternative D would be less than significant.

### **Land Use and Planning**

Alternative D includes rezoning the Project site to C2, demolishing and removing the existing catering building from the site, and developing the site with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. This alternative would be allowed under the existing land use designation for the site, and as such, would likely be consistent with the policies of the City's *General Plan* and the *South Los Angeles Community Plan*. By providing employment near major roadways, transit, and residential land uses, Alternative D would be consistent with policies of the *Regional Comprehensive Plan and Guide*, *Compass 2% Strategy Plan*, and *Regional Transportation Plan*. Also, as stated previously, all of the development under Alternative D would occur in accordance with the applicable design standards, such as those in the *South Los Angeles Community Plan*, *Walkability Checklist*, and *University Park HPOZ Preservation Plan Guidelines*, and with the LAMC lighting

requirements. Thus, similar to the Project, impacts related to land use and planning under Alternative D would be less than significant.

## Noise

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. Overall, Alternative D would include development of less square footage than the Project. This EIR concluded that construction-related noise levels under the Project would exceed the City's threshold, and the impact would be significant and unavoidable. Alternative D would also generate similar noise levels during construction that would exceed the City's threshold. Thus, construction-related noise impacts under Alternative D would be significant and unavoidable as well. Alternative D includes rooftop HVAC equipment and subterranean parking, similar to the Project. This EIR concluded that Project noise impacts related to HVAC equipment and subterranean parking would be less than significant. Thus, these noise impacts under Alternative D would also be less than significant. Alternative D would generate approximately 304 percent more daily traffic trips (refer to Table VI-15). Table IV.H-12 in Section IV.H (Noise) shows that the greatest increase in traffic noise associated with the Project would be 0.1 dBA along 23<sup>rd</sup> Street between Toberman Street and Oak Street. The increase in traffic associated with Alternative D would increase traffic noise levels along this roadway by less than 1.0 dBA, which is well below the significance threshold of 5.0 dBA. Thus, similar to the Project, traffic noise impacts of Alternative D would be less than significant.

## Population and Housing

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. Alternative D would generate approximately 426 employees.<sup>3</sup> As discussed in Section IV.I (Population and Housing), the Project's development of 144 dwelling units and generation of approximately 497 residents would be within SCAG's employment projections for the City and the Community Plan area, and would not result in substantial, unplanned population growth; associated impacts were found to be less than significant. Alternative D would not develop any residents or generate any residential population. Also, the type of employment associated with Alternative D (retail and office jobs) likely could be filled by people in the existing region and

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<sup>3</sup> Office Employees:  $100,375 \text{ sf} / 1,000 \text{ sf} \times 3.4965 \text{ employees per sf} = 351 \text{ employees}$ . Retail Employees:  $33,450 \text{ sf} / 1,000 \text{ sf} \times 2.2371 \text{ employees per sf} = 75 \text{ employees}$ .  $351 \text{ employees} + 75 \text{ employees} = 426 \text{ employees}$ . Employee Generation Rate Source: Los Angeles Unified School District, School Fee Justification Studies for Los Angeles Unified School District, Table ES-1, September 2002

would not cause people to move from outside of the region to fill employment positions. For these reasons, this alternative also would not cause substantial, unplanned population growth, and no significant impacts would occur, similar to the Project.

### **Public Services**

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. Overall, Alternative D would include development of less square footage than the Project. The analysis in this EIR concluded that Project impacts related to public services would be less than significant, and the Project's contribution to library services would be less than significant with mitigation. Alternative D does not include development of any residential land uses and would generate virtually no demand for school, recreational, and library services, and because retail/office uses typically do not operate 24 hours per day, the demand for fire and police services is generally less, as well. Thus, this alternative would have less demand for public services than the Project, and impacts related to public services would be less than significant.

### **Traffic/Transportation**

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site. This EIR concluded that proposed Project impacts related to the following traffic issues would be less than significant: intersection capacity; neighborhood intrusion; bicycle, pedestrian, and vehicular safety (with mitigation); transit; in-street construction; and parking.

As shown on Table VI-15, Alternative D would result in 989 more daily traffic trips than the Project, 110 more morning peak-hour trips, and 138 more afternoon peak-hour trips. The traffic analysis prepared for the Project concluded that the Project would not result in any significant LOS impacts. As shown on Table VI-16, Alternative D would not result in any significant impacts under the Existing-With-Alternative D traffic scenario, similar to the Project. However, as shown on Table VI-17, Alternative D would result in a significant impact during the afternoon peak hour at the intersection of Figueroa Street and Washington Boulevard under the Future-With-Alternative D traffic scenario. In order to mitigate the impact to less than significant, Alternative D would need to incorporate a TDM plan to reduce the afternoon peak-hour trip generation.



**Table VI-15**  
**Alternative D Trip Generation**

Use	Size	Daily Trips	AM Peak Hour	PM Peak Hour
Retail <sup>1</sup>	33,450 sf	1,436	34	125
Less 50% Pass-by Trips		(718)	(18)	(63)
Office <sup>2</sup>	100,375 sf	1,105	156	150
Total Alternative D Traffic		1,823	172	212
Less Existing Traffic		(350)	(35)	(23)
<b>Net Alternative D Traffic</b>		<b>1,473</b>	<b>137</b>	<b>189</b>
<b>Net Project Traffic</b>		<b>484</b>	<b>27</b>	<b>51</b>

*du = dwelling unit      gsf = gross square feet*  
<sup>1</sup> ITE Land Use Code 820 (Shopping Center) trip generation average rates  
 - Daily Trip Rate: 42.94 trips/1,000 sf (50% inbound/50% outbound)  
 - AM Peak-Hour Trip Rate: 1.03 trips/1,000 sf (61% inbound/39% outbound)  
 - PM Peak-Hour Trip Rate: 3.75 trips/1,000 sf (48% inbound/52% outbound)  
<sup>2</sup> ITE Land Use Code 710 (General Office Building) trip generation average rates.  
 - Daily Trip Rate: 11.01 trips/1,000 sf (50% inbound/50% outbound)  
 - AM Peak-Hour Trip Rate: 1.55 trips/1,000 sf (88% inbound/12% outbound)  
 - PM Peak-Hour Trip Rate: 1.49 trips/1,000 sf (17% inbound/83% outbound)

**Table VI-16**  
**Existing-With-Alternative D – LOS**

No.	Intersection	Peak Hour	Existing		Existing With Alternative D		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1	Union Ave/ Washington Ave	AM	0.689	B	0.703	C	0.014	NO
		PM	0.649	B	0.660	B	0.011	NO
2	Union Ave/ 23 <sup>rd</sup> St	AM	0.529	A	0.545	A	0.016	NO
		PM	0.510	A	0.537	A	0.027	NO
3	Toberman St/ 18 <sup>th</sup> St-Harbor Freeway SB Off-Ramp	AM	0.119	A	0.125	A	0.006	NO
		PM	0.072	A	0.073	A	0.001	NO
4	Harbor Freeway SB On-Ramp/ Washington Blvd	AM	0.472	A	0.471	A	-0.001	NO
		PM	0.583	A	0.593	A	0.010	NO
5	Oak St/ Washington Blvd	AM	0.314	A	0.360	A	0.046	NO
		PM	0.271	A	0.354	A	0.083	NO
6	Oak St-Scarff St/ 23 <sup>rd</sup> St	AM	0.282	A	0.318	A	0.036	NO
		PM	0.257	A	0.300	A	0.043	NO
7	Figueroa St/ Washington Blvd	AM	0.717	C	0.717	C	0.000	NO
		PM	0.713	C	0.724	C	0.011	NO
8	Figueroa St/ 23 <sup>rd</sup> St	AM	0.540	A	0.559	A	0.019	NO
		PM	0.608	B	0.619	B	0.011	NO

Source: LLG, 2012.

**Table VI-17  
Future-With-Alternative D – LOS**

No.	Intersection	Peak Hour	Future Without Alternative D		Future With Alternative D		Change in V/C	Signif. Impact?
			V/C	LOS	V/C	LOS		
1	Union Ave/ Washington Ave	AM	0.770	C	0.784	C	0.014	NO
		PM	0.759	C	0.770	C	0.011	NO
2	Union Ave/ 23 <sup>rd</sup> St	AM	0.581	A	0.598	A	0.017	NO
		PM	0.591	A	0.618	B	0.027	NO
3	Toberman St/ 18 <sup>th</sup> St-Harbor Freeway SB Off-Ramp	AM	0.127	A	0.133	A	0.006	NO
		PM	0.079	A	0.080	A	0.001	NO
4	Harbor Freeway SB On-Ramp/ Washington Blvd	AM	0.543	A	0.542	A	-0.001	NO
		PM	0.668	B	0.678	B	0.010	NO
5	Oak St/ Washington Blvd	AM	0.337	A	0.382	A	0.045	NO
		PM	0.300	A	0.383	A	0.083	NO
6	Oak St-Scarff St/ 23 <sup>rd</sup> St	AM	0.289	A	0.325	A	0.036	NO
		PM	0.261	A	0.305	A	0.044	NO
7	Figuera St/ Washington Blvd	AM	0.914	E	0.912	E	-0.002	NO
		PM	0.990	E	1.018	F	0.028	YES
8	Figueroa St/ 23 <sup>rd</sup> St	AM	0.654	B	0.674	B	0.020	NO
		PM	0.869	D	0.881	D	0.012	NO
Source: LLG, 2012.								

This EIR concluded that the Project's generation of transit trips (2 AM peak-hour trips, 3 PM peak-hour trips, and 24 daily trips) would not result in any significant impacts. Alternative D would generate approximately 5 AM peak-hour transit trips, 7 PM peak-hour transit trips, and 48 daily transit trips. As discussed in Section IV.K (Transportation/Traffic), the three transit lines serving the Project area provide service for an average of (i.e., average of the directional number of buses during the peak hours) 31 buses during the morning peak hour and 30 buses during the afternoon peak hour. It is anticipated that the existing transit service in the Project area could adequately accommodate transit trips generated by Alternative D. Also, given the low number of transit trips per bus and based on the calculated number of generated transit trips, no impacts on existing or future transit services in the Project area would occur as a result of Alternative D, similar to the Project.

Construction activities and the amount of construction equipment that would be used for Alternative D would be similar to that under the proposed Project (although, possibly somewhat less due to the reduction in the overall amount of development), and the types of construction-related traffic impacts that would occur under this alternative would be similar to those identified for the proposed Project. Thus, impacts related to in-street construction under Alternative D would also be less than significant with mitigation.

The number of parking spaces provided under Alternative D would comply with LAMC parking requirements, and no significant impacts would occur, similar to the proposed Project.

## Utilities

Under Alternative D, the existing catering building would be demolished and removed from the Project site, and the site would be developed with a four-story/55-foot, 133,825-square-foot retail/office structure over two levels of subterranean parking on the northern and central portions of the Project site and a surface parking lot on the southern portion of the site.

### Wastewater

The proposed Project would generate approximately 24,785 gallons of wastewater per day. The analysis in this EIR concluded that Project impacts related to wastewater supply would be less than significant. As shown on Table VI-18, Alternative D would generate less wastewater than the Project. Therefore, impacts related to wastewater service under Alternative D would also be less than significant.

**Table VI-18**  
**Estimated Net Wastewater Generation of Alternative D**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (gpd)
Retail	33,450 sf	80 gpd/1,000 sf	2,676
Office	100,375 sf	150 gpd/1,000 sf	15,056
<b>Subtotal Generation</b>			<b>17,732</b>
<i>Less Existing Consumption</i>			<i>1,399</i>
<b>Total Net Consumption</b>			<b>16,333</b>
gpd = gallons per day      du = dwelling unit      sf = square feet			
<sup>a</sup> City of Los Angeles Bureau of Sanitation, Sewer Generation Rates, March 27, 2009. Water consumption is assumed to be approximately 120 percent of wastewater generation.			
<sup>b</sup> All units are assumed as two-bedroom units.			

### Water

The proposed Project would consume approximately 29,743 gallons of water per day. The analysis in this EIR concluded that Project impacts related to water service would be less than significant. As shown on Table VI-19, Alternative D would consume less water than the Project. Therefore, impacts related to water service under Alternative D would be less than significant, similar to the Project.

### Solid Waste

The proposed Project would generate approximately 3,248 tons of solid waste during the demolition/construction phase and 0.09 ton of solid waste per day during the Project's operational phase. The analysis in this EIR concluded that Project impacts related to solid waste would be less than significant. As shown on Tables VI-20 and VI-21, Alternative D would generate more solid waste during the demolition/construction and the operational phases than the Project. However, the landfills serving the Alternative D would have adequate capacity to serve the alternative. Therefore, impacts related to solid waste under Alternative D would be less than significant, similar to the Project.

**Table VI-19**  
**Estimated Net Water Consumption of Alternative D**

Land Use	Size	Consumption Rate <sup>a</sup>	Consumption (gpd)
Retail	33,450 sf	92 gpd/1,000 sf	3,077
Office	100,375 sf	168 gpd/1,000 sf	16,863
<b>Subtotal Consumption</b>			<b>19,940</b>
<i>Less Existing Consumption</i>			<i>1,678</i>
<b>Total Net Consumption</b>			<b>18,262</b>
<i>gpd = gallons per day      du = dwelling unit      sf = square feet</i> <sup>a</sup> City of Los Angeles Bureau of Sanitation, Sewer Generation Rates, March 27, 2009. Water consumption is assumed to be approximately 120 percent of wastewater generation. <sup>b</sup> All units are assumed as two-bedroom units.			

**Table VI-20**  
**Approximate Demolition and Construction Waste Generation for Alternative D**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (tons)
<b>Demolition</b>			
Non-residential	32,930 sf	173 lbs/sf	2,848
<b>Construction</b>			
Non-residential	133,825 sf	1.95 lbs/sf	130
<b>Total Generation</b>			<b>2,978</b>
<i>lbs = pounds      sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.			

**Table VI-21**  
**Estimated Net Solid Waste Generation of Alternative D**

Land Use	Size	Generation Rate <sup>a</sup>	Generation (tpd)
Retail	33,450 sf	0.000003 tpd/sf	0.1
Office	100,375 sf	0.000002 tpd/sf	0.2
<b>Subtotal Generation</b>			<b>0.3</b>
<i>Less Existing Generation</i>			<i>0.19</i>
<b>Total Net Generation</b>			<b>0.11</b>
<i>du = dwelling unit      sf = square feet      tpd = tons per day</i> <sup>a</sup> Source: California Integrated Waste Management Board website: <a href="http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm">http://ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm</a> , July 10, 2009			

### Electricity

The proposed Project would consume approximately 631,824 kilowatt hours (kWH) of electricity per year. The analysis in this EIR concluded that Project impacts related to electricity supply would be less than significant. As shown on Table VI-22, Alternative D would consume more electricity than the

proposed Project. However, the amount of electricity needed for Alternative D could also be provided by DWP and would not require development of additional sources of energy. Therefore, impacts related to electricity under Alternative D would be less than significant, similar to the proposed Project.

**Table VI-22**  
**Estimated Net Electricity Consumption of Alternative D**

Land Use	Size	Consumption Rate (kWH/year) <sup>a</sup>	Consumption (kWH/year)
Retail	33,450 sf	13.55/sf	453,248
Office	100,375 sf	12.95/sf	1,299,856
<b>Subtotal Consumption</b>			<b>1,753,104</b>
<i>Less Existing Consumption</i>			<i>167,139</i>
<b>Total Net Consumption</b>			<b>1,585,965</b>
<i>kWH = kilowatt hours      du = dwelling unit      sf = square feet</i> <sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

#### *Natural Gas*

The proposed Project would consume approximately 247,847 cubic feet of natural gas per day. The analysis in this EIR concluded that Project impacts related to natural gas supply would be less than significant. As shown on Table VI-23, Alternative D would consume more natural gas than the proposed Project. However, the amount of natural gas needed for Alternative D could also be provided by Southern California Gas (SCG) and would not require development of additional sources of energy. Therefore, impacts related to natural gas under Alternative D would be less than significant, similar to the proposed Project.

**Table VI-23**  
**Estimated Net Natural Gas Consumption of Alternative D**

Land Use	Size	Consumption Rate (CF/month) <sup>a</sup>	Consumption (CF/month)
Retail	33,450 sf	3.0/sf	100,350
Office	100,375 sf	2.0/sf	200,750
<b>Subtotal Consumption</b>			<b>301,100</b>
<i>Less Existing Consumption</i>			<i>37,005</i>
<b>Total Net Consumption</b>			<b>338,105</b>
<i>CF = cubic feet      du = dwelling unit      sf = square feet</i> <sup>a</sup> SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

**Relationship of Alternative D to the Project Objectives**

Alternative D would meet the following Project objectives:

2. To provide a development that is compatible and complementary with surrounding land uses.
3. To provide adequate parking facilities to serve the proposed development residents and guests.
4. To mitigate, to the extent feasible, the potential environmental impacts of the Proposed Project.
5. To provide development that is financially viable.

Alternative B would not meet the following Project objectives:

1. To provide infill housing development, including very low-income units, to serve the local community.
6. To provide a mix of housing options combining multi-family development with townhome units.

**ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

CEQA requires that an EIR alternatives analysis include designation of an “environmentally superior” alternative. Based on the analysis presented in this section, Alternative A: No Project Alternative would result in the greatest reduction in Project impacts and would be the environmentally superior alternative. However, CEQA requires that if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives (*CEQA Guidelines*, Section 15126.6[e][2]). As stated at the beginning of this section, the significant impacts of the proposed Project include those associated with construction-related noise (which would be significant and unavoidable) and library services (which could be reduced to less-than-significant impacts with mitigation). The construction-related noise impact likely would occur under any reasonable development scenario for the Project site, because of the amount of demolition/construction involved, including that which would occur under Alternatives B, C and D. Also, the less-than-significant impact (with mitigation) related to bicycle, pedestrian, and vehicle safety identified for the Project would occur under any development scenario for the Project site due to the site’s proximity to the Norwood Elementary School. Further, the less-than-significant impact (with mitigation) to library services identified for the Project is an impact noted by the City’s Public Library for all proposed development in the City that includes residential land uses. Thus, this impact would occur under Alternatives B and C, as well. Unlike the proposed Project, Alternatives C and D would result in significant and unavoidable impacts related to localized operational emissions, and significant impacts related to intersection LOS. The significance of all impacts under Alternative B would be similar to the proposed Project, but because this alternative includes less overall development than the Project, impacts under Alternative B would occur to a lesser degree. Therefore, Alternative B was selected as the environmentally superior alternative.

**Table VI-24**  
**Comparison of the Impacts under the Project to the Impacts under the Alternatives**

Environmental Issues Analyzed in the EIR	Project Impacts	Impacts under the Alternatives			
		Alternative A: No Project	Alternative B: Reduced Density	Alternative C: Alternative Land Use Mix	Alternative D: Retail/Office
<b>Aesthetics</b>					
Scenic Vistas	LTS	LTS	LTS	LTS	LTS
Scenic Resources	LTS	LTS	LTS	LTS	LTS
Visual Character	LTS	LTS	LTS	LTS	LTS
Light and Glare	LTS	LTS	LTS	LTS	LTS
<b>Air Quality</b>					
AQMP Consistency	LTS	LTS	LTS	LTS	LTS
Construction Emissions					
Regional Air Quality	SU	LTS	LTS	LTS	LTS
Local Air Quality	LTS	LTS	LTS	LTS	LTS
Operational Impacts					
Regional Air Quality	LTS	LTS	LTS	LTS	LTS
Local Air Quality	LTS	LTS	LTS	SU	SU
CO Hot Spots	LTS	LTS	LTS	LTS	LTS
Toxic Air Contaminants	LTS	LTS	LTS	LTS	LTS
<b>Cultural Resources</b>					
Historical Resources	LTS	LTS	LTS	LTS	LTS
<b>Greenhouse Gas Emissions</b>	LTS	LTS	LTS	LTS	LTS
<b>Hydrology &amp; Water Quality</b>					
Water Quality	LTS	LTS	LTS	LTS	LTS
<b>Land Use &amp; Planning</b>					
Policy Consistency	LTS	LTS	LTS	LTS	LTS
<b>Noise</b>					
Temporary or Periodic Noise Increase	SU	LTS	SU	SU	SU
Construction-Related Groundborne Vibration	LTS	LTS	LTS	LTS	LTS
Exposure of On-Site Occupants to Noise	LTS	LTS	LTS	LTS	LTS
Permanent Increase in Noise					
On-Site	LTS	LTS	LTS	LTS	LTS
Traffic	LTS	LTS	LTS	LTS	LTS
<b>Public Services</b>					

**Table VI-24**  
**Comparison of the Impacts under the Project to the Impacts under the Alternatives**

Environmental Issues Analyzed in the EIR	Project Impacts	Impacts under the Alternatives			
		Alternative A: No Project	Alternative B: Reduced Density	Alternative C: Alternative Land Use Mix	Alternative D: Retail/Office
Fire Service	LTS	LTS	LTS	LTS	LTS
Police Service	LTS	LTS	LTS	LTS	LTS
School Service	LTS	LTS	LTS	LTS	LTS
Parks & Recreational Service	LTS	LTS	LTS	LTS	LTS
Library Service	LTS w/M	LTS	LTS w/M	LTS w/M	LTS
<b>Transportation/Traffic</b>					
Intersection Capacity	LTS	LTS	LTS	LTS	LTS w/M
Transit	LTS	LTS	LTS	LTS	LTS
Neighborhood Intrusion	LTS	LTS	LTS	LTS	LTS
Project Access					
Bicycle, Pedestrian, & Vehicular Safety	LTS w/M	LTS	LTS w/M	LTS w/M	LTS w/M
Parking	LTS	LTS	LTS	LTS	LTS
In-Street Construction	LTS	LTS	LTS	LTS	LTS
<b>Utilities</b>					
Water	LTS	LTS	LTS	LTS	LTS
Wastewater	LTS	LTS	LTS	LTS	LTS
Solid Waste	LTS	LTS	LTS	LTS	LTS
Electricity	LTS	LTS	LTS	LTS	LTS
Natural Gas	LTS	LTS	LTS	LTS	LTS
<i>LTS = Less Than Significant Impact</i> <i>LTS w/M = Less-Than-Significant-Impact-With-Mitigation</i> <i>SU = Significant Unavoidable Impact</i>					



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## **VII. PREPARERS OF THE EIR**

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## VIII. ACRONYMS AND ABBREVIATIONS

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AB	Assembly Bill
ACM	asbestos containing material
AEP	Association of Environmental Professionals
ALS	Advanced life support
ANSI	American National Standard Institute
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
bcf	billion cubic feet
BLS	basic life support
BMP	Best Management Practices
BTU	British Thermal Units
CAA	Clean Air Act
CBC	California Building Code
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CAAQS	California Ambient Air Quality Standards
CA FID	California Facility Inventory Database
CA H2	California Hydrogen Highway Network
CALTRANS	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFL	compact fluorescent light
CFR	Code of Federal Regulations
CH <sub>4</sub>	methane
CHAS	Comprehensive Housing Affordability Study
CHMIRS	California Hazardous Materials Incident Report System
CII	Commercial/Industrial/Institutional
CIWMB	California Integrated Waste Management Board
CMA	Critical Movement Analysis
CMP	Comprehensive Management Plan
CMP	Congestion Management Program
CNEL	Community Noise Exposure
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalencies

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COHb	carboxyhemoglobin
CORRACTIS	Corrective Action Sites
CPA	Community Plan Area
CSSA	Collection System Settlement Agreement
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel scale
DHS	Department of Health Services
DSM	Demand Side Management
DU	Dwelling Unit
DWR	Department of Water Resources
EIR	Environmental Impact Report
EMS	emergency medical service
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FAR	floor area ratio
FHWA	Federal Highway Administration
ft	feet
FPPP	Fire Protection and Prevention Plan
FTA	Federal Transit Administration
GBCI	Green Building Certification Institute
GCASWP	General Construction Activity Storm Water Permit
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GSF	gross square feet
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HOV	High Occupancy Vehicle
HPOZ	Historic Preservation Overlay Zone
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HUD	Housing and Urban Development
HWIS	Hazardous Waste Information System
I-5	Golden State Freeway
I-10	Santa Monica Freeway
I-105	Glen Anderson Freeway
I-110	Harbor Freeway
IRP	Integrated Resources Plan
ITS	Intelligent Transportation System
L <sub>eq</sub>	equivalent noise level

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L <sub>max</sub>	maximum instantaneous noise level
L <sub>min</sub>	minimum instantaneous noise level
LAAFP	Los Angeles Aqueduct Filtration Plant
LABS	Los Angeles Bureau of Sanitation
LACC	Los Angeles County Code
LACMTA	Los Angeles County Metropolitan Transit Authority
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LBP	lead-based paints
Lbs	pounds
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
Low-E	Low Emissivity
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
MEP	Maximum Extent Practicable
mgd	million gallons daily
MPP	Manual of Policies and Procedures
MS4	Municipally-owned Separate Storm Sewer Systems
msl	mean sea level
MUTCD	Manual on Uniform Traffic Control Devices
mW	megawatts
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NB	Northbound
NESHAP`	National Emission Standard for Hazardous Air Pollutants
N <sub>2</sub> O	nitrous oxide
NO	nitric oxide
NO <sub>2</sub>	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List



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NRCS	Natural Resources Conservation Service
O <sub>3</sub>	ozone
OAL	Office of Administrative Law
OHP	Office of Historic Preservation
OHR	Office of Historic Resources
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyls
PFC	perfluorocarbons
PM <sub>2.5</sub>	fine particulate matter
PM <sub>10</sub>	respirable particulate matter
ppd	pollutant pounds per day
ppm	parts per million
PPV	Peak Particle Velocity
psi	pounds per square inch
PUC	Public Utilities Commission
RCPG	Regional Comprehensive Plan and Guide
REC	Recognized Environmental Condition
RMS	root mean square
RPS	Renewable Portfolio Standard
ROG	Reactive Organic Gas
RODS	Record of Decision
ROWD	Report of Water Discharge
RWQCB	Regional Water Quality Control Board
SB	Southbound
SB 50	Leory F. Greene School Facilities Act of 1998
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SDWA	Safe Drinking Water Act
sec	second
sf	square feet
SF <sub>6</sub>	sulfur hexafluoride
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SOON	Surplus Off-road Opt-In
SoCal Gas	Southern California Gas Company
SQMP	Storm water Quality Management Plan
SRA 1	Central Los Angeles area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Stormwater Mitigation Plan

SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TAP	Technical Assistance Program
TIA	Traffic Impact Analysis
TRU	Transportation Refrigeration Units
TSD	Treatment, Storage, Disposal
UBC	Uniform Building Code
ULSD	Ultra Low Sulfur Diesel
U.S. EPA	United States Environmental Protection Agency
UST	underground storage tank
UWMP	Urban Water Management Plan
v/c	Volume-to-capacity
VdB	Velocity in decibels
WFP	Wastewater Facilities Plan
µg/m <sup>3</sup>	micrograms per cubic meter

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