

**Addendum #1 to the Final Environmental Impact Report for the
2017 San Pedro Community Plan Update**
Environmental Case: ENV-2009-1558-EIR
State Clearinghouse No.: SCH No. 2008021004

Project Location: 642 S. Palos Verdes Street, 145-175 W. 6th Street, 150 W. 7th Street, 625 S. Beacon Street, Los Angeles, CA, 90731

Community Plan Area: San Pedro

Council District: 15—Buscaino

Project Description: The Project Site is comprised of a city block bounded on the north by 6th Street, on the south by 7th Street, on the west by Palos Verdes Street, and on the east by Beacon Street, in the San Pedro Community Plan Area of the City of Los Angeles. The Project Site is designated as Regional Commercial under the General Plan. The Project Site is zoned C2-2D-CPIO. The Project Site contains 3 buildings (a 17,000 square foot medical office building, a 7,917 square foot restaurant building, and a 5,105 square foot general office/commercial building) and a surface parking lot. All existing buildings would be demolished. The Project would remove all 47 onsite trees, as they would be within the zone of construction. The Project would also remove the 27 street trees and replace with 40 street trees. The Project is an infill mixed-use development with 281 residential multi-family dwelling units (83 studio, 101 1-bedroom units, 84 2-bedroom units, and 13 3-bedroom units) and 2,316 square feet of ground floor retail in a new 8-story building with 3 subterranean parking levels. The amount of materials exported is anticipated to be approximately 68,500 cubic yards. The Project is consistent with the Community Plan (most recently updated in 2017), the zoning designation for the Project site and the San Pedro Community Plan Implementation Overlay (CPIO) District. The Applicant requests the following discretionary actions: (1) Pursuant to LAMC Section 16.05, Site Plan Review for a development project that results in an increase of 50 or more dwelling units and/or guest rooms; (2) Pursuant LAMC Section 12.37.I, Waiver of Dedication and/or Improvement to the public right of way along Palos Verdes Street, 6th Street and Beacon Street, adjacent to the Project Site. The requested waiver of dedication along Palos Verdes Street, 6th Street and Beacon Street is to allow wider sidewalks and pedestrian amenities consistent with recent Community Redevelopment Agency Streetscape plans for adjacent streets. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route permit, foundation permits, building permits, and sign permits, including approval of a CPIO Administrative Clearance and other discretionary and ministerial permits and approvals that may be deemed necessary. All applicable mitigation measures, regulatory measures, and conditions of approval required by the certified Final Environmental Impact Report for the 2017 Community Plan Update (ENV-2009-1558-EIR) (Certified EIR) will be applied to the Project.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC
15350 Sherman Way, Suite 315,
Van Nuys, CA 91406

APPLICANT:

HPG Beacon, LLC
5000 E. Spring Street, Suite 500,
Long Beach, CA 90815

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ADDENDUM TO THE EIR

1 Introduction

Project Title: Addendum #1 to the Final Environmental Impact Report for the 2017 San Pedro Community Plan Update

Environmental No.: ENV-2009-1558-EIR

State Clearinghouse: 2008021004

Project Location: 642 S. Palos Verdes Street. 145-175 W. 6th Street, 150 W. 7th Street, 625 S. Beacon Street, Los Angeles, CA, 90731 (Project Site or Site)

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 621, Los Angeles, CA 90012
Jeanalee Obergfell
(213) 978-0092 and jeanalee.obergfell@lacity.org

Applicant: HPG Beacon, LLC
5000 E. Spring Street, Suite 500, Long Beach, CA 90815

Prepared By: CAJA Environmental Services, LLC
15350 Sherman Way, Suite 315, Van Nuys, CA 91406
Seth Wulkan, Project Manager
310-469-6700 and Seth@ceqa-nepa.com

Pursuant to the California Environmental Quality Act (CEQA), a Final Environmental Impact Report (EIR) was prepared and certified for the 2017 San Pedro Community Plan Update (the “Approved Project”) (SCH No. 2008021004). The Final EIR document is hereinafter referred to as the “Certified EIR.” The Certified EIR consists of a Program EIR.

The San Pedro Community Plan Area (CPA) contains approximately 3,674 acres and is situated in the southern portion of the City of Los Angeles. The CPA is geographically located on the Palos Verdes peninsula at the southern terminus of the Harbor Freeway (I-110), and is adjacent to the Wilmington-Harbor City Community Plan Area. The CPA is also located adjacent to the Port of Los Angeles, the Pacific Ocean, and the City of Rancho Palos Verdes. The CPA is generally bounded by: Taper Avenue on the north; John S. Gibson Boulevard, Harbor Boulevard, the West Channel of the Port of Los Angeles, and Cabrillo Beach on the east; the Pacific Ocean on the south; and the western border of Los Angeles with the City of Rancho Palos Verdes.

The Approved Project:

- Updated the existing 1999 San Pedro Community Plan (Policy Document), which will guide development in this Community Plan Area (“Community Plan Update”);

- Updated General Plan land use designations and corresponding zones (also referred to as the “Plan Map”), including map footnotes and symbol changes;
- Amended the applicable Circulation Element (Mobility Plan 2035) of the General Plan as necessary for consistency with the Community Plan Update;
- Adopted zone and height district changes necessary to implement the Community Plan Update;
- Repealed the Downtown San Pedro Community Design Overlay ordinance (Ordinance No. 179,935); and
- Adopted the San Pedro Community Plan Implementation Overlay (CPIO) District to implement the Community Plan Update.

Relationship Of The Proposed Project To The Approved Project

The Approved Project is the updated Community Plan. The proposed Project (the “Project”) is an infill mixed-use development that implements the Approved Project by developing the Project site in a manner consistent with the updated Community Plan, the zoning designation for Project site and the San Pedro Community Plan Implementation Overlay (CPIO) District. The Project will consist of 281 residential multi-family dwelling units and 2,316 square feet of ground floor retail in a new 8-story building with 3 subterranean parking levels.

1.2 The Certified EIR

In connection with the Approved Project, an EIR was certified on October 4, 2017, to assess its potential environmental effects and propose mitigation measures, as needed. The Approved Project included new policies and programs, as well as zone changes, General Plan land use designation changes, district amendments, and established overlay zones. The zoning designations would serve to regulate development standards such as: heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design.

Statement of Overriding Consideration

The Final EIR indicated that potentially significant and unavoidable impacts attributed to the Approved Project are limited to aesthetics, air quality, greenhouse gas emissions, hydrology/water quality, noise, transportation, and utilities/service systems and a Statement of Overriding Considerations was adopted by the City Council in connection with its certification of the Final EIR and approval of the Approved Project.

1.2.1 Community Plan Implementation Overlay

The Community Plan Implementation Overlay (CPIO) District was established to regulate development that is consistent with the General Plan, to enhance the unique character of neighborhoods, and to address growth within the CPA. While the policies and programs contained within the Community Plan apply throughout the CPA, only certain portions of the

CPA were proposed to undergo zoning and land use changes. The change areas were classified into different types: CPIO District subareas and Specific Plan Amendment change areas, nomenclature change areas, and zone changes to establish consistency. The nomenclature change areas were changes in name only; densities, heights, and land uses did not change in these areas as a result of the Approved Project. Other zone change adjustments simply maintained consistency between existing land uses and the General Plan.

The San Pedro CPIO District is the implementing ordinance of the San Pedro Community Plan. The intent of the San Pedro CPIO District is to preserve and strengthen the appearance, vitality, and compatibility of San Pedro's commercial, industrial, and multi-family residential areas. It provides use and design standards to shape new development and improvements to existing properties. The San Pedro CPIO District incorporates the Downtown San Pedro Community Design Overlay guidelines to further shape future development.

As described in Section 1-8 of the San Pedro CPIO District, these Environmental Standards Procedures are included to implement the Mitigation & Monitoring Program included as part of the San Pedro Community Plan Update and reviewed in the San Pedro Community Plan Environmental Impact Report (No. ENV-2009-1558-EIR), certified on October 4, 2017 (San Pedro EIR). As described in CPIO Appendix A, some mitigation measures were implemented through Supplemental Development Standards. In addition to Projects in Subareas that are required to comply with these Environmental Standards, any other discretionary project in the boundaries of the San Pedro Community Plan Area that seeks to rely on the San Pedro EIR for its CEQA clearance (including through tiering, preparing an addendum, supplemental EIR, or a statutory infill exemption), may incorporate or impose the following Environmental Standards on Project (and any Supplemental Development Standard identified as a San Pedro EIR mitigation measure).

In addition to policies addressing the distribution of land uses and building intensity, the New Community Plan also addressed mobility, historic preservation, urban design, provisions for public infrastructure, public safety, and healthy and sustainable communities.

1.3 Project

1.3.1 Project Setting

Project Site is comprised of a city block bounded on the north by 6th Street, on the south by 7th Street, on the west by Palos Verdes Street, and on the east by Beacon Street, in the San Pedro Community Plan Area of the City of Los Angeles (City). The Site is 600 feet west of the San Pedro Main Channel to the Los Angeles Harbor.

See **Figure 1.3-1, Regional Map**, for the location within the context of the City.

See **Figure 1.3-2, Aerial Map**, for an aerial of the Site and the immediate surrounding area.



Legend



Project Site

Source: Google Maps 2020.

Figure 1.3-2
Aerial Map

1.3.1.1 Surrounding Land Uses

The Site's vicinity is urbanized with a mixture of housing, commercial and institutional uses nearby. The Project Site surrounding uses are as follows:

- North: 6th Street, and a mixed-use development with multi-family residential and ground floor commercial¹ that began occupancy in mid 2020 (550 Palos Verdes). This area is zoned C2-2D-CPIO.
- South: 7th Street, and a surface parking lot. This area is zoned C2-2D-CPIO.
- East: Beacon Street, and San Pedro Plaza Park and a 7-story government building that supports the Los Angeles Fire Department, Los Angeles Public Works Department, and other San Pedro government offices (638 Beacon). This area is zoned C2-2D-CPIO.
- West: Palos Verdes Street, and a 10-story hotel building (601 Palos Verdes). This area is zoned C2-2D-CPIO.

1.3.1.2 Regional and Local Access

Regional access is provided by the Harbor Freeway (I-110) 1 mile northwest of the Site.

Local access is provided by:

- 6th Street (Local Street – Standard in the Mobility Plan 2035)
- Palos Verdes Street (Local Street – Standard)
- 7th Street (Avenue II)
- Beacon Street (Local Street – Standard)
- Harbor Boulevard (Avenue I).

1.3.1.3 Bicycle Facilities

Harbor Boulevard has a dedicated bike lane. 9th Street is a bicycle-friendly street.²

1.3.1.4 Pedestrian Facilities

There are adequate sidewalks along all the Project Site's boundaries. Crosswalks are provided at all legs of the nearest signalized intersection (6th and Palos Verdes, northwest of the Site) and unsignalized intersection (7th and Beacon, southeast of the Site).

¹ <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjA2NjU30>

² Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians.

1.3.1.5 Public Transit

Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), and Palos Verdes Peninsula Transit Authority (PVPTA) provides the following services:

- 7th and Palos Verdes, southwest of the Site:
 - Metro Line 205
 - LADOT San Pedro Line
- 7th and Pacific, 2,000 feet west of the Site:
 - PVPTA Line 225
 - Metro Line 205
 - Metro Line 246
 - Metro J Line (Silver)³
 - LADOT Commuter Express Line 142
 - LADOT San Pedro Line

Given the existing transit service, sidewalks, and crosswalks in the area, the Site is an ideal location for a mixed-use development providing both housing and employment opportunities in close proximity to transit.

1.3.1.6 Planning and Zoning

The Project Site's APNs, zoning, land use designation, and lot size is listed on **Table 1-1, Project Site**. The Site is zoned C2-2D-CPIO (Commercial, Height District 2, Development limitations, with San Pedro Community Design Overlay [Regional Commercial subarea]).

The Site is located within Fire District No. 1, a Liquefaction Zone, and within a 500 Foot Park Zone (John S. Gibson Jr. Park and San Pedro Plaza Park).

The Site is also subject to the following zoning information (ZI):

- ZI-2478 San Pedro Community Plan Implementation Overlay (CPIO)
- ZI-1022 Applicability Matrix for Parcel Map/Tract Map Conditions Clearance

³ In January 2020, Metro renamed its rail line, and currently has a transitional naming system using both the letter and the color: <https://thesource.metro.net/2020/01/08/get-to-know-your-line-letters/>

- ZI-2130 Harbor Gateway State Enterprise Zone

**Table 1-1
Project Site**

Address	APN	Zone	General Plan Land Use	Size (sf)
625 S. Beacon Street 642 S Palos Verdes Street 145, 155, 165, 171, 175 W. 6th Street 150 W. 7th Street	7455-026-046	C2-2D-CPIO	Regional Commercial	56,341.7
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org , December 2020.				

1.3.1.7 Existing Conditions

The lot area is 56,341 square feet (1.293 acres).⁴ The Site contains 3 buildings (a 17,000 square foot medical office building, a 7,917 square foot restaurant building, and a 5,105 square foot general office/commercial building) and a surface parking lot.

All existing buildings would be demolished.

There are 27 street trees (8 on 6th, 7 on Beacon, 6 on 7th, and 6 on Palos Verdes) and 47 onsite trees.⁵

1.3.2 Project Description

The Project is an infill mixed-use development with 281 residential multi-family dwelling units (83 studio, 101 1-bedroom units, 84 2-bedroom units, and 13 3-bedroom units) and 2,316 square feet of ground floor retail in a new 8-story building with 3 subterranean parking levels.

The Project would include a neighborhood serving commercial retail use to front 6th Street and residential lobby to front along Beacon Street.

Commercial space would be provided at the northern portion of the building on the ground floor. Residential is proposed to be located on levels 1-8 with amenity space provided on levels 1 and 2 as well as amenity space on the 8th level sky lounge and viewing deck.

An outdoor community open space is proposed at the northeastern end of the property adjacent to the existing sidewalk. The proposed 2,316 square feet of restaurant uses along the ground level would attract pedestrian activity, which would help to activate the streets in the surrounding area.

The building will be organized as shown in **Table 1-2, Building Summary**.

⁴ Plans, MVE Architects, August 20, 2020.

⁵ City of Los Angeles Tree Evaluation, Arborgate Consulting, April 22, 2020.

**Table 1-2
Building Summary**

Level	Use	Size	Units
B3	Parking	-	-
B2	Parking	-	-
B1	Parking	-	-
1	Parking	-	-
	Lobby (Leasing and Mail)	2,256 sf	-
	Retail	2,316 sf	-
	Amenity (Fitness)	2,229 sf	-
	Open Space (Publicly Accessible)	5,000 sf	-
	Residential	-	2 units
2	Residential	-	35 units
	Amenity (Fitness)	1,893 sf	-
	Amenity (Lounge)	906 sf	-
	Pool Deck	-	-
	Courtyard	-	-
3	Residential	-	41 units
4	Residential	-	41 units
5	Residential	-	41 units
6	Residential	-	41 units
7	Residential	-	41 units
8	Residential	-	39 units
	Amenity (Sky Lounge)	1,264 sf	-
	Viewing Deck	952 sf	-
Total			281 units
Plans, MVE Architects, August 20, 2020.			

1.3.2.1 Design and Architecture

See **Appendix A** of this Addendum for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated single structure with articulation and variation consistent with applicable City design guidance. Parking spaces within the building (subterranean and ground levels) and residential units located within the building have been integrated into the overall architectural theme of the Project. Overall variation in building appearance is created with the use of various materials and massing of the podium levels, the placement of residential units above the podium and the landscaped courtyard.

The Project will be similar in size and scale to multi-story structures in the vicinity, including the 7-story government building to the east, the 10-story hotel building to the west, and the 7-story mixed-use building to the north.

1.3.2.2 Density

See **Table 1-3** for the density calculation. Pursuant to the City's General Plan and Los Angeles Municipal Code (LAMC) Sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum

residential density within the C2 (same as R5) zone is one dwelling unit for every 200 square feet of lot area. The lot area for purposes of density is 56,341 square feet (1.293 acres).

**Table 1-3
Density**

Lot Area	Rate	Allowed	Provided
56,341 sf	1 unit / 200 sf	281 units	281 units
Plans, MVE Architects, August 20, 2020.			

1.3.2.3 Floor Area

See **Table 1-4, Floor Area**, for the floor area and FAR. Height District 2D generally allows 6:1 FAR in the C2 zone. The lot area for purposes of floor area is 56,341 square feet (1.293 acres). The total floor area permitted on the Project Site could be up to 338,046 square feet. The total proposed floor area is 338,046 square feet (6:1 FAR), made up of 335,730 square feet of residential and 2,316 square feet of commercial.

**Table 1-4
Floor Area**

	Allowed	Provided
Floor Area (sf)	338,046	338,046
FAR	6:1	6:1
Plans, MVE Architects, August 20, 2020.		

1.3.2.4 Setbacks

Table 1-5, Setbacks, provides the proposed setbacks.

**Table 1-5
Setbacks**

Setbacks	Location	Provide
Front	6th	0'
Side	Beacon	0'
Side	Palos Verdes	0'
Front	7th	0'
Plans, MVE Architects, August 20, 2020.		

1.3.2.5 Height

The CPIO for Regional Commercial subarea sets a maximum building height of 250 feet.⁶

The Project proposes to be 8 stories and 85 in height (to the top of the highest parapet but may not include roof appurtenances allowed by the LAMC).

⁶ San Pedro CPIO, page 14: <https://planning.lacity.org/odocument/213bd163-9baf-45f3-aa8a-01b4a2adbb2d>

The Regional Commercial subarea allows for a maximum building height of 250 feet, minimum 14-foot ground floor height and requires a 5-foot setback of the building beyond 35 feet in height. The Project maintains compliance with 8-stories and a maximum height of 85 feet. The minimum height of the ground floor will be at least 14 feet and incorporates a 5-foot setback at a minimum height of 35 feet as a larger pedestrian scaled massing gesture and further meets the requirements found within this subarea.

1.3.2.6 Open Space and Landscaping

Table 1-6, Open Space, provides the amount of required open space under the LAMC and the open space proposed to be provided by the Project.

The Project would provide 5,000 square feet of community open space on the northeast corner of the building (6th and Beacon) per CPIO Chapter II.E.⁷

There are 27 street trees (8 on 6th, 7 on Beacon, 6 on 7th, and 6 on Palos Verdes) and 47 onsite trees.⁸ The Project would remove all 47 onsite trees, as they would be within the zone of construction. The Project would also remove the 27 street trees and replace with 40 street trees. Any tree removal will comply with the City's Tree Replacement Program (including Urban Forestry Division, Bureau of Street Services for the street trees).

Although the required landscaping is 3,897 square feet (approximately 25% of the required common open space), the Project seeks to over-landscape and provide approximately 4,423 square feet of landscaping. The Project would be required to provide at least 70 trees (1 tree per 4 units) and would provide 74 trees. The Project would comply with LAMC requirements for trees and landscaping.

**Table 1-6
Open Space**

Use	Quantity	Rate	Total (sf)
Required			
< 3 habitable rooms	184 units	100 sf / unit	18,400
= 3 habitable rooms	84 units	125 sf / unit	10,500
> 3 habitable rooms	13 units	175 sf / unit	2,275
Total Required			31,175
Total Required (Per CPIO*)			15,588
Provided			
Pool Deck and Courtyard (common and open to the sky)			6,879
Roof Terrace (common and open to the sky)			952
Amenity Room (common indoor)			3,897
Subtotal Common			11,728
Private Open Space (212 Balconies x 50 SF)			10,600

⁷ San Pedro CPIO: <https://planning.lacity.org/odocument/213bd163-9baf-45f3-aa8a-01b4a2adbb2d>

⁸ City of Los Angeles Tree Evaluation, Arborgate Consulting, April 22, 2020.

Total Provided (actual)	22,328
Total Provided (per LAMC 12.21.G.2)	15,588
Required per LAMC Section 12.21G CPIO allowed 50% reduction when meeting provided publicly accessible open space requirements. Plans, MVE Architects, August 20, 2020.	

1.3.2.7 Access and Circulation

There are four existing curb cuts as follows: One driveway on Palos Verdes, one on 6th Street, one on Beacon, and one on 7th Street. These curb cuts will be removed. One new curb cut will be provided on Palos Verdes, north of the current location.

Vehicle access (ingress/egress) would be provided via one driveway along Palos Verdes near the northwest corner of the property, providing access through the rear of the building.

A ramp will provide vehicle circulation to each parking level. There will be a gate within Level 1 to separate the commercial parking from the residential parking.

1.3.2.8 Vehicle Parking

Table 1-7 Vehicle Parking displays the code required and provided parking for the Project.

Per CPIO Appendix A (AQ3/GHG1 C.), 5% of total parking stalls shall be Electric Vehicle Supply Equipment (EVSE) capable.

**Table 1-7
Vehicle Parking**

Use	Quantity	Rate	Total (spaces)	
			Required	Provided
Residential – Studio	83 units	1 space / unit	83	
Residential – 1-bedroom	101 units	1.5 space / unit	152	
Residential – 2-bedroom	84 units	2 space / unit	168	
Residential – 3-bedroom	13 units	2 space / unit	26	
Subtotal			429	
10% Reduction per Bike Ordinance			(42)	
Total Residential			387	500
Commercial	2,316 sf	2 spaces / 1,000 sf	5	
10% Reduction per Bike Ordinance			(1)	
Total Commercial			4	4
Total			391	504
For purposes of the LAMC parking requirements, fractions under 0.5 are rounded down. LAMC Section 12.21.A.4.(k). LAMC Section 12.22.A.25.d.1 Plans, MVE Architects, August 20, 2020.				

1.3.2.9 Bicycle Parking

Table 1-8, Bicycle Parking, provides the amount of required and provided bicycle parking. LAMC 12.21.A.16(a) requires new projects to provide bicycle parking spaces. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather.

**Table 1-8
Bicycle Parking**

Use	Quantity	Short-Term			Long-Term		
		Rate	Required	Provided	Rate	Required	Provided
Residential	1-25 units	1 / 10 units	2.5		1 / unit	25	
	26-100 units	1 / 15 units	5		1 / 1.5 units	50	
	101-200 units	1 / 20 units	5		1 / 2 units	50	
	201+ units	1 / 40 units	2		1 / 4 units	20	
Subtotal			15	15		145	145
Retail	2,316 sf	1 / 2,000 sf	2	2	1 / 2,000 sf	2	2
Total			17	17		147	147
Round down fractions up to 0.5. Minimum of 2 spaces required. LAMC Table 12.21 A.16 (a)(1)(i) (as amended by Ordinance No. 185,480, effective May 9, 2018). Plans, MVE Architects, August 20, 2020.							

1.3.2.10 Lighting and Signage

Project Site signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity and no off-site signage is proposed. Exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting would be integrated into the overall architecture and landscaping.

The Project would include exterior lighting consistent with the Citywide Design Guidelines and Section V, "Design Policies for Individual Projects", of the San Pedro Community Plan. All exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky and security lighting with be integrated into the architectural and landscape lighting system.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

1.3.2.11 Site Security

The Project would provide a security program to ensure the safety of its residents, employees, and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas;

lighting of building entryways and plaza areas; staff training in safety and sound security policies; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems.

1.3.2.12 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC, effective January 1, 2020)⁹ and the 2019 California Green Building Standards Code (CalGreen, effective January 1, 2020).¹⁰

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate stormwater generation on-site. Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for residents and visitors.

The configuration, building massing and orientation of the proposed structure have been intended to lower energy demand and increase the comfort and well-being of users:

- Shading, natural light and ventilation along with building orientation have been considered as part of the site's design, massing and fenestration.
- High performance, low emission coated windows will be used throughout and at certain locations will be slightly recessed from the exterior building plane to regulate sunlight and cut down on solar heat gain fluctuations.
- Awnings at select ground floor uses will reduce heat gain and glare while acting as light shelves to allow indirect light to enter interior spaces.
- Per LAGBC, a minimum 15% of the roof area will be zoned for solar requirements.

1.3.2.13 Anticipated Construction Schedule

⁹ City of Los Angeles Department of Building and Safety, Green Building, available at <http://ladbs.org/forms-publications/forms/green-building>, accessed on March 25, 2020.

¹⁰ California Building Codes: <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo>, accessed on March 25, 2020.

The estimated construction schedule is shown in **Table 1-9, Construction Schedule**.

**Table 1-9
Construction Schedule**

Phase	Schedule	Duration (approx.)
Demolition	Dec 2021 – Jan 2022	2 months
Site Preparation	Feb 2022	1 month
Grading	March 2022 – May 2022	2.5 months
Construction	May 2022 – March 2024	22.5 months
Architectural Coatings	Oct 2023 – March 2024	6 months
Construction schedule, including start, end, and duration dates are estimates only. CAJA Environmental Services, April 2020.		

The estimated operational year is 2024.

The Project would remove the 30,022 square feet of existing buildings.

The amount of materials exported is anticipated to be approximately 68,500 cubic yards.¹¹

The Project will excavate at a depth of approximately 30 feet for 3 levels of subterranean parking, foundation and utility work.

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. It is anticipated that the export will be transported approximately 30 miles away. The possible route from the Site: 6th Street to Harbor Boulevard to I-110 Freeway. Trucks would do the reverse to access the Site. This route avoids residential neighborhoods, and uses the largest capacity roads and nearest direct route to the freeway.

1.3.3 Discretionary Actions and Approvals for the Project

The Project is consistent with the Community Plan (most recently updated in 2017), the zoning designation for Project site and the San Pedro Community Plan Implementation Overlay (CPIO) District. Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:¹²

1. Pursuant to LAMC Section 16.05, Site Plan Review for a development project that results in an increase of 50 or more dwelling units and/or guest rooms.
2. Pursuant LAMC Section 12.37.I, Waiver of Dedication and/or Improvement to the public right of way along Palos Verdes Street, 6th Street and Beacon Street, adjacent to the Project Site.

¹¹ Excavation calculation from applicant, March 2020.

¹² Attachment A filing with Department of City Planning, October 2020.

The requested waiver of dedication along Palos Verdes Street, 6th Street and Beacon Street is to allow wider sidewalks and pedestrian amenities consistent with recent Community Redevelopment Agency Streetscape plans for adjacent streets.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route permit, foundation permits, building permits, and sign permits, including approval of a CPIO Administrative Clearance and other discretionary and ministerial permits and approvals that may be deemed necessary.

All applicable mitigation measures, regulatory measures, and conditions of approval required by the certified Final Environmental Impact Report for the 2017 Community Plan Update (ENV-2009-1558-EIR) (Certified EIR) will be applied to the Project.

2 Regulatory Framework

2.1 Addendum to an EIR and Negative Declaration

Section 15164 of the CEQA Guidelines provides the authority for preparing an addendum to a previously certified EIR or adopted negative declaration. Specifically, Section 15164 states the following:

- (a) *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- (c) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
- (d) *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
- (e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

Under CEQA Guidelines Section 15612 and 15164, an addendum to a certified EIR shall be used in connection with subsequent project review and approval unless one of the following findings is made based on substantial evidence:

- (1) Substantial changes are proposed by Project which will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which Project is undertaken which will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified as complete, shows any of the following:
 - (A) Project will have one or more significant effects not discussed in the Certified EIR;

- (B) Significant effects previously examined will be substantially more severe than shown in the Certified EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of Project, but Project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but Project proponents decline to adopt the mitigation measure or alternative.

2.2 Purpose of this Analysis

The Los Angeles Department of City Planning (Department) has prepared this analysis to determine whether the Addendum to the EIR is in accordance with CEQA and the California CEQA Guidelines.

The analysis of this Addendum indicates that there is no substantial evidence to support any of the findings described in Section 15162 of the CEQA Guidelines. Accordingly, in accordance with Section 15164 of the CEQA Guidelines the City has determined that an Addendum to the previously adopted EIR (the Certified EIR) is the appropriate documentation to address the proposed revisions.

The environmental impacts associated with the Approved Project were addressed in the previously Certified EIR and Statement of Overriding Considerations. The proposed Project implements the Approved Project, and as discussed below would not result in any new significant impacts and would not increase the severity of the previously identified significant impacts. Additionally, the “circumstances under which the project” would be undertaken are no different than described in the EIR (refer to Section 15162(a)(2)).

Finally, there is no “new information of substantial importance” that would result in new or increased significant impacts not already identified in the EIR (refer to Section 15162(a)(3)). For these reasons, a subsequent EIR to address this new information is not required.

3 Revisions to Appendix G of the CEQA Guidelines

3.1 Introduction

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018, which was adopted after preparation of the Certified EIR. The revisions to the CEQA Guidelines were adopted largely to create efficiencies and to align the CEQA Guidelines with California appellate court and Supreme Court decisions. The revisions that are most applicable to the EIR are those associated with changes to Appendix G.

Appendix G of the CEQA Guidelines contains a sample initial study format. The purpose of an initial study is to assist lead agencies in determining whether a project may cause a significant impact on the environment. To help guide that determination, Appendix G asks a series of questions in the form of a checklist regarding a range of environmental resources and potential impacts. The City uses Appendix G in their EIRs to demonstrate that a project would not result in significant impacts on the environment that cannot be mitigated.

When the Appendix G checklist was originally developed, it contained only a handful of questions. Over time, the list of questions has grown in response to increasing awareness of the effects of development on the environment. Currently, the sample checklist contains 89 questions divided into 20 categories of potential impacts.

3.2 Modifications to Appendix G of the CEQA Guidelines

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided below by environmental topic. Based on the discussion below, while Appendix G was modified, the modified Appendix G questions that would apply to the Project have been addressed within the Certified EIR.

3.2.1 Aesthetics

Consistent with SB 743, the modifications clarify that the checklist questions regarding aesthetics do not apply to projects that are located in a transit priority area and are defined as set forth in PRC Section 21099. Per SB 743, aesthetic impacts for such projects are less than significant. For those projects that do not meet the definition provided in PRC Section 21099, the modifications provide distinct checklist questions for public views and consistency with zoning regulations governing scenic views, depending upon whether the project is within a non-urbanized or urbanized area. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.1, Aesthetics, of the Draft EIR.¹³ Further, as discussed below, no aesthetic impacts associated would occur.

¹³ All references to the "Draft EIR" herein are to the Draft EIR of the Certified EIR.

3.2.2 Agriculture and Forestry Resources

These checklist questions were not updated as part of the modifications.

3.2.3 Air Quality

These checklist questions were modified to delete Checklist Question III.b regarding violation of air quality standards and to modify the question regarding odors. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.2, Air Quality, of the Draft EIR.

3.2.4 Biological Resources

Checklist Question IV.c has been modified to remove the reference to Section 404 of the Clean Water Act. This modification does not affect the analysis of biological resources provided in Section 4.3, Biological Resources, of the Draft EIR.

3.2.5 Cultural Resources

These modifications consist of a minor word change to Checklist Question V.a and moving Checklist Question V.c from the cultural resources subsection to the geology subsection of Appendix G. Impacts to cultural resources are addressed in Section 4.4, Cultural Resources, of the Draft EIR.

3.2.6 Energy

The modifications include creating a separate subsection for energy, and also incorporating language from Appendix F of the CEQA Guidelines. These added checklist questions have already been addressed in Section 4.14, Utilities and Service Systems, of the Draft EIR.

3.2.7 Geology and Soils

These checklist questions have been modified to focus on both the direct and indirect impacts associated with geology and soils and to move the analysis of paleontological resources to this topic (from the cultural resources section). Impacts to geology and soils are fully addressed in Section 4.5, Geology and Soils, of the Draft EIR. Further, impacts with respect to paleontological resources are addressed in Section 4.4, Cultural Resources, of the Draft EIR.

3.2.8 Greenhouse Gas Emissions

These checklist questions were not changed as part of the modifications and are addressed in Section 4.6, Greenhouse Gas Emissions, of the Draft EIR.

3.2.9 Hazards and Hazardous Materials

These checklist questions were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question

VIII.g (formerly Checklist Question VIII.h) includes both direct or indirect impacts associated with wildland fires. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.7, Safety/Risk of Upset, of the Draft EIR.

3.2.10 Hydrology and Water Quality

These checklist questions were revised to provide clarification and eliminate redundancy. All of the topics in these checklist questions, including those related to water quality, groundwater, flooding, and flood hazards, are thoroughly addressed in Section 4.8, Hydrology and Water Quality, of the Draft EIR.

3.2.11 Land Use and Planning

Checklist Question X.b has been revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Checklist Question X.c has been deleted, as it addressed habitat conservation plans, which are already addressed under the biological resources checklist questions. An analysis of the Project's consistency with land use plans, policies, and regulations is provided in Section 4.9, Land Use and Planning, of the Draft EIR.

3.2.12 Mineral Resources

These questions were not updated as part of the modifications. Impacts to mineral resources are fully addressed in Section 4.5, Geology and Soils and Mineral Resources, of the Draft EIR.

3.2.13 Noise

Checklist Questions XII.a and XII.b were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, Checklist Questions XII.c, XII.d, and XII.f were deleted, as they were redundant, and Checklist Question XII.e was revised accordingly. The topics associated with these modified questions are fully addressed in Section 4.110, Noise, of the Draft EIR.

3.2.14 Population and Housing

Checklist Question XIII.a was clarified to focus on potential impacts associated with unplanned growth, and Checklist Questions XIII.b and XIII.c were combined. The topics in these modified questions are fully addressed in Section 4.11, Population, Housing, and Employment, of the Draft EIR.

3.2.15 Public Services

These checklist questions were not updated as part of the modifications and are responded to in Sections 4.12, Public Services, of the Draft EIR.

3.2.16 Recreation

These questions were not updated as part of the modifications and are responded to in Section 4.12, Public Services, of the Draft EIR.

3.2.17 Transportation

Checklist Questions XVI.a and XVI.f were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. Checklist Question XVI.c regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the hazards questions. Former Checklist Question XVI.d (now Checklist Question XVI.c) was revised to add “geometric” for clarity. All of the topics in these questions were addressed in Section 4.13, Transportation and Traffic, of the Draft EIR.

In addition, Checklist Question XVI.b was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The City adopted a VMT methodology on July 30, 2019. The traffic analysis prepared for the Project, and included herein, has therefore been prepared using the City’s adopted VMT methodology.

3.2.18 Tribal Cultural Resources

Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project.

The NOP for the San Pedro New Community Plan EIR was released on January 31, 2008, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The Final EIR was released April 2017. Nevertheless, the issues related to tribal cultural resources were addressed within Section 4.4, Cultural Resources, of the Draft EIR.

3.2.19 Utilities and Service Systems

These checklist questions were revised to reduce redundancy. Specifically, Checklist Question XVIII.a was eliminated, as wastewater treatment was already addressed in former Checklist Question XVIII.e (now Checklist Question XVIII.c). In addition, former Checklist Questions XVIII.b and XVIII.c were combined to address all infrastructure types in one question (now Checklist Question XVIII.a) and to include the addition of telecommunications. Former Checklist Question XVIII.d regarding water supply was also updated to clarify that the analysis of water

supply should include reasonably foreseeable future development during normal, dry and multiple dry years. Former Checklist Questions XVIII.f and XVIII.g regarding solid waste impacts were also clarified. All of the topics in these questions were addressed in Section 4.14, Utilities and Service Systems, of the Draft EIR.

3.2.20 Wildfire

New Checklist Question XX. Wildfire pertains to projects that are located in, or near, state responsibility areas or lands classified as very high fire hazard severity zones. The Project Site is not located in or near state responsibility areas, nor is the Project Site located in a City-designated Very High Fire Hazard Severity Zone. Therefore, these questions are not applicable to the Project.

4. Environmental Impact Analysis

The information below addresses each of the environmental issues that were previously analyzed within the scope of the Certified EIR and the recently revised Appendix G of the CEQA Guidelines. The conclusions of the Certified EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the Certified EIR.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162, requiring preparation of a subsequent or supplemental EIR, have been triggered. This analysis provides the following information as to each of the impact thresholds analyzed in each of the impact categories:

Impact Determination in the Certified EIR. This column sets forth the impact determination made in the Certified EIR for each impact threshold.

Does the Project Involve New Significant Impacts or Substantially More Severe Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the Project will result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

Any New Information Requiring New Analysis? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. New studies completed as

part of this environmental review are attached to this Addendum, or are on file with the Planning Department.

Mitigation Measures Addressing Impacts. Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. A “yes” response will be provided in either instance. If “No” is indicated, this environmental review concludes that the impact does not occur with this project and therefore no mitigations are needed.

DISCUSSION AND MITIGATION SECTIONS. A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue and the status of any mitigation that may be required or that has already been implemented. Applicable mitigation measures from the prior environmental review that apply to the project are listed under each environmental category.

Conclusions. A discussion of the conclusion relating to the analysis contained in each section.

4.1 Aesthetics

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Significant and Unavoidable	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant and Unavoidable	No	No	No	No
(c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Significant and Unavoidable	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant and Unavoidable	No	No	No	Yes

4.1.1 Impact Determination in the Certified EIR

Scenic Vistas

While citywide design guidelines, element policies and city regulations would help reduce potential impacts to scenic vistas, adoption and implementation of the proposed San Pedro Community Plan and implementing ordinances could still have a substantial adverse effect on scenic vistas, recognized/valued views and/or result in view obstruction available from a length of a public roadway, bike path, or trail. Mitigation Measure MM4.1-1 would further help to reduce this impact, as would regulations in the City's Building and Zoning Code that govern setbacks, height, density, massing, and other development characteristics. However, while plan policies and guidelines, existing rules and regulations, and the implementation of feasible mitigation measures would reduce this impact, in many cases to less than significant, a level of uncertainty remains with the introduction of additional urban development. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact to scenic vistas.

Scenic Resources

Although Mitigation Measure MM4.1-1 would be implemented to further protect scenic resources, because specific development projects are not known, the adoption and implementation of the proposed plan and implementing ordinances could affect scenic resources, including locally recognized desirable aesthetic features. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact to scenic resources.

Visual Character

The City's existing policies and regulations would continue to protect the existing visual character. Existing policies described above and Mitigation Measure MM4.1-1 would be implemented to further protect the existing visual character. However, the adoption and implementation of the proposed plan and implementing ordinances could still affect existing visual character, aesthetic value, and quality of the community, since specific details of development projects are not known. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact to visual character.

Light and Glare

The Los Angeles Municipal Code (LAMC) contains specific regulations with respect to light and glare. LAMC Section 12.21 A.5(k) (Amended by Ordinance No. 171,858) states that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. Additionally, any new lighting would be designed to conform to applicable standards in LAMC Sections 93.0117 and 12.21 A.5(k), which pertain to outdoor lighting affecting residential property. All new development would be required to be consistent with the LAMC, which would ensure that light-sensitive areas adjacent to or within new development would be protected from spillover or excessive lighting. Conformance to LAMC regulations and implementation of Mitigation Measure MM4.1-1 would help reduce this impact. However, the introduction of new development as part of the proposed plan and implementing ordinances could result in changes in ambient illumination, light, glare, or spillover lighting. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact to light and glare.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to aesthetics:

MM4.1-1 The CPIO District shall include regulations that minimize site-specific aesthetic impacts, including impacts to views, lighting and shading.

Environmental Standards

The following environmental standard was included in CPIO to reduce impacts related to aesthetics:

AE1 Projects shall be designed to ensure the following:

- a. All lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.

NOTE: MM4.1-1 required that the CPIO District include regulations that minimize site specific aesthetic impacts, including impacts to lighting and shading. In addition to the above environmental standard, this mitigation measure is implemented by the design standards in the CPIO District in Section 2 of Chapters II-VI related to building height, density, disposition, and design and signage.

4.1.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Scenic Vistas

The Project Site is in a relatively flat area of the San Pedro area. Other streets are densely populated with commercial buildings. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels. There are minimal views of the Vincent Thomas Bridge and Port of Los Angeles loading cranes.

The Los Angeles Harbor is minimally visible from the Site due to intervening buildings (San Pedro Municipal Building, LA Waterfront Building, and the distance across Harbor Building and Samson Way. At the street level, views in all directions are largely constrained by structures on adjacent parcels. No hills or mountains are visible. These views would not be substantially affected by the Project since views from the public sidewalks would remain.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.¹⁴ Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual

¹⁴ Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; *Mira Mar Mobile Community v. City of Oceanside*, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

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 tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, no impact would occur.

Scenic Resources

There is no historic structure on the Site. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway.

The closest officially designated state scenic highway is approximately 27 miles west of the Project Site (State Route 27, Topanga Canyon Boulevard, from Mulholland Highway to Pacific Coast Highway) and approximately 32 miles north of the Project Site (State Route 2, Angeles Crest Highway, from 3 miles north of I-210 in La Canada to the San Bernardino County Line).¹⁵

The nearest City of Los Angeles designated scenic highway is Harbor Boulevard, approximately one block east of the Project Site.¹⁶

The Project is not located along or within the scenic vistas or viewsheds of this highway. The Project would not damage and/or remove any scenic resources within a State or City designated scenic highway. Therefore, no impact would occur.

Visual Character

The Project Site is located within the San Pedro Community Plan area, which is characterized by commercial districts and residential neighborhoods with a mix of older historic structures and newer architecture. The Site is within the San Pedro Community Plan Implementation Overlay District (CPIO), which provides guidelines and standards for development projects, including new development and improvements to existing properties within San Pedro. The intent of the CPIO is to provide design guidance and direction to enhance identity and improve the appearance of the area. The Project Site is located in an urbanized setting and is surrounded by commercial uses, institutional uses, and surface parking lots.

The building heights and massing from the implementation of the Project would create a change in the visual character of the Project Site from what currently exists. However, it would be similar in height and massing compared to the recently developed commercial and multi-family residential structures surrounding the project site and is consistent with the evolving visual character of the area and the Regional Center land use designation for the area. The Project will

¹⁵ Caltrans State Scenic Highways: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed March 23, 2020.

¹⁶ Mobility Plan 2035: <https://planning.lacity.org/plans-policies/initiatives-policies/mobility>, accessed March 23, 2020.

be similar in size and scale to multi-story structures in the vicinity, including the 7-story government building to the east, the 10-story hotel building to the west, and the under-construction 7-story mixed-use building to the north.

- The property to the north across 6th (550 Palos Verdes) contains a 7-story, 83-foot tall mixed-use, mixed-income development with 375 residential dwelling units and 5,200 square feet of ground floor commercial.
- The property to the east across Beacon (639 Beacon) is developed with a 7-story municipal building, also known as San Pedro City Hall and has an approximate height of 110-feet.
- Properties to the south across 7th are currently underdevelopment with surface parking lots, though their existing General Plan Land Uses are still designated as Regional Commercial per the San Pedro Community Plan.
- The property to the west across Palos Verdes (601 Palos Verdes) is developed with a 10-story, approximately 120 foot, Crowne Plaza Hotel.
- The properties to the northwest of the Site are currently improved with a 12-story, approximately 135 foot office building (222 6th Street), and 16-story, 170 foot tall luxury residential building, also known as the “Vue” (255 5th Street).

The buildings surrounding the Project Site vary in age and architectural style, from more contemporary structures that were constructed from the 1920s through the 1940s. The Project’s design is a contemporary style that is more compatible with the more contemporary designs incorporated in buildings constructed in the area over the last 15 years. The design would include architectural features such as sidewalk trees, balconies, articulated facades, and varying building materials. As a result of the building’s architectural design, the Project would be effectively integrated into the aesthetic of the area by means of design, size, massing, and location.

During construction, construction walls and barriers would be erected to protect the Site from vandalism and, which have the potential to attract unauthorized bills and postings. The Project will comply with LAMC Section 14.4.17, which regulates temporary signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

The various at-grade uses are appropriately scaled and expressed within the massing, with retail and amenity spaces consisting of expansive storefronts and enhanced building materials. The residential portions utilize a combination of brick, plaster and punched openings with awnings and front stoops bringing human scale. Additionally, the Project utilizes common open

space as courtyards, plazas and viewing decks to break up the building massing and define building hierarchy with visual interest. At level 2, and mid-block along 7th, is the Project's pool courtyard. A second courtyard is located at level 2, just above the project's featured ground floor plaza. Each of these spaces accompany active uses while defining the massing.

Aesthetically, the underlying architectural idea for the Project is to compositionally juxtapose the historical Beaux Arts expression of the adjacent City Hall with the more contemporary expression of the surrounding projects to the northwest and along 6th and Palos Verdes. As such, the Project's design integrates treatments distinct to these individual "styles" to serve as a transitional building within its context. The Project utilizes courtyard breaks in the building to reduce the project's mass and height to the surrounding context. Tower elements and stepped top floor massing at the Project's prominent corners further soften the massing and corresponding roofline. The 5 feet step-back at level 3, and along the building's street frontage, defines an appropriate pedestrian scaled base. Storefront and punched opening fenestration at the ground floor express internal uses of retail/amenity and residential, respectively, thus defining the building's relationship to the neighborhood. Furthermore, front stoops at the ground floor define residential entries and provide a change in elevation to create a sense of privacy.

The Project would contain a minimum of 5,000 square feet of publicly accessible open space located on the ground floor with a direct pedestrian connection to 6th and Beacon. The publicly accessible open space would not be enclosed by any walls, fences, gates or obstructions and would encompass accent planting, brick paving patterns to match existing conditions and would provide newly planted street trees along all four sides of the project. The publicly accessible open space was designed to enhance the pedestrian experience and to meet the goals and guidelines of the Regional Commercial subarea of the San Pedro CPIO. Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed building, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no impact would occur.

Light and Glare

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential and commercial uses. Vehicle headlights from traffic around the Site contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Site currently contains three low-rise buildings with window illumination.

The Project would construct an 8-story building and interior lighting through windows would increase as compared to the existing setting. Also the residential nature of the Project would create additional lighting into the night hours. The Project will provide illumination at street level

for security. All security lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses.

The Project will include architectural features and facades with a low level of reflectivity. The ground floor commercial area will have low reflectivity to allow greater visual access into the building and appeal to a pedestrian aesthetic. Upper floor windows will be less visible to the pedestrian environment and will be suitably shielded to prevent visual trespass and allow privacy to the residential spaces. As such, the Project will not result in a substantial amount of light that would adversely affect the day or night-time views in the project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized location that is already illuminated at night, and the Project’s lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Site. This would ensure that lighting would be installed to minimize light trespass to off-site uses. Therefore, no impact would occur.

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have facades that are broken up by the various articulation. The parking structure is wrapped and contained within the building, to provide a shield so that light from vehicles and building lighting does not project upwards. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. This would ensure that the building will not create substantial glare. Therefore, no impact would occur.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to aesthetics, the Project would nevertheless implement Mitigation Measure MM4.1-1 from the Certified EIR.

Per MM4.1-1, the City reviewed the environmental analysis of Project, which included site-specific aesthetic impacts.

Environmental Standards

The Project would implement Environmental Standard AE1 from the CPIO. Lighting would comply with the LAMC and be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.

4.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.1.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to visual or aesthetic resources. No substantial changes in the aesthetic or visual environment have occurred since certification of the EIR, and no substantial new scenic resources have been identified within the vicinity of Project Site that would result in new or more severe significant environmental impacts.

4.1.5 EIR's Mitigation Measures Addressing Impact

The Project would implement Mitigation Measure MM4.1-1 from the Certified EIR.

The Project would implement Environmental Standard AE1 from the CPIO.

4.1.6 Conclusion

Based on the above, no new significant aesthetic impacts or a substantial increase in previously identified aesthetic impacts would occur as a result of the Project. Therefore, the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.2 Agriculture and Forestry Resources

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No

4.2.1 Impact Determination in the Certified EIR

The Certified EIR stated that potential impacts to Agriculture Resources were determined not to be significant. There is no land designated for agricultural purposes and there are no agricultural uses within the CPA. A few parcels are zoned A1-1, which allows for agricultural uses; however, those lands have been developed with residential uses and therefore, are not utilized for agricultural activities. As such, no farmland would be at risk for conversion and no conflicts would exist with any Williamson Act contracts due to implementation of the proposed plan. Therefore, impacts to Agricultural Resources were not further analyzed in the Certified EIR.

Mitigation Measures

No impacts related to agricultural and forestry resources were determined for the Approved Project, and no mitigation measures were required.

4.2.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in the Certified EIR, the San Pedro CPA does not contain land uses that are considered prime or important farmlands, agricultural land uses, timberlands, or forest land.

The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project Site is zoned C2, and the General Plan land use designation for the Site is Regional Commercial. The Site is developed with three buildings and parking lot. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.¹⁷ Therefore, no impact would occur.

The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.¹⁸ The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

Neither the Project Site nor surrounding parcels are zoned for forest land or timberland.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new

¹⁷ State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, March 23, 2020.

¹⁸ State of California Department of Conservation, Williamson Act Program, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed March 23, 2020.

significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.2.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to agricultural or forestry resources. No substantial changes have occurred since certification of the EIR, and no new agricultural or forestry resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Project will not result in any agricultural or forestry resources impacts, a review of feasible mitigation measures is not required.

4.2.5 EIR's Mitigation Measures Addressing Impact

Because the Certified EIR determined the Approved Project would have no impacts on agricultural or forestry resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.2.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to agricultural or forestry resources would occur as a result of the Project. Therefore, the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.3 Air Quality

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact	No	No	No	No
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	No	No	No	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	No	No	Yes
(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix B** to this Addendum:

B-1 Air Quality and GHG Report and Appendices, DKA Planning, April 2020

B-2 Localized Significance Threshold Analysis, Air Quality Dynamics, March 2020

4.3.1 Impact Determination in the Certified EIR

The Approved Project and implementing ordinances contain goals, objectives, policies, and programs that the City would promote during the life span of the San Pedro Community Plan. Goals of the Community Plan are intended to promote and enhance infill, mixed-use, and transit-oriented development within the CPA. The increase in density and transit opportunities will aid in the reduction of air quality emissions through the reduction in vehicle miles traveled (VMT). While the Transportation Improvement and Mitigation Program (TIMP) for the Approved Project shows that VMT will increase as a result of area growth, growth projections and shifts in land use within the San Pedro CPA in conjunction with the anticipated increases in vehicle efficiencies in the future result in a reduction in criteria pollutant

Air Quality Plan

The Certified EIR concluded that although there is an increase in employment over what was projected in the 2007 AQMP, the limited anticipated growth in population, and, therefore, VMT, ensures that the Approved Project is consistent with projections as provided to SCAG, and below the AQMP projections. The Certified EIR found that the impact less than significant, and no mitigation was required.

Criteria Pollutant

Individual development projects under the proposed plan will be required to analyze the impacts from construction activities and to implement all feasible and appropriate mitigation to reduce project-specific impacts to below regulatory thresholds. Due to the unknown level of construction activity that would occur on any given day during the proposed plan build-out, this is considered a potentially significant impact. Implementation of standard City mitigation measures and code compliance would reduce this impact, but not necessarily to a less-than-significant level. Individual development projects could, even with implementation of mitigation, result in an air quality violation or a substantial contribution to an existing air quality violation. Emissions would be anticipated to be lower during years where economically the area is experiencing a slow down and higher during years where the economic situation is at peak. It is anticipated that the daily average emissions (between existing and 2030) would exceed the SCAQMD's recommended thresholds for construction emissions, although individual years (and months and days) would vary substantially over the planning horizon. Therefore, this would be a significant and unavoidable impact for construction activities on a program level.

All individual projects developed under the proposed plan would require the incorporation of mitigation measures to reduce air quality impacts. While the implementation of these measures will reduce air quality impacts, buildout of the proposed plan would result in vehicle and area emissions that would exceed the SCAQMD's daily thresholds for ROG, PM10 and PM2.5. Therefore, this would remain a significant and unavoidable impact with respect to ROG, PM10 and PM2.5.

Pollutant Concentrations

No intersection currently exceeds national or state standards for 1-hour or 8-hour CO concentrations. Therefore, CO hotspots do not currently exist in the CPA. This impact is considered less than significant, and no mitigation is required.

Development under the proposed plan would require an LST analysis to determine the localized impacts to sensitive receptors. However, individual projects, even with implementation of the identified mitigation, could exceed LST thresholds. Therefore, this would be a significant and unavoidable impact for construction activities.

Odors

Potential measures that could be implemented on a project level include locating potential odor sources downwind from existing sensitive receptors and potential sensitive receptors upwind from existing odor sources, maintaining an adequate buffer between potential odor sources and receptors such that emitted odors are dissipated before reaching the receptors (minimum of 500 feet depending on odor source), and designing odor-emitting source facilities such that odor emitters are located as far from potential receptors as possible and stack heights are balanced to provide the maximum dispersion of odor between the stack and the nearest sensitive receptors. Appropriate measures would be considered by the City as development projects are proposed, and appropriate mitigation will be implemented on the project level. Therefore, this impact would be considered less than significant, and no mitigation is required on a program level.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to air quality:

MM4.2-1 The CPIO District shall include regulations for construction that require the following or comparable best management practices be included in contract specifications and/or printed on plans:

- Use properly tuned and maintained equipment.
- Construction contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NOX diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- Maintain construction equipment in good operating condition to minimize air pollutants.

- Construction contractors shall utilize materials that do not require painting, as feasible.
- Construction contractors shall use pre-painted construction materials, as feasible.
- Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

MM4.2-2 The CPIO District shall include regulations that require construction projects greater than 5 acres to submit an air quality study that discuss the project's potential emissions for the following: CO, NOX, PM10, and PM2.5.

MM4.2-3 The CPIO District shall require the following greenhouse gas reduction measures are incorporated into the project design:

- For non-residential projects: all outdoor lighting systems shall be directed away from the window of any residential uses and shall comply with the non-residential Light Pollution Reduction standards in the Green Building Code of the Municipal Code.
- For non-residential projects: whenever new fixtures are installed, all water closets, urinals, shower heads, faucets and dishwashers shall be High Efficiency fixtures installed in accordance with the regulations of the City's Water Conservation Ordinance.
- For Multi-family and Commercial Projects: parking facilities shall have five (5) percent of the total parking spaces, but not less than one (1) space, capable of supporting future Electric Vehicle Supply Equipment (EVSE) charging locations.

Environmental Standards

The following environmental standards were included in CPIO to reduce impacts related to air quality:

AQ1 Projects shall require the following or comparable best management practices be included in contract specifications and/or printed on plans:

- a. Use properly tuned and maintained equipment.
- b. Construction contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- c. Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible.
- d. Use heavy duty diesel-fueled equipment that uses low NOx diesel fuel to the extent it is readily available and feasible.
- e. Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- f. Maintain construction equipment in good operating condition to minimize air pollutants.
- g. Construction contractors shall utilize materials that do not require painting, as feasible.
- h. Construction contractors shall use pre-painted construction materials, as feasible.
- i. Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- j. Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.
- k. Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- l. Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

AQ2 Construction projects greater than 5 acres shall submit an air quality study that discuss the project's potential emissions for the following: CO, NOx, PM10, and PM 2.5.

AQ3/GHG1 Projects shall incorporate the following greenhouse gas reduction measures into the project design:

- a. For non-residential Projects: all outdoor lighting systems shall be directed away from the window of any residential uses and shall comply with the non-residential Light Pollution Reduction standards in the Green Building Code of the Municipal Code.
- b. For non-residential Projects: whenever new fixtures are installed, all water closets, urinals, shower heads, faucets and dishwashers shall be High Efficiency

fixtures installed in accordance with the regulations of the City's Water Conservation Ordinance.

c. For Multi-Family and Commercial Projects: parking facilities shall have five percent of the total parking spaces, but not less than one space, capable of supporting future Electric Vehicle Supply Equipment (EVSE) charging locations.

4.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project does not propose any changes to the zoning or land use designation for Project Site, and therefore, the Project's air quality impacts were accounted for within the analysis contained in the Certified EIR.

Air Quality Plan

SCAQMD CEQA Air Quality Handbook Policy Analysis and SCAG 2016-2040 RTP/SCS Consistency

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, including the SCAQMD's 2016 AQMP and growth projections within the SCAG 2016–2040 RTP/SCS. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the Project include air quality mitigation measures; or
 - To what extent is Project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. SO₂ emissions would be negligible during construction and long-term operations, and, therefore, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria

pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities, and, therefore, the Project's PM₁₀ and PM_{2.5} emissions during construction were analyzed in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM₁₀ and PM_{2.5}. As demonstrated in the analysis below, the increases in PM₁₀ and PM_{2.5} emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site. The proposed construction schedule and equipment mixture, including load factors is included in **Appendix B** of this Addendum.

Additionally, the Project's maximum potential NO_x and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. NO_x and CO would not exceed the SCAQMD-recommended localized significance thresholds. Therefore, Project construction would not result in a significant impact with regard to localized air quality.

Because the Project would not introduce any substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.¹⁹ As indicated below, no intersections would require a CO hotspot analysis, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

As discussed below, an analysis of potential localized operational impacts from on-site activities was conducted. As demonstrated in the analysis below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning

¹⁹ SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.

strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

SCAG introduced its proposed 2020-2045 RTP/SCS, titled "Connect SoCal," in 2019, which included virtually the same goals and policies as the 2016-2040 RTP/SCS, and which was formally adopted by SCAG's Regional Council on September 3, 2020. The updated plan calls for \$639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035, accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated RTP/SCS calls for a number of land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve climate change objectives.

On September 23, 2020, SCAG adopted the 2020–2045 RTP/SCS update, which was subsequently accepted by CARB on October 30, 2020 as meeting SCAG's SCS target reductions of greenhouse gases.²⁰ The Plan aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for \$639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent

²⁰ CARB, *Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination, October 30, 2020.*

- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. The Project Site is located within the Downtown Los Angeles HQTA.
- Locating 15 percent more jobs in HQTAs
- Reducing PM_{2.5} emissions by 4.1 percent
- Reducing GHG emissions by 19 percent by 2035

While the 2020-2045 RTP/SCS has been adopted by SCAG as of September 2020, it has not been incorporated into the region's air quality plan. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP. Thus, the 2016 RTP/SCS is used.

According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2020 is approximately 4,063,756 persons.²¹ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,884 persons²², an increase of 109,128 persons. Based on a household size factor of 2.41 persons per household in the City²³, the Project is estimated to generate a residential population of 677 persons at full buildout, which would represent approximately 0.6 percent of the population growth forecasted by SCAG in the City of Los Angeles between 2020 and 2024.

Development of the Project also would result in approximately 7 employment positions on-site. According to SCAG's 2016–2040 RTP/SCS, the forecasted employees for the City of Los Angeles Subregion in 2020 is approximately 1,831,356 persons.²⁴ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have

²¹ Based on linear interpolation of 2012-2040 data. The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Population between 2012 (3,845,500) and 2040 (4,609,400) is projected to grow by 763,900 over the 28-year period, or 27,282 per year average.

²² Based on linear interpolation of 2012-2040 data. The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012 for the baseline and buildout years. Employment between 2012 (1,696,300) and 2040 (2,169,100) is projected to grow by 472,700 over the 28-year period, or 16,882 per year average.

²³ The source for the 2.41 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

²⁴ Based on linear interpolation of 2012-2040 data.

approximately 1,898,884 employees²⁵, an increase of 67,528 employees. Thus, the Project's estimated 7 employees would constitute approximately 0.01 percent of the employment growth forecasted between 2020 and 2024. Because the Project's resulting residential and employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would serve to implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG.

The Project would be designed and constructed to support and promote environmental sustainability. The Project will comply with the Los Angeles Green Building Code (LAGBC),²⁶ which builds upon and sets higher standards than those in the California Green Building Standards Code (CalGreen).²⁷ The Project represents an infill development within an existing urbanized area that would *concentrate new* residential, office, and retail commercial uses within an HQT.

"Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2016 AQMP. The 2016 AQMP is the SCAQMD plan for improving regional air quality in the Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour O₃ control plan with new commitments for short-term NO_x and VOC reductions.

²⁵ Based on linear interpolation of 2012-2040 data.

²⁶ LA Department of Building and Safety: <http://ladbs.org/forms-publications/forms/green-building>

²⁷ California Building Codes: <http://www.bsc.ca.gov/Codes.aspx>

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in the following analyses, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions, and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NO_x reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. The Project would be required to comply with all new and existing regulations set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project Site is classified as “Regional Commercial” in the General Plan Framework and the Community Plan, a classification that allows residential uses, office, and commercial uses by right. As such, the RTP/SCS’ assumptions about growth in the City accommodate housing, population, and job growth on this Site.

As a result, the Project would be consistent with the growth assumptions in the City’s General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region’s air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region’s emissions inventory for the 2016 RTP/SCS and 2016 AQMP (while the 2020-2045 RTP/SCS has been adopted by SCAG as of September 2020, it has not been incorporated into the region’s air quality plan). Therefore, the Project would result in less-than significant impacts related to consistency with the AQMP.

City of Los Angeles Policies

The Project would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT, in addition to bicycle parking. The Project would also be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops.

The Project would be consistent with applicable policies of the Air Quality Element. The Project would include bicycle parking for residents, employees, and visitors that could reduce VMT, and encourage use of alternative modes of transportation such as walking, biking, and using transit in the area.

The City’s General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City’s clean air goals. As illustrated in **Table 4.3-1**, the Project is consistent with the applicable policies in the Air Quality Element. Therefore, the Project would result in less-than significant impacts related to consistency with the Air Quality Element.

Table 4.3-1
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Not Applicable. There are no unpaved roads as part of the Project.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project would be located in an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes. The Project is a mixed-use development that would include limited retail employers that could implement these demand management strategies. Transit use will benefit from the substantial service in the vicinity of the project. The Project would also promote bicycle transportation by providing bicycle parking spaces, pursuant to LAMC section 12.21 A.4.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Where appropriate, the property management company could encourage telecommuting with future residents and tenants.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. Where appropriate, the Project could include tenants that promote alternative commute options in the future.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. Where appropriate, the Project may include parking management practices in the future to reduce single-occupancy vehicle trips. The provision of bicycle parking spaces could reduce demand for auto parking.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable. The Project would not include facilities for special events.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Project would minimize traffic impacts at the study intersections.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses. The Project's commercial uses would serve

Table 4.3-1
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	Project residents and others in the vicinity, thereby reducing vehicle miles traveled that would otherwise be required to travel to similar uses elsewhere in the community.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes, including close proximity to bus routes service operating by Metro.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts are analyzed in this document.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to Metro bus routes. Employers in the retail uses could offer other demand management programs.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Not Applicable. This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions	Not Applicable. This policy calls for the City to promote clean air awareness through its public

Table 4.3-1
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
that individuals can take to reduce air emissions.	awareness programs.
Source: DKA Planning, 2020. CAJA, 2020	

Construction

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.2 model using assumptions from the Project's developer, including the Project's construction schedule of 28 months. **Table 4.3-2** summarizes the potential construction schedule that was modeled for air quality impacts.

Table 4.3-2
Potential Construction Schedule

Phase	Duration	Notes
Demolition	Months 1-2	Demolition of existing structures and asphalt parking lot and hauled up to 30 miles away.
Site Preparation	Month 2	
Grading	Months 3-4	68,500 cubic yards of soil export hauled to off-site location 30 miles away
Building Construction	Months 5-28	N/A
Architectural Coatings	Months 22-28	N/A
Source: DKA Planning, 2020.		

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403 would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities. NOX emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As stated above, it is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

This analysis also assumes a single-trip haul distance of up to 30 miles to an off-site landfill. However, closer locations may be determined feasible, which would result in lower emissions for the Project.

As shown in **Table 4.3-3**, the construction of the Project will produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table 4.3-3
Estimated Daily Construction Daily Emissions - Unmitigated

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2021	2	22	16	<1	2	1
2022	3	54	25	<1	5	2
2023	16	18	28	<1	3	1
2024	16	18	27	<1	3	1
Maximum Regional Total	16	54	28	<1	5	2
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	14	20	14	<1	2	1
Localized Threshold	--	57	585	--	4	3

Table 4.3-3
Estimated Daily Construction Daily Emissions - Unmitigated

Exceed Threshold?	N/A	No	No	N/A	No	No
<p>The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)</p> <p>Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in South Coastal LA County source receptor area.</p>						

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (onsite) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.²⁸ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2016–2018) for the Project area.

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the South Coastal LA SRA based on construction site acreage that is less than or equal to one acre.

Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences at 60 feet from the Project Site (Multi-family residences, 550 Palos Verdes). The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters (82 feet).

As shown in **Table 4.3-3**, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACM) that address fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

A cumulatively considerable net increase would occur if the project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Construction of the Project would not

²⁸ SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

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

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

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

There is an existing regional cumulative impact associated with O3, NO2, PM10, and PM2.5 because the Basin is designated as a State and/or federal nonattainment air basin for these pollutants. However, an individual Project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. As discussed above, construction and operational emissions would not exceed any applicable SCAQMD thresholds of significance. With respect to the Project's construction-related air quality emissions and cumulative Air Basinwide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As stated above, the Project would comply with applicable regulatory requirements, including the SCAQMD Rule 403 requirements. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Air Basin-wide would comply with these same regulatory requirements and would implement all feasible mitigation measures when significant impacts are identified.

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown in **Table 4.3-3**, Project construction daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative construction-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant.

Operation

Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 294 net vehicle trips (1,971 gross daily trips minus 1,677 existing gross daily trips) on a peak weekday in 2024.²⁹ The air quality analysis conservatively accounts for all daily trips as new emissions. CalEEMod program generates estimates of emissions from energy use based on the land use type and size.

As shown in **Table 4.3-4**, the Project would not exceed the SCAQMD's regional or localized significance thresholds. The Project operational impacts on long-term air pollution would be considered less than significant. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

Table 4.3-4
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	6	<1	23	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	3	17	47	<1	14	4
Existing Sources	-4	-14	-34	<1	-8	-2
Net Regional Total	6	4	31	<1	6	2
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	3	<1	18	<1	<1	<1
Localized Significance Threshold	--	57	585	--	1	1
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in South Coastal LA County source receptor area.						

As for cumulative operational impacts, the Project's land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. The Project would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM₁₀ and PM_{2.5} would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. As shown in **Table 4.3-4**, Project operation daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance. Therefore, the Project's

²⁹ DKA Planning 2020 based on CalEEMod 2016.3.2 model runs.

contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant.

Sensitive Receptors

There are several existing sensitive receptors within 500 feet of the Project Site, including but not limited to:

- Multi-family residences, 550 Palos Verdes, 60 feet north of the Project Site.
- The Vue Apartments, 255 West 5th Street, 300 feet northwest of the Project Site.
- La Salle Lofts, multi-family residences, 255 West 7th Street, 370 feet southwest of the Project Site.
- Multi-family residences, 248 West 8th Street; 410 feet southwest of the Project Site.
- Multi-family residences, 225-229 West 8th Street; 430 feet southwest of the Project Site.
- Centre Street Lofts, multi-family residences, 285 West 6th Street; 420 feet west of the Project Site.

Construction

For construction, pollutant concentrations are compared to significance thresholds for particulates (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂) and carbon monoxide (CO). The significance threshold for PM₁₀ represents compliance with SCAQMD Rule 403 (Fugitive Dust). The threshold for PM_{2.5} is designed to limit emissions and allow progress toward attainment of the ambient air quality standard. Thresholds for NO₂ and CO represent the allowable increase in concentrations above background levels that would not cause or contribute to an exceedance of their respective ambient air quality standards. In consideration of the above referenced guidance, a Localized Significance Threshold (LST) analysis was prepared.

A maximum PM₁₀ concentration of 8.63443 mg/m³ was predicted. This value does not exceed the SCAQMD significant threshold of 10.4 mg/m³. The maximum concentration for PM_{2.5} was predicted to be 6.03327 mg/m³. This value does not exceed SCAQMD's significance threshold of 10.4 mg/m³.

For NO₂, a maximum one hour concentration of 0.07778 ppm (146.33353 mg/m³) was predicted. This concentration, when added to a background concentration of 0.0895 ppm, will not cause an exceedance of the California Ambient Air Quality Standards (CAAQS) of 0.18 ppm.

The maximum modeled 1-hour average concentration for CO of 0.17883 ppm (204.79740 mg/m³) when added to an existing background concentration of 4.7 ppm, will not cause an exceedance of the CAAQS of 20 ppm. For the 8-hour averaging time, the maximum predicted

concentration of 0.07775 ppm, (89.04112 mg/m³) when added to an existing background level of 2.6 ppm, does not cause an exceedance of the CAAQS of 9 ppm.

Results of the LST analysis (included in **Appendix B-2** to this Addendum) indicate that maximum pollutant concentrations are predicted to be within acceptable limits for each proposed construction phase and are not anticipated to exceed identified significance thresholds at any receptor location.

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project site exceeded the applicable LST values, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5} to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in **Table 4.3-3**, during construction of the Project, maximum daily localized emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project site would remain below each of the respective LST values. Maximum daily localized emissions would not exceed any of the localized standards for receptors that are generally within 25 meters (82 feet) of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site residential locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 30 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less-than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

The Project Site would be developed with land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).³⁰

The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.³¹ Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

However, on April 12, 2018, the City updated its guidance on siting land uses near freeways, resulting in an updated Advisory Notice effective September 17, 2018 requiring all proposed projects within 1,000 feet of a freeway adhere to the Citywide Design Guidelines, including those that address freeway proximity. Requirements for preparing HRAs were removed.

As part of the Clean Up Green Up initiative, on April 26, 2016, City Council amended Articles 5 and 9 of Chapter IX of the LAMC addressing sources of outside air in buildings and requiring all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13 (Ordinance 184,245).³²

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing

³⁰ CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

³¹ SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

³² ZI-2427 freeway adjacent advisory notice for sensitive uses <http://zimas.lacity.org/documents/zoneinfo/zi2427.pdf>

mobile source diesel emissions.³³ Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions (freezing temperatures), neither of which applies to this Project area, which is in a temperate climate of Southern California. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.³⁴

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.³⁵ However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.³⁶ The

³³ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

³⁴ Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

³⁵ California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. [www.http://oehha.ca.gov/public_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html)

³⁶ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts would be less than significant.

Odors

The Project will introduce residential and commercial uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be less than significant.

Conclusion

As demonstrated above, the Project would result in less than significant impacts related to air quality during both construction and operation. The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to air quality, the Project would nevertheless implement Mitigation Measures MM4.2-1 and MM4.2-3 from the Certified EIR. Project Site is not greater than 5 acres so Mitigation Measure MM4.2-2 from the Certified EIR would not apply.

MM4.2-1 is a condition of approval of all applicable discretionary projects and are best management practices for construction.

MM4.2-3 is compliance with GHG regulatory targets. Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. Consistency with the plans, policies, regulations and GHG reduction actions/strategies would reduce Project's incremental contribution of GHG emissions. Therefore, Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions.

Environmental Standards

The Project would implement Environmental Standards AQ1 and AQ3/GHG1 from the CPIO. Project Site is not greater than 5 acres so Environmental Standard AQ2 from the Certified EIR would not apply.

AQ1 is the same as MM4.2-1 and are best management practices for construction.

Per AQ3/GHG1 C., 5% of total parking stalls shall be Electric Vehicle Supply Equipment (EVSE) capable.

4.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Instead, the Project impacts with respect to air quality were determined to be less than significant, which is less than the significant and unavoidable impacts identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe air quality impacts than what was analyzed in the Certified EIR.

4.3.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to air quality. No substantial changes in the environment have occurred since certification of the EIR, and no substantial new air quality impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.3.5 EIR's Mitigation Measures Addressing Impacts

As stated above, the Certified EIR provided Mitigation Measure MM4.2-1 to address impacts with respect to air quality during the construction of specific projects. While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to air quality, the Project would nevertheless implement Mitigation Measure MM4.2-1 from the Certified EIR. By way of regulatory compliance with the LAMC and consistency with plans, policies, regulations and GHG reduction actions/strategies, the Project would implement Mitigation Measure MM4.2-3 from the Certified EIR.

The Project would also comply with Environmental Standards AQ1 and AQ3/GHG1 from the CPIO.

4.3.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to air quality would occur as a result of the Project. Therefore, the impacts to air quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.4 Biological Resources

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	No
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	No
(c) Have a substantial adverse effect on state or federally-protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	No
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less Than Significant	No	No	No	No
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	No	No
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No	No	No

This section is based in part on the Certified EIR and the following item, which is included as **Appendix C** to this Addendum:

C City of Los Angeles Tree Evaluation, Arborgate Consulting, April 22, 2020

4.4.1 Impact Determination in the Certified EIR

The Certified EIR stated that though the majority of the CPA currently includes residential, industrial, commercial, and other urban development, some natural habitat areas still exist. These habitats are located primarily in open space areas located within the southern portion of the CPA (i.e., White Point Park, Royal Palms State Beach, and Point Fermin Park), and support coastal sea bluff scrub, coastal sage scrub, and annual grassland habitats. Such habitats have the potential or are known to currently or historically support sensitive plant and animal species.

Any discretionary projects proposed under the CPA and implementing ordinances would be subject to environmental review under CEQA. As part of the environmental review process, surveys for sensitive plant or animal species as required by federal, state, and local regulations would be undertaken when suitable habitat for such species is present to minimize potential adverse impacts to these species. In addition, existing GPF and Conservation Element policies would also help avoid and minimize potential adverse impacts to sensitive species. Conservation Element policies related to Endangered Species (Policies 1, 2, and 3) and Habitats (Policies 3 and 4) call for the evaluation, avoidance, and protection of impacts to sensitive plant and wildlife species.

Compliance with federal, state, and local regulations and compliance with any terms and conditions within those permits, issued by the state or federal resource agencies, are designed to offset impacts to sensitive plant and wildlife species and their habitats would reduce adverse effects on sensitive species. This impact is considered less than significant, and no mitigation is required.

One sensitive natural community, Coastal Seabluff Scrub, is recorded along the southern boundary (coastal cliff areas) of the CPA. In addition, sensitive wetland and water habitats could be present in the northern portion of the CPA within Peck's Park, Rena Park, and Leland Park, and the southwestern portion of the CPA in Friendship Park, Bogdanovich Park, and Averill Park. Compliance with federal, state, and local regulations, and the existing General Plan policies and goals, are designed to protect sensitive natural communities and special status species and/or their habitat. The impact is less than significant

Areas where development and infrastructure projects are likely to occur as a result of the proposed plan and implementing ordinances are primarily in the eastern portion of the CPA, with smaller change areas distributed throughout the CPA. These areas are currently developed with residential, industrial, and commercial uses and are densely populated; therefore, these portions of the CPA do not act as a major wildlife corridors or native wildlife nursery sites, movement pathways, or linkages between large habitat areas for terrestrial wildlife. Impacts to wildlife movement resulting from the proposed plan and implementing ordinances would be limited to small, fragmented areas that are isolated by urban development and would be expected to support common wildlife species that are adapted to highly urbanized areas. Environmental review would be required under CEQA for any discretionary project that could

impact movement of native resident or migratory wildlife species or impeded the use of native wildlife nursery sites. Compliance with federal and state regulations related to the protection of migratory fish and wildlife species, and compliance with General Plan policies that protect wildlife habitat linkages and corridors (Conservation Element, Habitat Policies 1 and 2 and General Plan Framework Policies 6.1.2 and 6.1.5), would ensure this impact remains less than significant.

Mitigation Measures

No impacts related to biological resources were determined for the Community Plan, and no mitigation measures were required.

4.4.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in the Certified EIR, existing General Plan Framework and Conservation Element policies would also help avoid and minimize potential adverse impacts to sensitive species. Conservation Element policies related to Endangered Species (Policies 1, 2, and 3) and Habitats (Policies 3 and 4) call for the evaluation, avoidance, and protection of impacts to sensitive plant and wildlife species.

No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.³⁷ Therefore no impact would occur.

No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is at the San Pedro Main Channel (to the LA Harbor) classified as Estuarine and Marine Deepwater and located approximately 600 feet east from the Project Site.³⁸ Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a state or federally protected wetland. Therefore no impact would occur.

Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the project area. Therefore no impact would occur.

There are 27 street trees (8 on 6th, 7 on Beacon, 6 on 7th, and 6 on Palos Verdes) and 47 onsite trees.³⁹ None is a protected species. The Project would remove all 47 onsite trees, as they would be within the zone of construction. The Project would also remove the 27 street trees and replace with 40 street trees. Any tree removal will comply with the City's Tree Replacement Program (including Urban Forestry Division, Bureau of Street Services for the street trees). The Project would not impact any protected trees. Therefore, no impact would occur.

³⁷ USFWS, Wetlands Inventory, Riparian Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed March 23, 2020.

³⁸ U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed March 23, 2020.

³⁹ [City of Los Angeles Tree Evaluation](#), Arborgate Consulting, April 22, 2020.

Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site. There are no City or county significant ecological areas.⁴⁰ The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. Therefore no impact would occur.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.4.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment related to biological resources have occurred since certification of the EIR, and no substantial new biological resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.4.5 Mitigation Measures Addressing Impact

Because the Certified EIR determined the Approved Project would have less than significant impacts on biological resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.4.6 Conclusion

Based on the above, no new significant impacts to biological resources or a substantial increase in previously identified biological resource impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

⁴⁰ Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>.

4.5 Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant	No	No	No	No
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	No	No	No	No

This section is based in part on the Certified EIR and the following item, which is included as **Appendix D** to this Addendum:

D Archaeology Response, South Central Coastal Information Center, September 17, 2020

4.5.1 Impact Determination in the Certified EIR

Historic Resources

There are 26 identifiable designated historical resources, including historic districts, in the San Pedro CPA. The historic districts include the Fort MacArthur Middle Reservation, which is listed in the National Register of Historic Places (NRHP); Downtown San Pedro, which is considered eligible for inclusion in the NRHP and listed in the California Register of Historical Resources (CRHR); and Vinegar Hill, which is an Historic Preservation Overlay Zone (HPOZ). Additional buildings are considered historical resources, in that they are listed in the NRHP, CRHR, as Los Angeles Historic-Cultural Monuments (HCMs), or a combination of these registers of significant resources. The proposed plan and implementing ordinances contain policies that would minimize impacts to historical resources. These policies promote the protection and preservation of the existing character of neighborhoods and do not directly propose changes to designated historical resources.

Development activities have the potential to cause a substantial adverse change in the significance of an historical resource through demolition or alteration of a historical resource's physical characteristics that convey its historical significance. This could include the potential for development activities to result in the demolition of a significant resource; the relocation of a

significant resource that diminishes its integrity; or the conversion, rehabilitation, alteration, or other construction associated with a significant resource that reduces the integrity of important resources within a particular project site or in the vicinity. However, General Plan and Community Plan policies, as well as guidelines in the Downtown CDO, protect significant historical resources. Further, all discretionary projects would be subject to environmental review with the provisions of the LAMC, which further protects historical resources. Therefore, compliance with existing regulations ensures the impact to historical resources from implementation of the proposed plan and implementing ordinances is less than significant.

Archaeological Resources

As stated in the Certified EIR, the South Central Coast Information Center (SCCIC) records search identified numerous archaeological resources within the CPA, and the lands adjacent to the CPA boundaries. These resources are predominantly prehistoric-age archaeological sites of varying sizes, exhibiting prehistoric-age material culture through scatters of tools, as well as habitation sites exhibiting shell debris, known as midden. The Native American Heritage Commission (NAHC) response letter indicated that no Native American cultural resources have been recorded within the CPA; however, the NAHC noted that its files are not exhaustive and the results of the searches do not preclude the presence Native American resources. Two responses were received from local Native American organizations indicating that the CPA contained a named Gabrielino village site and was considered highly culturally sensitive. Based upon the presence of a named village site, as well as the frequency of known and recorded archaeological sites throughout the CPA, the CPA is considered to have high sensitivity for significant archaeological resources within previously undisturbed soils. Under CEQA, public agencies must consider the effects of their actions on “unique archaeological resources.” There is potential that the proposed plan could result in new development or ground-disturbing activities in areas containing known or previously undetected archaeological resources. However, compliance with applicable regulations would ensure that this impact remains less than significant.

Human Remains

There is one known formal cemetery within the CPA, Harbor View Memorial Park (formerly San Pedro Cemetery). No changes are proposed to this cemetery. Although the potential to disturb any human remains interred outside of formal cemeteries within the CPA is considered low; given the level of past human activity, it is possible that unknown human remains could be located with the CPA and that future development could encounter these remains (if present within the subsurface). In the event of the inadvertent discovery or recognition of any human remains during future, project-related ground disturbance, Section 7050.5 of the California Health and Safety Code states that, if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Section 5097.98 outlines the NAHC notification process and the appropriate

procedures if the County Coroner determines the human remains to be Native American. Compliance with applicable regulations would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant.

Mitigation Measures

No impacts related to cultural resources were determined for the Community Plan, and no mitigation measures were required.

4.5.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Historic Resources

The Project Site is developed with commercial and office uses and a surface parking lot. These buildings were constructed in 1978 and are not old enough to be considered as historic resources. According to ZIMAS, the Project Site does not require historic preservation review.⁴¹

Three resources in the area have been listed as LA Historic Cultural Monuments (HCM):⁴²

- San Pedro Municipal Building (638 Beacon Street), HCM-732, 60 feet east of the Site across Beacon Street.
- USS Los Angeles Naval Monument (John. S Gibson Jr. Park), HCM-188, 300 feet northeast of the Site across Harbor Boulevard
- Municipal Ferry Building, HCM-146, 500 feet northeast of the Site across Harbor Boulevard

San Pedro Main Post Office (839 Beacon Street) has been listed on the National Register of Historic Places, but not listed as an LA HCM.⁴³

The Project would not introduce incompatible visual elements and would not affect views of any of the historic resources. The Project would not cause any substantial change in the immediate surroundings such that the significance of the historical resources would be materially impaired. Therefore, impacts would be less than significant.

Archaeological Resources

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project

⁴¹ HistoricPlacesLA: <http://www.historicplacesla.org/map>, accessed March 23, 2020.

⁴² SurveyLA: <https://planning.lacity.org/preservation-design/survey-la-results-san-pedro>, accessed March 23, 2020.

⁴³ HistoricPlacesLA: <http://www.historicplacesla.org/reports/905572f3-59b1-4f85-b71c-fe825b2b7943>, accessed March 23, 2020.

would require excavation for subterranean levels for parking, mechanical uses, utility and foundation work, and grading.

The South Central Coastal Information Center (SCCIC) records search shows no archaeological resources within the Project area. However, this may simply mean that the area has not been studied and/or that no information regarding the archaeological sensitivity of the property has been filed at the SCCIC. The reported records search result does not preclude the possibility that surface or buried artifacts might be found during a survey of the property or ground-disturbing activities.

The archaeological sensitivity of the project location is unknown because there are no previous studies for the Project Site. Additionally, the natural ground-surface appears to be obscured by urban development; consequently, surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the project area, buried resources could potentially be unearthed during project activities.

Therefore, customary caution and a halt-work condition should be in place for all ground-disturbing activities. In the event that any evidence of cultural resources is discovered, all work within the vicinity of the find should stop until a qualified archaeological consultant can assess the find and make recommendations. Excavation of potential cultural resources should not be attempted by project personnel.⁴⁴

Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

Human Remains

The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project would require excavation for subterranean levels for parking, mechanical uses, utility and foundation work, and grading. No known traditional burial sites have been identified on the Project Site.

If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, work will stop immediately and the County Coroner will be contacted. If the remains are determined to be of Native American

⁴⁴ Archaeology Response, South Central Coastal Information Center, September 17, 2020

descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendant may request mediation by the NAHC. Therefore, impacts would be less than significant.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.5.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since certification of the EIR, and no substantial new cultural resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.5.5 Mitigation Measures Addressing Impact

Because the Certified EIR determined the Approved Project would have less than significant impacts on cultural resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.5.6 Conclusion

Based on the above, no new significant impacts to cultural resources or a substantial increase in previously identified cultural resource impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.6 Energy

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant with Mitigation	No	No	No	Yes
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant with Mitigation	No	No	No	Yes

This section is based in part on the Certified EIR and the following item, which is included as **Appendix E** to this Addendum:

E Energy and Fuel Calculations, CAJA Environmental, April 2020

4.6.1 Impact Determination in the Certified EIR

The CPA is served by the Harbor Receiving Station located at 150 Island Avenue and has an ultimate firm capacity of 400 MVA. The LADWP routinely plans capacity additions and changes at existing and new facilities as needed to supply area load.¹⁹⁸ Implementation of the proposed plan would increase the use of electricity within the CPA, to light, heat, and air condition the future development under the proposed plan. Based on the information provided in the Certified EIR, the total annual electricity consumption by the proposed plan is estimated to be approximately 265,929,353 kWh/year, or an increase of 11,684,446 kWh/year over existing demand.

Existing General Plan Framework Element Policies 9.26.1, 9.27.1, 9.28.1 through 9.28.3, 9.29.1 through 9.29.6, and 9.30.1 address how LADWP serves the City of Los Angeles with power, promotes responsible use of natural resources, conservation, and energy efficiency. These policies would apply to existing and proposed discretionary development in the CPA. In addition, mitigation measure MM4.14-3 would apply to future development in the CPA. Finally, future development occurring under the CPA would be required to comply with Title 24 of the CCR requiring building energy efficiency standards. Therefore, impacts are less than significant.

The entire CPA is within the service territory of SoCalGas, which operates a natural gas distribution system in the area currently, and is capable of expanding the system by providing gas service to the planned area without disruption to the existing system. Maps of the

distribution systems infrastructure are proprietary information and, as such, are not available. Adequate gas supplies exist to provide service to the CPA. If new or extended natural gas lines are required to serve future development, such infrastructure would be located underground and would be constructed in accordance with SCGC's policies and extension rules on file with the CPUC at the time contractual agreements are made. Any new infrastructure would be determined on a project-by-project basis.

Based on the information provided in the Certified EIR, the total annual natural gas consumption resulting from reasonably expected capacity of the proposed plan is estimated to be approximately 1,965,016,561 MMcf/year or increase of 291,719,086 MMcf/year over existing uses.

Existing GPF Element Policies 9.29.2 through 9.29.4 promote responsible use of natural resources, conservation, and energy efficiency, especially in development of industrial uses. These policies would apply to existing and proposed discretionary development in the CPA. In addition, mitigation measure MM4.14-3 would apply to future development requiring discretionary approval in the CPA. Finally, future development under the proposed plan would be required to comply with Title 24 of the CCR requiring building energy efficiency standards. Because the natural gas demand projected for reasonably expected capacity of the proposed plan would not exceed available or planned supply, new infrastructure would not be required to serve the CPA, other than localized connections and improvements, which would not be anticipated to have significant environmental impacts. Therefore, this impact is less than significant.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to energy:

MM4.14-3 The CPIO District shall include regulations that incorporate energy conservation and efficiency measures into the design of new development, including but not limited to:

- energy saving windows, doors, insulation and passive solar design;
- energy efficient fixtures and appliances;
- efficient lighting, heating, air and ventilation systems;
- reused or recycled building materials.

Environmental Standards

The following environmental standard was included in CPIO to reduce impacts related to energy:

US3 Projects shall incorporate energy conservation and efficiency measures into the design of new development, including but not limited to:

- a. Energy saving windows, doors, insulation and passive solar design;
- b. Energy efficient fixtures and appliances;
- c. Efficient lighting, heating, air and ventilation systems;
- d. Reused or recycled building materials.

4.6.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Construction

As shown in **Table 4.6-1** approximately 2,062 kWh of electricity, 218,722 gallons of gasoline, and 94,000 gallons of diesel are estimated to be consumed during Project construction.

**Table 4.6-1
Summary of Energy Usage During Construction**

Energy Type	Quantity
Electricity	
Water Consumption	2,062 kWh
Lighting, equipment and other construction activities needing power	N/A ¹
Total Electricity	2,062 kWh
Transportation - Gasoline	
On-Road Construction Equipment (Worker)	218,722 gallons
Off-road Construction Equipment	0
Total Gasoline	218,722 gallons
Transportation - Diesel	
On-Road Construction Equipment (Vender + Haul)	58,069 gallons
Off-road Construction Equipment (Equipment)	35,931 gallons
Total Diesel	94,000 gallons
Water application rate= 3,020 gal/acre/day kWh equivalent= 0.009727 kWh 1) Gallons per year of water usage for dust control is calculated based on a minimum control efficiency of 66% (three times daily) with an application rate of 3,020 gal/acre/day (Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition)) and average of 25 construction days per month. 2) CalEEMod Default: Each gallon of delivered potable water in Southern California is associated with 0.009727 kWh of electricity. ¹ Electricity usage associated with this line item is not easily quantifiable. Such electricity demand would be temporary, limited, and would cease upon the completion of construction. Detailed calculations in Appendix E to the Addendum. Table: CAJA Environmental Services, April 2020.	

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Approximately 2,062 kWh of electricity⁴⁵ would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures would be consumed during Project construction. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources are expected to consumed 3.975 billion gallons of gasoline and 0.643 billion gallons of diesel fuel in 2020.⁴⁶ For comparison purposes, the fuel usage during Project construction would represent approximately 0.0055 percent of the 2020 annual on-road gasoline-related energy consumption and 0.01 percent of the 2020 annual diesel fuel-related energy consumption in Los Angeles County. Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))⁴⁷ to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation

⁴⁵ Calculation included in the appendices to this Addendum and based on AQ Calcemod modeling data and assumptions on construction provided in the Project Description.

⁴⁶ California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/, accessed March 2020.

⁴⁷ California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>

will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

As shown in **Table 4.6-2**, the Project's new energy demand would be approximately 261 MWh of electricity per year, 0.78 million cubic feet of natural gas per year, 211,719 gallons of gasoline per year, and 52,631 gallons of diesel fuel per year.

**Table 4.6-2
Summary of Energy Usage During Operation**

Land Use	Total
Electricity in kWh per year	
Residential	111,278
Retail	31,266
Parking Structure	118,372
Total Electricity	260,916
Natural Gas in kBTU per year	
Residential	709,578
Retail	104,061
Parking Structure	0
Total Natural Gas	813,639 (784,608 cf)¹
Transportation Petroleum-Based Fuel in gallons	
Gasoline	211,719
Diesel	52,631
Total	264,350
kWh = kilowatt-hour kBTU = 1,000 British thermal units ¹ The conversion of kBTU to cubic feet (cf) uses the following factor: 1 cf = 1.037 kBTU Electricity and natural gas use is estimated from CalEEMod 2016.3.2 model sheets, included as Appendix B to the Addendum. Transportation fuel is estimated based on VMT from VMT calculator, included as Appendix I to the Addendum. Table: CAJA Environmental Services, April 2020.	

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the

construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment.

Currently, the LADWP is able to supply over 7,640 mw of generation capacity with the highest recorded peak being 6,396 mw.⁴⁸ Peak demand is expected to grow from 5,872 mw in 2020-2021 (baseline year) to 5,976 mw in 2023-2024 (future operation year).⁴⁹ Despite these growth projections, they would still not exceed the existing capacity of 7,880 mw. The Project-related net increase in annual electricity consumption would be accommodated within LADWP's projected sales in 2024. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.⁵⁰ It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG capacity in 2020 (baseline year) is estimated at 3,775 million cf/day and by 2024 (future operation year) is estimated at 3,775 million cf/day. The Project's natural gas demand represents approximately 0.002 percent of the capacity available. Thus, there is adequate supply capacity and no impacts would occur.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure would occur.

⁴⁸ LADWP https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afLoop=86275907941327, accessed May 12, 2017.

⁴⁹ 2017 Power Strategic Long-Term Resource Plan, Appendix A, Load Forecasting: https://www.ladwp.com/ladwp/faces/wcnave_externallid/a-p-doc?_adf.ctrl-state=hzh17ej_4&_afLoop=49898701833644

⁵⁰ LADWP Rules Governing Water and Electric Service: [http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/\\$FILE/Rule%2016-d.pdf](http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf)

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Site, Project impacts related to natural gas would be less than significant.

The Project will implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

The Project will comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

The Project will comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

Therefore, because of energy efficient design, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Project Site, Project impacts related to natural gas would be less than significant.

Transportation Energy Demand

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the state's total transportation fuel consumption. Based on the Project's estimated 4,327,440 vehicle miles traveled (VMT)⁵¹, and assuming the Project's mix of vehicle types (automobiles, trucks, and

⁵¹ See VMT Calculator. Based on a worse-case pre-mitigation daily VMT of 11,856 x 365 days = 4,327,440

motorcycles), approximately 211,719 gallons of fuel would be required in a year. By comparison, California consumes approximately 26 billion gallons of petroleum per year. The anticipated increase in consumption associated with one year of Project operation is 0.00001 percent of the statewide use. Additionally, alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. Impacts related to petroleum consumption, during operation of the Project, would be less than significant.

Energy Conservation

The Project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would incorporate a variety of water conservation features required by the LAMC that would also promote energy conservation.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SCG, respectively. Use of petroleum-based fuels during construction and operation would also be minimized.

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to energy, the Project would nevertheless implement Mitigation Measure MM4.14-3 from the Certified EIR.

Compliance with the City's Green Building Program would ensure that the proposed development promotes energy conservation and efficiency and possibly exceed the State standards.

Per CPIO Appendix A (AQ3/GHG1 C.), 5% of total parking stalls shall be Electric Vehicle Supply Equipment (EVSE) capable.

The proposed development would comply with the City's environmental policies for the responsible use of natural resources.

Environmental Standards

The Project would implement Environmental Standard US3 from the CPIO.

US3 is the same as MM4.14-3.

Compliance with the City's Green Building Program would ensure that the proposed development incorporates energy-efficient windows, doors, insulation, fixtures and appliances, and lighting, heating, air and ventilation systems. Project would reuse or recycle building materials to the extent feasible.

4.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.6.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to energy. No substantial changes in the environment related to energy have occurred since certification of the EIR. Finally, as it has been determined the Project will not result in any significant energy impacts, a review of feasible mitigation measures is not required.

4.6.5 Mitigation Measures Addressing Impact

As stated above, the Project would implement Mitigation Measure MM4.14-3 from the Certified EIR.

The Project would also comply with Environmental Standard US3 from the CPIO.

4.6.6 Conclusion

Based on the above, no new significant impacts to energy or a substantial increase in previously identified energy impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.7 Geology and Soils

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:					
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less Than Significant	No	No	No	No
(ii) Strong seismic ground shaking?	Less Than Significant	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	Less Than Significant	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant	No	No	No	No
(d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant	No	No	No	No
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix F** to this Addendum:

- F-1** Geotechnical Investigation, Geotechnical Professionals, March 9, 2020
- F-2** Soils Report Review Letter, Los Angeles Department of Building and Safety, April 15, 2020
- F-3** Geotechnical Response, Geotechnical Professionals, April 20, 2020
- F-4** Soils Report Approval Letter, Los Angeles Department of Building and Safety, May 26, 2020
- F-5** Paleontology Response, Natural History Museum of Los Angeles County, May 13, 2020

4.7.1 Impact Determination in the Certified EIR

Earthquake Faults

There are no CGS-classified Earthquake Fault Zones (EFZs) subject to special study under the Alquist-Priolo Act within the boundary of the San Pedro CPA. However, the Palos Verde fault is identified in the City of Los Angeles Safety Element as a Fault Rupture Study Area. This fault is still being studied by the state and the City, and it has not been classified as an Alquist-Priolo EFZ by the state. A seismic event along a fault zone, regardless of whether it is classified by the state as an EFZ, could have the potential to cause surface ground rupture, thereby exposing people or structures in the CPA to substantial geologic hazards, which could contribute to the risk of loss, injury, or death. Compliance with the California Building Code (CBC), City's Codes, and applicable regulatory requirements would ensure that the proposed plan and all development therein would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury as a result of fault rupture. This impact is less than significant.

Seismic Groundshaking

Compliance with the CBC, City Codes, and related applicable regulatory requirements, which would be within the jurisdiction of the City to ensure and monitor, would ensure that the proposed plan and all development therein would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury as result of strong seismic groundshaking. This impact is less than significant.

Liquefaction

Liquefaction-prone areas are primarily limited to the northern portion of the CPA along Gaffey Street north of Miraflores Avenue, north of Westmont Drive, and west of I-110. Small portions of liquefaction zones also occur along Harbor Boulevard north of 7th Street, at Cabrillo Beach, and along the coastline west of White Point Park/Royal Palms State Beach. Compliance with the CBC, City's Codes, and applicable regulatory requirements described above would ensure that the potential risk of loss, injury, or death due to liquefaction is less than significant.

Landslide

Earthquake-induced landslide hazards zones are mainly located in the hilly areas in the northern portion of the CPA east of Gaffey Street, near Capitol and Park Western Drives and open space areas to the south of those streets, and western and southern areas of the CPA particularly near the coastal cliffs. The central portion of San Pedro, including the business and harbor areas, is not located within a landslide hazard area. It is the City's standard practice to require the preparation, review, and approval of geotechnical reports for new developments in landslide susceptible areas. Compliance with the recommendations of the geotechnical report, the City's Building and Grading Codes, as well as with any specific requirements established by the Department of Public Works and/or the City Engineer would mitigate landslide-related hazards. This impact is less than significant.

Erosion

Compliance with state National Pollutant Discharge Elimination System (NPDES) permit, City's Codes, and applicable regulatory requirements, in combination with the City's standard grading and building permit requirements and the application of Best Management Practices, would ensure that potential impacts from erosion are less than significant.

Unstable Soils

Implementation of the City's Codes that implement the CBC in combination with the City's standard grading and building permit requirements and the application of Best Management Practices would reduce impacts from unstable soils to less than significant.

Expansive Soils

Implementation of the City's Codes and regulatory requirements, in combination with the City's standard grading and building permit requirements and the application of Best Management Practices, would reduce impacts from expansive soils to less than significant.

Septic System

It is the City's policy that all new development must be connected to a public sewerage system. All portions of the CPA are either currently being served by a public sewerage system and the proposed plan and implementing ordinances do not propose any development in areas not served by sewer service. There is no impact, because no new development in the CPA would utilize septic tanks.

Geologic Features

Development in most of the hilly areas would be minimal because the areas not designated Open Space are designated as Single-Family Residential and Public Facilities, which would not involve extensive land alteration. The San Pedro Coastal Land Use Plan and Specific Plan designate coastal bluff and hill slope areas to be preserved as Open Space. Development, if

any, in the Open Space areas would be subject to the provisions of the San Pedro Coastal Land Use Plan. Objective 6 of the Land Use Plan, in particular, and Policies LU1.2 and LU18.1 seek to preserve scenic views and improve the visual environment of the Community through the protection of its natural features, topography, and coastline. For those reasons, implementation of the proposed plan and implementing ordinances would not destroy, permanently cover, or materially and adversely modify distinct and prominent geologic or topographic features. This impact is less than significant, and no mitigation measures are required.

Paleontological Resources

The CPA is known to have high paleontological sensitivity in sedimentary rock that has been uplifted, eroded, or otherwise exposed. In addition, quaternary alluvial fan deposits, such as those found in the CPA, are considered to have high paleontological sensitivity because they are known to contain significant fossil resources. There is potential that implementation of the proposed plan could result in new development or ground-disturbing activities in areas containing known or previously undetected paleontological resources. However, compliance with applicable regulations would ensure this impact remains less than significant.

Mitigation Measures

No impacts related to geology and soils were determined for the Community Plan, and no mitigation measures were required.

4.7.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Earthquake Faults

The Site is not located within an Alquist-Priolo Earthquake Fault Zone.⁵² The Site is not located within a City of Los Angeles Preliminary Fault Study Area. The Palos Verdes Preliminary Fault Study Area is located 1.75 miles north of the Site.⁵³ There are no known active faults crossing or projecting through the Site. Therefore, ground rupture due to faulting is considered unlikely at this Site.⁵⁴ Therefore, impacts would be less than significant.

Seismic Groundshaking

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building

⁵² ZIMAS search: <http://zimas.lacity.org/>.

⁵³ Navigate LA, Geotechnical Layer: <http://navigatela.lacity.org/navigatela/>.

⁵⁴ Geotechnical Investigation, Geotechnical Professionals, March 9, 2020.

Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

The Site is not within an earthquake fault zone or seismic hazards zone.⁵⁵ The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts would be less than significant.

Liquefaction

The Site is within a liquefaction zone.⁵⁶ According to the City of Los Angeles ZIMAS mapping system the Project Site is classified within an area susceptible to liquefaction.⁵⁷ According to the General Plan Safety Element, the Project Site is within a liquefaction area.⁵⁸

The northern portion of the Site is located within an area mapped by the State of California as having a potential for soil liquefaction. An historical high groundwater depth of 10 feet has been determined by the state. Groundwater was encountered at depths of 24 to 31 feet below existing grades immediately after drilling in recent explorations. The potential for liquefaction was evaluated using the methods presented by the 2008 Idriss and Boulanger methodology and modifications provided in Special Publication 117A (CGS, 2008). Based on the results of the analysis, seismic settlements on the order of 1 to 2 inches can be expected at the central portions of the site in the event of a design earthquake within layers of soils between the depths of approximately 25 to 45 feet. Differential seismic settlement is expected to be on the order of 1/2 to 1 inch. In the northern quarter of the site, the soft clays in the hydraulic fills above dense sands are not anticipated to liquefy due to relatively high plasticity. In the southern quarter of the site, the sands and silty sands are not anticipated to liquefy due to their dense nature.⁵⁹

The Project will comply with design criteria provided in the Geotechnical Investigation including the Uniform Building Code Section 1804.5 (Liquefaction Potential and Soil Strength Loss). Therefore, impacts would be less than significant.

Landslide

The Site is not within a landslide zone.⁶⁰ The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.⁶¹ The General Plan Safety Element does not identify any area around the Project Site as a bedrock or probable bedrock landslide area.⁶² Therefore, no impacts would occur.

⁵⁵ CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁵⁶ CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁵⁷ ZIMAS search: <http://zimas.lacity.org/>.

⁵⁸ Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, March 24, 2020.
Geotechnical Investigation, Geotechnical Professionals, March 9, 2020.

⁶⁰ CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁶¹ ZIMAS search: <http://zimas.lacity.org/>.

⁶² Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, March 24, 2020.

Erosion

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Appropriate erosion control and drainage devices per the LAMC Section 91.7013 shall be provided to the satisfaction of the LADBS. Therefore, construction impacts would be less than significant.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structures; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts would be less than significant.

Unstable Soils

Seismically-induced settlement or compaction of dry or moist, cohesion-less soils can be an effect related to earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Due to the undocumented fills and potentially liquefiable soils, a deep foundation system supporting the columns and a structural floor slab are recommended for the proposed structure.⁶³ Therefore, impacts would be less than significant.

Expansive Soils

The moisture content of the on-site soils expected at the bottom of the basement level are anticipated to be very moist to wet. The soft clays anticipated at the northern portion of the building may be unstable when subjected to construction activities. Stabilization of a significant portion of the excavation bottom using aggregate base/geogrid or cement treatment may be required to support heavy construction equipment.⁶⁴

The Project would comply with the recommendations and conditions in the Geotechnical Investigation. This would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts would be less than significant.

Geologic Features

With regard to unique geologic features, there are no distinct and prominent geologic or topographic features (i.e. hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, impacts would be less than significant.

Paleontological Resources

⁶³ Geotechnical Investigation, Geotechnical Professionals, March 9, 2020.

⁶⁴ Geotechnical Investigation, Geotechnical Professionals, March 9, 2020.

To address potential impacts to paleontological resources, formal record searches were conducted by the Natural History Museum of Los Angeles County (NHM) to assess the paleontological sensitivity of the Project Site and vicinity. The NHM does not have any vertebrate fossil localities that lie directly within the Project area boundaries, but does have localities nearby from the same sedimentary deposits that occur in the Project area.

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.7.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.7.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment related to geology and soils have occurred since certification of the EIR, and no areas that are susceptible to geology and soil impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.7.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have less than significant impacts on geology and soils resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.7.6 Conclusion

Based on the above, no new significant geology and soils impacts or a substantial increase in previously identified geology and soils impacts would occur as a result of the Project. Therefore, the impacts to geology and soils as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162.

4.8 Greenhouse Gas Emissions

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
GREENHOUSE GAS EMISSIONS:					
Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	No	No	No	Yes
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	No	No	No	Yes

This section is based on the Certified EIR and the following item, which is included as **Appendix B** to this Addendum:

B-1 Air Quality and GHG Report and Appendices, DKA Planning, April 2020

4.8.1 Impact Determination in the Certified EIR

Implementation of the San Pedro Community Plan would generate greenhouse gases through the construction and operation of new residential, commercial, and industrial uses. Greenhouse gas emissions from development under the proposed plan would specifically arise from project construction and from sources associated with project operation, including direct sources such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources such as electricity generation. Emissions from these operational sources are estimated. Following the SCAQMD recommendations, construction emissions would be amortized over an anticipated 30-year structure lifetime and added to the operational emissions to provide a complete average annual emissions estimate. However, because the extent of equipment use and duration of individual construction projects are unknown, emissions of greenhouse gases for construction activities cannot be determined.

GHG emissions from the construction and operation of development pursuant to the proposed plan would be reduced by 41.89 percent from business-as-usual levels and would meet the AB 32 reduction threshold with the implementation of MM4.6-1. Implementation of the Community Plan could still have a substantial adverse effect. However, any future discretionary development project pursuant to the Plan would require project level environmental clearance and would also be subject to regulations. These, coupled with mitigation measures identified in Section 4.2 (Air Quality) and the mitigation outlined below, would help reduce potential impacts from operational emissions, but not to less-than-significant level. Therefore this impact would be

considered significant and unavoidable.

The San Pedro Community Plan would result in a reduction of 41.89 percent from BAU levels. In light of the characteristics and design features as well as the identified mitigation measures, implementation of the proposed plan would comply with the goals and policies established by AB 32. However, because the greenhouse gas emissions must include emissions generated during construction, the total impact on climate change from the San Pedro Community Plan cannot be determined. This is considered a potentially significant impact. These reductions, combined with the operational reductions and implementation of MM4.6-1 would reduce impacts from construction activities, but not to a less-than-significant level. Therefore, this impact is significant and unavoidable.

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to GHG:

MM4.6-1 The CPIO District shall include regulations that require the following greenhouse gas reduction measures be incorporated into the project design:

- For non-residential projects: all outdoor lighting systems shall be directed away from the window of any residential uses and shall comply with the non-residential Light Pollution Reduction standards in the Green Building Code of the Municipal Code.
- For non-residential projects: whenever new fixtures are installed, all water closets, urinals, shower heads, faucets and dishwashers shall be High Efficiency fixtures installed in accordance with the regulations of the City's Water Conservation Ordinance.
- For Multi-family and Commercial Projects: parking facilities shall have five (5) percent of the total parking spaces, but not less than one (1) space, capable of supporting future Electric Vehicle Supply Equipment (EVSE) charging locations.

Environmental Standards

The following environmental standard was included in the CPIO to reduce impacts related to GHG:

AQ3/GHG1 Projects shall incorporate the following greenhouse gas reduction measures into the project design:

- a. For non-residential Projects: all outdoor lighting systems shall be directed away from the window of any residential uses and shall comply with the non-residential Light Pollution Reduction standards in the Green Building Code of the Municipal Code.
- b. For non-residential Projects: whenever new fixtures are installed, all water closets, urinals, shower heads, faucets and dishwashers shall be High Efficiency fixtures installed in accordance with the regulations of the City's Water Conservation Ordinance.
- c. For Multi-Family and Commercial Projects: parking facilities shall have five percent of the total parking spaces, but not less than one space, capable of supporting future Electric Vehicle Supply Equipment (EVSE) charging locations.

4.8.2 Does the Project Involve New Significant Impacts?

The Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to greenhouse gas emissions were accounted for within the analysis contained in the Certified EIR.

Consistency with Applicable Plans and Policies

The discussion below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies. The analysis provided further below (see specifically Tables 4.8-5 and 4.8-6) quantifies GHG emissions from construction and operation of the Project and addresses CEQA Guidelines question (a) regarding whether GHG emissions would directly or indirectly have a significant impact on the environment.

Statewide: Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32 that has been updated over time to reflect updated strategies.⁶⁵ In 2014, CARB approved the First Update to the Climate Change Scoping Plan, calling out key priorities for near-term 2020 emission reduction goals, and evaluating how to align the long-term term GHG goals with other resource priorities like water, waste, and transportation. Subsequently, SB 32 was approved in 2016, calling for deeper GHG emissions reductions by 2030.

⁶⁵ Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

Provided in **Table 4.8-1** is an evaluation of the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the 2008 and 2014 *Climate Change Scoping Plan*. As discussed therein, the Project would be consistent with the GHG reduction-related actions and strategies of the 2008 and 2014 *Climate Change Scoping Plan Update*.

The 2017 *Climate Change Scoping Plan* built upon those goals identified in the 2014 *Climate Change Scoping Plan Update* and addresses the 2030 horizon. It includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions.

Table 4.8-2 provides an evaluation of the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the 2017 *Climate Change Scoping Plan Update*.⁶⁶ As discussed therein, the Project would be consistent with the GHG reduction-related actions and strategies of the 2017 *Climate Change Scoping Plan Update*. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

⁶⁶ An evaluation of stationary sources is not necessary, as the stationary sources emissions will be created by emergency generators that would only be used in an emergency.

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Energy		
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.	LADWP	No Conflict. LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016. ^a As LADWP would provide electricity service to the Project Site, the Project would use electricity that is produced consistent with this performance-based standard. Electricity-related GHG emissions assume that LADWP will receive at least 33 percent of their electricity from renewable sources by 2020.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. ^b	State Energy Resources Conservation and Development Commission and LADWP	No Conflict. LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Site, the Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in 2023 and, therefore, the estimated GHG emissions from electricity usage provided herein conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions would be further reduced by 17 percent by Year 2030, as the electricity provided to the Project Site would meet the requirements under SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under the California Code of Regulations (CCR), Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation. The

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		Project would support this action/strategy because it includes compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).
Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.	State, CEC, and LADWP	No Conflict. LADWP meets the requirements of SB 1368. As LADWP would provide electricity service to the Project Site, the Project would use electricity that meets the requirements under SB 1368.
California Code of Regulations (CCR), Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	No Conflict. The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The Project would include new appliances and lighting that comply with this energy efficiency standard.
<p>CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.</p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.</p>	State and CEC	No Conflict. Consistent with regulatory requirements, the Project must comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction built to 2013 Title 24 standards. ^c The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in CARB's <i>Climate Action Scoping Plan</i> . The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the <i>Climate Action Scoping Plan</i> to reduce

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		GHG emissions.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.	Federal/ Manufacturers	Consistent. The Project would not use incandescent light bulbs, instead using bulbs that meet increasingly stringent standards for energy efficiency. As such, EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions estimates account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. ^d	State/ Manufacturers	Consistent. As with the EISA, discussed above, the Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit.	State/ Manufacturers	No Conflict. As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in State or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's electricity usage estimates would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity and would provide electricity to the Project Site) and would be consistent with AB 32 and the Climate Change Scoping Plan.

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Mobile Source Emissions		
Assembly Bill 1493 (AB 1493) “Pavley Standards”: AB 1493 requires 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. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California’s Advanced Clean Cars program (discussed below).	State, CARB	No Conflict. The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of AB 1493 into mobile source emission factors.
Executive Order S-01-07: The Low Carbon Fuel Standard requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009). ^{e,f}	State, CARB	No Conflict. GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.
Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	State, CARB	No Conflict. Standards under the Advanced Clean Cars Program would apply to all passenger and light duty trucks used by visitors, employees, and deliveries to the Project Site. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34-percent reduction in mobile source

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		emissions, as the CalEEMod model does not yet account for this regulation. The Project would further support this regulation since the Project would provide at least 20 percent of the total code-required parking spaces to be capable of supporting future electric vehicle supply equipment (EVSE), and the Project would provide at least 5 percent of the total code-required parking spaces with EV charging stations.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB Regional, SCAG	No Conflict. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate new office uses within a High Quality Transit Area (HQT). Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. As Project-related transportation emissions are reduced by approximately 30 percent, the Project would be consistent with SB 375 and the 2016-2040 RTP/SCS.
Solid Waste		
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction,	State	No Conflict. GHG emissions related to solid waste generation from the Project would benefit from this regulation, as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Project-related GHG emissions from solid waste generation include a 50-percent reduction in solid waste generation source emissions per goals of the City. The Applicant would only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>recycling, and composting facilities.^g</p> <p>AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.^h</p>		<p>In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclables.</p>
Water		
<p>CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.</p>	State	<p>Consistent. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code and reflect approximately a 20 percent reduction in water usage as compared to the base demand. Project-related GHG emissions from water-related sources accounts for compliance with water efficiency requirements. Examples of water conservation measures could include: high efficiency toilets, low flow faucets, drought tolerant plants, and drip irrigation systems. Through the inclusion of these types of water conservation measures, the Project would have an overall water use reduction of 20 percent and would meet the requirements of the California Green Building Standards.</p>
<p>Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan.</p>	State	<p>Consistent. As discussed above under Title 24, the Project would meet this performance-based standard. Water conservation measures consistent with Green Building Code requirements could include: high efficiency toilets, low flow faucets, drought tolerant plants, and drip irrigation systems. The inclusion of these types of water conservation measures that would allow the Project to achieve the reductions sought by SB X7-7 related to water conservation and</p>

Table 4.8-1
Consistency Analysis—Climate Change Scoping Plan and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.		related GHG emissions.
Construction		
CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	Consistent. The Project would use construction contractors that would comply with this regulation.
CARB In-Use On-Road Regulation: CARB's in-use on-road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.	CARB	Consistent. The Project would use construction contractors that would comply with this regulation.
^a California Energy Commission, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/ . ^b Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, Ch. 547. ^c CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards. ^d 2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534. ^e CARB, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009. ^f Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel. ^g Cal. Pub. Res. Code § 41780(a). ^h Cal. Pub. Res. Code § 41780.01(a).		

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Senate Bill 350 (SB 350):</p> <p>The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.^a</p> <p>Required measures include:</p> <ul style="list-style-type: none"> • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs. 	<p>CPUC, CEC, CARB</p>	<p>Consistent. The recently adopted SB 100 has since revised the State's renewable resources targets to 44% by 2024, 52% by 2027, 60% by 2030, and 100% by 2045. The Project would use electricity provided by LADWP, which is required to meet the SB 350 and subsequent SB 100 performance standards. LADWP has committed to achieving 50 percent renewables by 2025 and will be required to update its plans to comply with SB 100's 2030 60 percent target. LADWP has also launched the LA100 Study to determine a course for achieving a 100% renewable energy supply.</p> <p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.</p> <p>The Project would comply with this this action/strategy being located within the LADWP service area and would comply with CalGreen and Title 24 energy efficiency standards. With regard to Title 24 energy efficiency standards, the 2019 California Building Standards Code was recently published on July 1, 2019, with an effective date of January 1, 2020. Though these updated standards have yet to go into effect, they would apply to the Revised Project's construction, which would commence subsequent to the effective date. Residences built to the new 2019 standards will be approximately 7 percent more efficient than those built to the 2016 standards, which were themselves 28 percent more efficient (for electricity) than residences built to the 2013 Title 24 standards. Nonresidential</p>

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		buildings will be approximately 30 percent more energy efficient than those built to the 2016 standards. ^b
<p>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</p> <ul style="list-style-type: none"> • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_x standard. • Last Mile Delivery: New regulation that would result in the use of low NO_x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, 	<p>CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies</p>	<p>Consistent. The CARB approved the Advanced Clean Cars Program in 2012 that establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program likely will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project, depending on the outcome of ongoing negotiations between CARB and EPA regarding federal standards. The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG emissions reductions stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030.</p> <p>CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.^{b,c}</p> <p>GHG emissions generated by Project-related vehicular travel would benefit from this regulation, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions</p>

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>increasing to 10 percent in 2025 and remaining flat through 2030.</p> <ul style="list-style-type: none"> Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.” 		<p>conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also benefit from these measures once adopted.</p> <p>SB 375 requires SCAG to direct the development of the RTP/SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate new residential, commercial and office uses within an HQT. Therefore, the Project would be consistent with SCAG’s 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. Project-related transportation emissions would be reduced by approximately 30 percent (see Appendix B of the Addendum), and therefore, the Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.</p>
<p>Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)</p>	<p>CARB</p>	<p>Consistent Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region. As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years. As part of the 2018 updates, CARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the previous reduction target of 13 percent for 2035. As discussed, the Project</p>

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		would be consistent with the 2016-2040 RTP/SCS and by extension SB 375.
<p>By 2019, adjust performance measures used to select and design transportation facilities.</p> <ul style="list-style-type: none"> Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.). 	<p>CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans</p>	<p>Not Applicable. The Project would not involve construction of transportation facilities. The Project would benefit from this station by encouraging use of mass transit resulting in a reduction of Project-related vehicle trips to and from the Project Site.</p>
<p>By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).</p>	<p>CalSTA, Caltrans, CTC, OPR/SGC, CARB</p>	<p>Consistent. The Project would support this policy since the Applicant would provide electric vehicle charging spaces and electric vehicle supply wiring (EV-ready), consistent with LAMC Section 99.05.106.5.3.</p>
<p>Implement California Sustainable Freight Action Plan:</p> <ul style="list-style-type: none"> Improve freight system efficiency. Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030. 	<p>CARB</p>	<p>Not Applicable. The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.</p>
<p>Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.</p>	<p>CARB</p>	<p>Consistent. This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions were calculated using CalEEMod that includes implementation of the LCFS into</p>

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		<p>mobile source emission factors.</p> <p>The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. The CARB has proposed an amendment to the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. The amendments were released in March 2018 with the public comment period ending in April 2018. The proposed amendments were adopted in September 2018.</p>
<p>Implement the Short-Lived Climate Pollutant Strategy by 2030:</p> <ul style="list-style-type: none"> • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels. 	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p>No Conflict. Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.^e</p> <p>The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.</p>
<p>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</p>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p>Not Applicable. This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. Adoption of the regulations to achieve SB 1383 targets is expected in early 2019.^f</p>
<p>Implement the post-2020 Cap-and-Trade Program with declining annual caps.</p>	<p>CARB</p>	<p>Not Applicable. This applies to State regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted</p>

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
<p>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</p> <ul style="list-style-type: none"> • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan. 	CNRA and departments within, CDFA, CalEPA, CARB	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
<p>Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018</p>	CARB	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
<p>Implement Forest Carbon Plan</p>	CNRA, CAL FIRE, CalEPA and departments within	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not Applicable. This applies to State regulators and is not applicable to a development project. Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.
^a Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547. ^b CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm . ^c CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm . ^d CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm . ^e CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm . ^f CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/ . Source: California Air Resources Board (CARB), California's 2017 Climate Change Scoping Plan, November 2017. Table prepared by DKA Planning, 2020.		

Regional: 2016–2040 RTP/SCS

The 2016–2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.⁶⁷ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.⁶⁸ The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita passenger vehicle GHG emissions by 2020, 18-percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21-percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals.

The Project would result in a VMT reduction of approximately 70 percent as compared to the Project without implementation of VMT reducing measures. This would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. This reduction is attributable to the Project characteristics as being an infill project near transit that supports multi-modal transportation options.

The Project would also be consistent with the following key GHG reduction strategies in SCAG’s 2016–2040 RTP/SCS, which are based on changing the region’s land use and travel patterns:

- Compact growth in areas accessible to transit;
- Jobs closer to transit;
- New job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The Project represents an infill development that would concentrate new residential, office, and commercial uses within an HQTAs, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to Metro bus routes. Employers in the retail and office uses could offer other demand management programs.

⁶⁷ CARB, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.

⁶⁸ SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 153.

In addition, the Project would also provide bicycle storage areas for employees and guests. The Project would also provide employees and guests with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHG emissions. In order to assess the Project's potential to conflict with the 2016–2040 RTP/SCS, this section also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As demonstrated earlier, the Project would be consistent with the 2016–2040 RTP/SCS.

In sum, the Project is the type of land use development that is encouraged by the 2016-2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies.⁶⁹ By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements.

Therefore, as demonstrated in **Table 4.8-3**, the Project would be consistent with the 2016–2040 RTP/SCS and the GHG reduction-related actions and strategies contained therein.

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis^a
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	Consistent. The Project would include residences that would add to the supply and diversity of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities. The Project would be located in an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes.
Plan for growth around livable corridors, including growth on the	SCAG, Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the

⁶⁹ As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis^a
Livable Corridors network.		2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region. The Project would be located in an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	Consistent. The Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips. The Project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas. The Project is a mixed-use housing, office, and retail project.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	Not Applicable. While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG, Local Jurisdictions	Consistent. The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG, County Transportation Commissions, Local Jurisdictions	Not Applicable. While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions, Local Jurisdictions	Consistent. The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG, County Transportation Commissions, Local Jurisdictions	Not Applicable. While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG, County Transportation Commissions, Local Jurisdictions	Not Applicable. This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emission vehicles.	SCAG, Local Jurisdictions	Consistent. While this action/strategy is not necessarily applicable on a project-specific

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis ^a
		basis, the Project would include both electric vehicle charging stations in the parking structure and additional pre-wiring for future potential electric vehicle charging infrastructure, consistent with LAMC Section 99.05.106.5.3.
Promote neighborhood electric vehicles.	SCAG, Local Jurisdictions	Consistent. While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include both electric vehicle charging stations in the parking structure and additional pre-wiring for future potential electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG, Local Jurisdictions	Not Applicable. While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

Local: LA Green Plan/Climate LA Plan

The LA Green Plan outlines the goals and actions the City has established to reduce the generation and emission of GHG emissions from both public and private activities. **Table 4.8-4** evaluates the Project's consistency with applicable GHG-reducing actions from the LA Green Plan. As discussed below, the Project is consistent with the applicable goals and actions of the LA Green Plan. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code. The 2019 Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City Ordinance No. 184,692), incorporated by reference the mandatory requirements of the 2019 California Green Building Standards Code (discussed above under Climate Change Scoping Plan).

The Project would comply with performance-based standards included in the Green Building Code. In order to meet reduction goals in the LA Green Plan, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation through the use of water-conserving fixtures and comprehensive waste management practices, respectively, thereby meeting the goals of the LA Green Plan. In addition, LADWP is required to procure a minimum of 33 percent of its energy portfolio from renewable sources by 2020 and

would continue to implement programs consistent with the LA Green Plan. Therefore, the Project would be consistent with the LA Green Plan.

**Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan**

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City initiated an effort to establish green building requirements, paired with incentives, for medium- to large- private projects. Buildings account for a majority of electricity use. Each building site relates to a wide range of environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	Consistent. While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of the state Green Building Standards Code and the City's Green Building Code.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	<p>The Mayor's Office and LADWP developed the <i>Securing LA's Water Supply</i> plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as:</p> <p>Short-Term Conservation Strategies:</p> <ul style="list-style-type: none"> • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness). • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives, and rebates. • Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). <p>Long-Term Conservation Strategies:</p> <ul style="list-style-type: none"> • Increasing water conservation through reduction of outdoor 	Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features required by Code to reduce indoor water use including Energy Star-certified appliances in residential units and use of ultra low flow toilets and hand wash faucets in public facilities. Further detail is provided in Utilities and Service Systems - Water, of the Addendum.

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
		water use and new technology. <ul style="list-style-type: none"> • Maximizing water recycling. • Enhancing stormwater capture • Accelerating cleanup of the groundwater basin. • Expanding groundwater storage. 	
W2	Reduce per capita water consumption by 20%.	[See W1, above.]	[See W1, above.]
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	Consistent. While the City has implemented this action, the Project would not interfere with the advancement of more signal timing in the City.
T6	Make transit information easily available, understandable, and translated into multiple languages.	A Los Angeles Department of Transportation (LADOT) partnership with the Personnel Department will enable DOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated greenhouse gas emissions.	Consistent. While this action primarily applies to the City, the Project would not impair the ability of the City to make transit information easily available, understandable, and translated into multiple languages.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2 below, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	Consistent. This action primarily applies to the City. Nevertheless, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking, including the installation of bicycle parking spaces in accordance with LAMC requirements.
Focus Area: Land Use			
LU 1	Promote high-density housing close to major transportation arteries.	With 469 square miles, Los Angeles is a vast and sprawling city. Yet many neighborhoods are walkable, with stores and services clustered near dense residential housing. As the city continues to redevelop and	Consistent. The Project represents a mixed-use infill development that would provide residences, office, and retail uses located near regional and local public transit services. The

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
		grow, there is an unprecedented opportunity to rethink the urban environment. Accommodating continued growth requires taking advantage of infill opportunities and increasing density along transit corridors.	Project would provide bicycle storage areas for Project residents, employees, and guests.
LU 2	Promote and implement transit-oriented development (TOD).	Transit Oriented Districts (TODs) represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	Consistent. While this action primarily applies to the City, the proposed Project would concentrate new residential, office, and commercial uses in close proximity to public transit opportunities, including Metro bus routes.
Action		Description	Consistency Analysis
Focus Area: Waste			
Ws T1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	Consistent. While this action primarily applies to the City, the Project would provide adequate storage areas in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or a room of specified size on the Project Site.
Source: DKA Planning, 2020.			

Local: City of Los Angeles Sustainable City pLAn

As discussed above, the 2019 Sustainable City pLAn includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control. Specific targets related to housing and development and mobility and transit include the decrease of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The Project would generally comply with these aspirations as the Project is an infill development consisting of residential and commercial uses on the Project Site, which is located near regional and local transit services.

The Project would be well-served by transit. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage and conserve water, and comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents and guests. Therefore, the Project would be consistent with the Sustainable City pLAn.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the project's incremental contribution of GHG emissions. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant. No mitigation measures are required.

Project GHG Emissions

As described above, compliance with a GHG emissions reduction plan renders a Project less than significant. In support of the consistency analysis which describes the Project's compliance with or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn, quantitative calculations are provided below (**Table 4.8-6**).

The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing buildings parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);

- Mobile source: emissions associated with vehicles accessing the project site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

Project construction is anticipated to be completed in 2024 with occupancy in that same year. A summary of construction details (e.g., schedule, equipment mix, vehicular trips) and CalEEMod modeling output files are provided in **Appendix B** of the Addendum. The GHG emissions associated with construction of the Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in **Table 4.8-5**.

As presented in **Table 4.8-5**, construction of the Project is estimated to generate a total of 2,014 MTCO₂e. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.⁷⁰ This results in annual Project construction emissions of 67 MTCO₂e. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in **Appendix B** of the Addendum.

**Table 4.8-5
Combined Construction-Related Emissions**

Year	MTCO₂e^a
2021	33
2022	960
2023	804
2024	217
Total	2,014
Amortized Over 30 Years	67
In MTCO ₂ e ^a CO ₂ e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix B of the Addendum. Source: DKA Planning, 2020.	

Operation

⁷⁰ SCAQMD Governing Board Agenda Item 31, December 5, 2008.

Area Source Emissions. Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. As shown in **Table 4.8-6**, the Project would result in a total of approximately 5 MTCO₂e per year from area sources.

**Table 4.8-6
Annual GHG Emissions Summary (Buildout)**

Year	MTCO₂^a
Area ^b	5
Energy ^c (electricity and natural gas)	1,438
Mobile	2,729
Solid Waste ^d	66
Water/Wastewater ^e	232
Construction	67
Total Emissions	4,538
In metric tons of carbon dioxide equivalent [MTCO ₂ e]	
^a CO ₂ e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix B of the Addendum.	
^b Area source emissions are from landscape equipment and other operational equipment.	
^c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.	
^d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.	
^e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.	
Source: DKA Planning, 2020.	

Electricity and Natural Gas Generation Emissions. GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO₂ and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity derived from burning fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lbs/MWh) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

This is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.⁷¹ The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool. Since these studies are based on older buildings, adjustments have been made to account for changes to Title 24 building codes but do not reflect 2016 Title 24 standards. For the Project scenario, an adjustment was made to account for the 2016 Title 24 standards. The 2016 Title 24 standards would be applicable to the Project as the Project would be built after January 1, 2017, when the 2016 Title 24 standards went into effect. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than the 2013 Title 24 standards for residential construction and 5 percent more efficient (for electricity) for non-residential construction.⁷²

As shown in **Table 4.8-6**, Project GHG emissions from electricity and natural gas usage would result in a total of 1,438 MTCO₂e per year.

Mobile Source Emissions. Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the number of residential units and amount of building area for the commercial retail and office uses were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 9th Edition*.

The Project represents an infill development within an urbanized area that would concentrate new residential and retail and other uses within an HQTa. The Project Site is located in an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes. The Project would provide bicycle storage areas for Project residents and visitors. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques.⁷³ These techniques would reduce vehicle trips and VMT associated with the Project

⁷¹ CEC, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

⁷² CEC, 2016 Building Energy Efficiency Standards, Frequently Asked Questions.

⁷³ CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.

relative to the standard ITE trip generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the Project Site's density with 281 residences where none currently exist.
- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The Project would introduce new uses on the Project Site, including new residential, office, and retail uses. The Project would co-locate complementary residential and commercial uses in proximity to other off-site residential and commercial uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.
- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The Project would be located near Metro local Bus access service on major arterials serving the vicinity of the Project. The Project would also provide bicycle parking spaces for resident and commercial uses to encourage utilization of alternative modes of transportation.
- **CAPCOA Measure SDT-2 – Traffic Calming Measures:** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Site are equipped with sidewalks, and several of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in **Table 4.8-7**, the Project GHG emissions from mobile sources would result in a total of 2,729 MTCO₂e per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions. Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in **Table 4.8-7**, the Project would result in a total of 66 MTCO₂e per year from solid waste that accounts for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions. GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.⁷⁴ GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG intensity factors for the utility provider. In this case, embodied energy for MWD supplied water and GHG intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2016 California Plumbing Code, 2016 CALGreen, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code, and reflect an approximately 20 percent reduction as compared to the base demand.

As shown in **Table 4.8-7**, Project GHG emissions from water/wastewater usage would result in a total of 232 MTCO₂e per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Combined Construction and Operational Emissions. As shown in **Table 4.8-7**, the GHG emissions for the Project would equal 67 MTCO₂e per year (amortized over 30 years) during construction.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans. One approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a NAT comparison. The analysis in this section includes potential emissions under a NAT scenario and from the Project at build-out based on actions and mandates expected to be in force in 2020.

As shown in **Table 4.8-7**, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 4,548 and 6,738 MTCO₂e per year, respectively, which shows the Project would reduce emissions by 33 percent from CARB's 2020 NAT scenario.

Table 4.8-7
Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	5	5	-	0%

⁷⁴ The intensity factor reflects the average pounds of CO₂e per megawatt generated by a utility company.

Energy Sources	2,480	1,438	-1,042	-42%
Mobile Sources	3,888	2,729	-1,159	-30%
Waste Sources	66	66	-	0%
Water Sources	233	233	-	0%
Construction	67	67	-	0%
Total Emissions	6,738	4,538	-2,200	-33%
<p>Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.</p> <p>* NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).</p> <p>See Appendix B. Source: DKA Planning, 2020.</p>				

The analysis in this report uses the 2017 Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution. The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Project would contribute to statewide GHG reduction goals. Specifically, the Project's mixed-use nature and location in an urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and vehicle miles traveled that no longer are made. Second, it would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

Post-2020 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.⁷⁵ Even though these studies did not provide an exact regulatory and technological

⁷⁵ Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which

roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

The recently adopted SB 100 has since revised the State's renewable resources targets to 44% by 2024, 52% by 2027, 60% by 2030, and 100% by 2045. The Project would use electricity provided by LADWP, which is required to meet the SB 350 and subsequent SB 100 performance standards. LADWP has committed to achieving 50 percent renewables by 2025 and will be required to update its plans to comply with SB 100's 2030 60 percent target. LADWP has also launched the LA100 Study to determine a course for achieving a 100% renewable energy supply.

As discussed above, SCAG's 2016-2040 RTP/SCS and 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2016-2040 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors. Specifically, the 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita GHG emissions by 2020, an 18-percent decrease in per capita GHG emissions by 2035, and a 21-percent decrease in per capita GHG emissions by 2040.

SCAG introduced its proposed 2020-2045 RTP/SCS, titled "Connect SoCal," in 2019, which included virtually the same goals and policies as the 2016-2040 RTP/SCS, and which was formally adopted by SCAG's Regional Council on September 3, 2020. One of the performance results of the 2020-2045 RTP/SCS is to reduce VMT per capita by 5 percent and vehicle hours traveled per capita by 9 percent (for automobiles and light/medium-duty trucks) as a result of regional transit service.⁷⁶

By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS and 2020-2045 RTP/SCS are expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

⁷⁶ SCAG 2020-2045 RTP/SCE, page 12: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plansummary_0.pdf?1606000989

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, as demonstrated above in **Table 4.8-7**, the Project would be consistent with the Actions and Strategies set forth in the 2016–2040 RTP/SCS. Therefore, the Project would be consistent with the 2016–2040 RTP/SCS and the 2020-2045 RTP/SCS.

Conclusion

Thus, given the Project's consistency with state, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to greenhouse gas emissions, the Project would nevertheless implement Mitigation Measure MM4.6-1 from the Certified EIR.

Environmental Standards

The Project would implement Environmental Standard AQ3/GHG1 from the CPIO. Per AQ3/GHG1 C., 5% of total parking stalls shall be Electric Vehicle Supply Equipment (EVSE) capable.

AQ3/GHG1 is the same as MM4.6-1.

4.8.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in any new or increased significant impacts with respect to its impact on climate change, and the Project would not conflict with any applicable plan, policy, or regulation with the goal of reducing GHG emissions. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.8.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

4.8.5 Mitigation Measures Addressing Impacts

The Certified EIR provided Mitigation Measure MM4.6-1 to address impacts with respect to greenhouse gases during the operation of specific projects. While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to greenhouse gas emissions, the Project would nevertheless implement Mitigation Measure MM4.6-1 from the Certified EIR and is shown to comply with regulatory targets as it is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

The Project would also comply with Environmental Standard AQ3/GHG1 from the CPIO.

4.8.6 Conclusion

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR, and no substantial new conditions related to GHG emissions have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.9 Hazards and Hazardous Materials

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No	No	No	No
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant	No	No	No	No
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which is included as **Appendix G** to this Addendum:

G-1 Phase I Environmental Site Assessment, Northgate, February 12, 2020

G-2 Phase II Environmental Site Assessment, Northgate, February 12, 2020

4.9.1 Impact Determination in the Certified EIR

Routine Transport, Use, or Disposal of Hazardous Materials

Should the use and/or storage of hazardous materials at individual development sites rise to a level subject to regulation, those uses would be required to comply with federal and state laws to eliminate or reduce the risk of hazardous materials accidents resulting from routine use, disposal, and storage of hazardous materials during both the construction and operation phases of a project. Therefore, with compliance with applicable regulations this impact is less-than-significant for future uses that could be developed under the proposed plan and implementing ordinances.

Upset or Accident Conditions

During construction of future development projects, hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing toxic substances may be transported to individual sites, and construction waste that possibly contains hazardous materials could be transported off site for purposes of disposal. Appropriate documentation for all hazardous waste that is transported off site in connection with activities at individual sites would be provided as required to ensure compliance with the existing hazardous materials regulations described above. Adherence to these regulations, which requires compliance with all applicable federal and state laws related to the transportation of hazardous materials, would reduce the likelihood and severity of accidents which might occur during transit. As such, impacts associated with the transport of hazardous waste are less than significant.

Federal, state, and local regulations govern the disposal of wastes identified as hazardous which could be produced in the course of demolition and construction. Asbestos, lead, or other hazardous materials encountered during demolition or construction activities would be disposed of in compliance with all applicable regulations for the handling of such waste, reducing the potential impacts of disposal of site-generated hazardous wastes to a level that is less than significant.

Compliance with existing regulations and implementation of standard City mitigation measures would reduce any impact and ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction activities. As such, impacts associated with the exposure of construction workers and the public to hazardous materials during construction activities are less than significant.

Development occurring under the proposed plan would include industrial uses. Additionally, the CPA is also located adjacent to the Port of Los Angeles. Operation of industrial uses and the

Port of Los Angeles could include the use of hazardous materials or generate quantities of hazardous waste that could create an unsafe or hazardous condition for adjacent uses. However, hazardous materials would be used and stored in accordance with applicable regulations and such uses would be required to comply with federal and state laws to eliminate or reduce the consequences of hazardous materials accidents. Therefore, the probability of a hazardous materials incident would be remote, and the impact is less than significant.

Compliance with LAMC Chapter IX, Article 1, Division 71 would ensure that any impacts associated with methane gas by ensuring compliance with Methane Mitigation Standards, as required by the City of Los Angeles. As such, the potential impacts associated with methane gas are less than significant.

Hazardous Materials Near a School

The routine use, transport, and disposal of hazardous materials in the CPA would be subject to a wide range of laws and regulations intended to minimize potential health risks associated with their use or the accidental release of such substances. Compliance with existing regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials. Therefore, future development under the proposed plan would result in a less-than-significant impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Hazardous Materials Site

If contamination at any specific site were to exceed regulatory action levels, the individual project Applicant would be required to undertake remediation procedures prior to grading and development under the supervision of appropriate regulatory oversight agencies (e.g., LAFD, Los Angeles County Environmental Health Division, DTSC or RWQCB), depending on the nature of any identified contamination. Consequently, if future development under the proposed plan is located on a site that is included on a list of hazardous materials sites, remediation would ensure that this impact would be less than significant.

Emergency Response Plan

Construction and operation activities within the CPA with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which coordinates with the Police and Fire Departments to ensure that emergency access is maintained at all times. Furthermore, the potential for any increased delays along evacuation routes from the incremental increase in new workers and patrons resulting from implementation of the proposed plan would be considered less than significant. Construction and operation associated with related projects and other future development in the City and surrounding area would not interfere with adopted emergency response or evacuation plans. The existing Safety Element of the City of Los Angeles General Plan identifies goals (1, 2, and 3), objectives (1.1, 2.1, and 3.1), and policies (1.1.4, 2.1.2, 2.1.5, 3.1.1, 3.1.2, 3.1.4, and 3.1.5), and the proposed plan includes

Policy CF2.3, that help reduce impacts to adopted emergency response plan or emergency evacuation plan to less than significant.

Wildland Fires

New construction in the Very High Fire Hazard Severity Zone must comply with a variety of strict requirements including provisions for emergency vehicle access, use of approved building materials and design, brush clearance and so forth. Susceptible areas have land development that is governed by special state and local codes, and property owners are required to follow maintenance guidelines aimed at reducing the amount and continuity of the fuel (vegetation) surrounding structures. State, county, and City fire safety building code requirements would be incorporated into new development, as appropriate. With implementation of the hazard reduction standards, the impact resulting in the risk of loss, injury, or death involving wildland fires is less than significant.

Mitigation Measures

No impacts related to hazards and hazardous materials were determined for the Community Plan, and no mitigation measures were required.

4.9.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Routine Transport, Use, or Disposal of Hazardous Materials

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, impacts would be less than significant.

Upset or Accident Conditions

The Site is listed on the UST database and the historic automobile service station list. The UST database listing appears to be related to the presence of former gasoline and waste oil USTs that were operated by the gasoline service station in the southwestern portion of the Site from the 1920s through the early 1970s. Based on available records, the USTs appear to have been abandoned in place in the early 1970s and subsequently excavated, removed, and the cavity backfilled during redevelopment in 1977. No additional information is available regarding the operations at the gasoline service station or related to the former USTs.

There are no Recognized Environmental Conditions (RECs) in connection with the property.

The Phase I identified the following potential business environmental risks:

- Historic Site occupants variously identified between about 1921 and 1977 have included a gasoline service station that operated two 1,000-gallon gasoline USTs and one 550-gallon waste oil UST, a greasing operation, and rubber vulcanization area. No closure documents were available indicating no further action related to the historic USTs at the Site. Although no documented hazardous materials release has been identified at any of these operational areas, these historic land uses are reasonably associated with the use, storage, and potential release of petroleum products, solvents, and/or other hazardous materials. Limited soil, groundwater, and soil vapor sampling were conducted in these areas in the past, which indicated that no significant environmental impacts were encountered as a result of these historic Site operations. In addition, in 2020, Northgate conducted a more comprehensive investigation to evaluate the potential presence of impacted soil, soil vapor, and groundwater associated with the above described features and impacts and also found no significant impacts associated with these historic Site operations.
- Fill materials have been documented to have been imported to the Site to backfill the excavation area of a UST removal and to redevelop the Site into its current configuration. However, soil sampling of the fill material indicated that all soil sample results were below screening levels with the exception of one soil sample (collected at 1 foot bgs) where TPH just exceeded screening levels. Northgate understands that this soil will be excavated during development of the Site.

Northgate concurrently conducted a Phase II ESA to evaluate the potential presence of impacted soil from historical Site operations discussed above and/or undocumented fill present at the Site. The Phase II ESA included the analysis of 54 soil samples, 2 groundwater samples, and 10 soil vapor samples, collected from 10 borings.

- None of the soil samples exceeded state or federal hazardous waste thresholds.
- The metals concentrations in groundwater do not appear to be associated with former Site operations and may be naturally occurring.
- Soil vapor concentrations were quite low, and therefore, were not indicative of material VOC soil contamination as it relates to any historic operations.

The soils would be exported as part of the Project.

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.⁷⁷

The Project Site is not within a Methane Buffer Zone.⁷⁸

⁷⁷ California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed March 24, 2020.

⁷⁸ ZIMAS search: <http://zimas.lacity.org/>.

The Project shall be maintained in a neat, attractive, and safe condition at all times. On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times. Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers shall be emptied a minimum of once per week. Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris. Operational impacts would be less than significant.

Compliance with existing applicable laws would ensure that impacts during construction and operation would be less than significant.

Hazardous Materials Near a School

The Port of Los Angeles High School (250 5th Street) is located 615 feet northwest of the Site. Compliance with existing applicable laws would ensure that impacts during construction and operation would be less than significant.

Hazardous Materials List

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.⁷⁹

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites, waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.⁸⁰

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.⁸¹

There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.⁸²

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.⁸³

⁷⁹ CA Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, March 24, 2020.

⁸⁰ CA State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, March 24, 2020.

⁸¹ CA Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed March 24, 2020.

⁸² CA Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselst/>, accessed March 24, 2020.

The Project Site is not a City-designated Hazardous Waste / Border Zone Property.⁸⁴

The Los Angeles City Fire Department (LAFD) maintains a database online with property addresses identified as active or inactive facilities for USTs, aboveground petroleum storage tanks (ASTs), and hazardous materials. The Site was listed in hazardous materials list and the historical UST list, both times at the address of 636 South Palos Verdes. The LAFD had a record of abandonment of two 1,000-gallon USTs and one 550-gallon UST in 1972. The 1,000-gallon tank contents are listed as unknown but presumably contained gasoline for the documented refueling operations. The 550-gallon UST was listed to have contained waste oil. The LAFD also had permits and notifications of abandonment for the USTs dated June 1972.

The Project Site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment. Therefore, a less than significant impact would occur.

Airport Land Use Plan

There are no nearby private airstrips. The Goodyear Blimp Airbase in Carson is located approximately 6 miles to the south. Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore no impact would occur.

Emergency Response Plan

The bulk of the work will be conducted on site. However, if temporary lane closures are needed, it would require Street Services approval. In addition, there are no emergency services located within the immediate vicinity of the affected streets during construction (i.e. the streets surrounding the Site). Since the closures during construction would be for the parking lane, the temporary construction impacts on the roadway network would be considered less than significant.

Major roadways throughout the City, such as Harbor Boulevard, are selected disaster routes.⁸⁵ Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the disaster route and emergency access would be maintained at all times.

⁸³ CA Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, accessed March 24, 2020.

⁸⁴ ZIMAS search: <http://zimas.lacity.org/>.

⁸⁵ Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 24, 2020.

The Project Site is not within a Hillside Area.⁸⁶ The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

Wildland Fires

The Project Site is not located in a Very High Fire Hazard Severity Zone⁸⁷ or in the wildlands fire hazard Mountain Fire District.⁸⁸ The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.9.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to hazards or hazardous materials. No substantial changes to hazards and hazardous materials have occurred since certification of the EIR, and no substantial new hazards and hazardous materials have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.9.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to hazards or hazardous materials not discussed in the Certified EIR, significant effects related to hazards or hazardous materials previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.9.5 Mitigation Measures Addressing Impacts

⁸⁶ ZIMAS search: <http://zimas.lacity.org/>.

⁸⁷ ZIMAS search: <http://zimas.lacity.org/>.

⁸⁸ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 24, 2020.

Because the Certified EIR determined the Approved Project would have less than significant impacts on hazards and hazardous materials resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.9.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to hazards and hazardous materials would occur as a result of the Project. Therefore, the impacts to hazards and hazardous materials as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.10 Hydrology and Water Quality

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant	No	No	No	No
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant	No	No	No	No
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) Result in substantial erosion or siltation on- or off-site?	Less Than Significant	No	No	No	No
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	No	No	No	No
(iv) Impede or redirect flood flows?	Significant and Unavoidable	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

4.10.1 Impact Determination in the Certified EIR

The City of Los Angeles requires that all storm drainage improvements in new hillside developments be designed to accommodate a 50-year storm event. In addition, the proposed

plan includes Policies CF11.1, CF11.2, and CF11.3 that encourage the use of infiltration system technology, bioretention, and stormwater capture, while discouraging projects that would alter drainage patterns (Policy CF6.4 and Policy LU1.4). With implementation of the existing City of Los Angeles standards, the proposed plan and implementing ordinances would not lead to increased flooding by altering existing drainage patterns or cause flooding during a projected 50-year storm event that would have the potential to harm people or damage property or sensitive biological resources. Therefore, impacts related to flooding and water flow are less than significant, and no mitigation measures are required.

There are FEMA-designated 100-year flood hazards zones along the coastal cliffs in the southern portion of the CPA, including Point Fermin Park near the Los Angeles Harbor breakwater, and two small areas in the CPA (one between Pacific Avenue and Gaffey Street south of 3rd Street, and the other east of Walker Avenue and north of 13th Street). There is one FEMA-designated 500-year flood hazard zone within the CPA at Point Fermin Park near the Los Angeles Harbor breakwater. These flood hazard areas have been mapped by FEMA and development within these flood hazard areas is restricted. None of the proposed plan changes would permit new development within these flood zones. Implementation of the existing City of Los Angeles policies and regulatory requirements would ensure the adoption and implementation of the proposed plan would not place housing or structures within a flood hazard zone or in an area that would impede or redirect flood flows. Therefore, these impacts are less than significant, and no mitigation measures are required.

The adoption and implementation of the proposed plan, in combination with the City's standard grading and building permit requirements, would not expose people or structures to potential substantial risk due to seiche, tsunami, or mudflow. Therefore, these impacts are less than significant, and no mitigation measures are required.

Requirements of the SUSMP are enforced through the City's plan approval and permit process and all new development projects are subject to City inspection. Furthermore, all applicable projects must comply with Article 4.4 of LAMC, Section 64.72, which governs pollutant control requirements and construction activity requirements. Compliance with the LAMC would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. In addition, implementation of proposed plan Policies CF 11.1, CF 11.2, and CF 11.3 that encourage the use of infiltration system technology, bio-retention, and stormwater capture, which would be reviewed during project design, would comprise effective stormwater quality BMPs. Impacts are less than significant, and no mitigation is required.

Implementation of the proposed plan would not involve direct groundwater withdrawal or injection. Existing seawater intrusion features would not be affected, nor would any known contaminant plumes. Recharge potential is negligible. The stormwater quality BMPs would effectively manage surface water quality so that stormwater infiltration, if any, would not represent a substantial risk to groundwater quality degradation. Therefore, impacts with respect to violations of water quality standards, discharge, and rate or movement of existing

contaminants are less than significant, and no mitigation is required.

With implementation of the SUSMP, LAMC, and proposed plan policies, the adoption and implementation of the proposed plan and implementing ordinances would not substantially alter the existing drainage pattern of the site or area resulting in erosion/siltation or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Therefore, impacts related to erosion/siltation are less than significant, and no mitigation is required.

A small shoreline segment of the CPA, east of Pacific Avenue and extending south to Point Fermin, could be exposed to flooding from future sea level rise, partially from incremental effects from the growth anticipated by the CPA. Therefore, this impact is significant and unavoidable.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

No feasible mitigation measures. (See also *CBIA v. BAAQMD*, (2015) 62 Cal.4th 369)

4.10.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The Project does not involve the introduction of new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the Project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing condition of the Project Site and its surroundings. Therefore, impacts would be less than significant.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, no impact would occur.

The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the Project will not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, no impact would occur.

The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, no impact would occur.

Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure operational water quality impacts are less than significant.

According to FEMA the Flood Insurance Rate Map, the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.⁸⁹ Additionally, the Project Site is not located within a City-designated 100-year floodplain.⁹⁰ The Site is not within a Flood Zone.⁹¹ Therefore, no impact would occur.

The Project is located approximately 600 feet from the San Pedro Main Channel (to the LA Harbor). However the Project is not located within an area potentially impacted by a tsunami.⁹²

There are no major water-retaining structures located immediately upgradient from the Project Site. Therefore, flooding from a seismically-induced seiche is considered unlikely.

The Project Site is not located within an area designated as a 100-year flood hazard area.⁹³ In addition to the low risk of flooding, the Project includes LID requirements for capture and use and/or biofiltration system and a stormwater conveyance system, which would be improve upon the existing site, which is devoid of treatment and on-site detention. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Therefore, no tsunami or seiches would be expected to impact the Project Site that would risk release of pollutants due to Project inundation. No impact would occur.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Therefore, no impact would occur.

⁸⁹ FEMA, Flood Map Service Center: <https://msc.fema.gov/portal>, March 24, 2020.

⁹⁰ Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 24, 2020.

⁹¹ ZIMAS search: <http://zimas.lacity.org/>.

⁹² ZIMAS search: <http://zimas.lacity.org/>.

⁹³ NavigateLA, FEMA Flood Hazard layer: <http://navigatea.lacity.org/navigatea/>, March 24, 2020.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.10.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to hydrology and water quality. No substantial changes related to hydrology and water quality have occurred since certification of the EIR, and no substantial changes have occurred in the physical environment that would result in new or more severe significant environmental impacts.

4.10.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified related to one or more significant effects related to hydrology and water quality not discussed in the Certified EIR, significant effects related to hydrology and water quality previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.10.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on hydrology and water quality, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.10.6 Conclusion

Based on the above, no new significant hydrologic/water quality impacts or a substantial increase in previously identified hydrologic/water quality impacts would occur as a result of the Project. Therefore, the impacts to hydrology and water quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162.

4.11 Land Use and Planning

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

4.11.1 Impact Determination in the Certified EIR

The Certified EIR stated that implementation of the Community Plan would introduce ordinances that include standards and guidelines for projects within the San Pedro CPA, including a Community Plan Implementation Overlay District (CPIO) containing several subareas throughout the CPA.

The plan and implementing ordinances do not include any extensions of roadways or other development features through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. The majority of the land use changes proposed by the plan and implementing ordinances consist of General Plan Amendments to create consistency with GPF Land Use designations and/or changes to create consistency between the Community Plan Land Use Map and the actual built land uses on parcels. The CPA is a developed area and the plan and implementing ordinances do not propose any land use changes that would substantially change land use patterns in the CPA. Development under the plan and implementing ordinances would occur on discrete or undeveloped parcels that are scattered throughout the CPA. Therefore, the plan and implementing ordinances would not result in the disruption, division, or isolation of an established community. There is no impact.

The proposed plan would implement the goals, policies, and objectives within the Los Angeles General Plan Framework (GPF) and would be consistent with other Elements of the General Plan. The majority of the land use changes proposed by the plan and implementing ordinances consist of General Plan Amendments to create consistency with GPF land use designations. As such, the proposed plan would apply updated GPF Land Use categories, and correct minor errors. In fact, fewer nonconforming uses would exist on implementation of the proposed plan. Existing residential neighborhoods would be protected and would not be converted to

nonresidential use. The proposed plan, in addition to providing consistency with the GPF, would focus on intensification of development along existing industrial and commercial corridors and in the Downtown. The policies of the proposed plan support the primary objectives and policies of the GPF Element's Land Use chapter to support the viability of the City's residential neighborhoods and commercial districts, and, when growth occurs, to encourage sustainable growth in a number of higher-intensity commercial and mixed-use districts, and industrial districts, particularly in proximity to transportation corridors and transit stations. Therefore, there is no impact.

The proposed plan would strengthen commercial and recreational opportunities by facilitating improvements in Downtown San Pedro and encouraging improvements to the waterfront promenade and Port waterfront for a desirable center of commerce, recreation, and tourism. Implementation of the proposed plan would not 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. This impact is less than significant.

As the proposed plan would not intensify development in residential areas, instead focusing intensification in the Downtown and along established commercial and industrial corridors, impacts to existing land uses would be minimal and the proposed plan would not result in a substantial increased potential for land use conflicts and nuisance relationships between existing and future land uses. Implementation of mitigation measures would ensure this impact remains less than significant.

Mitigation Measures

Impacts related to land use and planning were determined to be less than significant. Therefore, no mitigation measures were required.

4.11.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The Project is consistent with the permitted density, floor area, FAR, and height for the Project Site. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to land use and planning were accounted for within the analysis contained in the Certified EIR.

Physically Divide an Established Community

The Certified EIR determined that implementation of the Community Plan would not include any extensions of roadways or other development features through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Instead, the Certified EIR determined that the land use changes in the Community Plan would create consistency between the Community Plan land use map and the actual built land uses on parcels.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site and is contiguous and bounded by streets. In addition, the Site is not large enough to encompass an established community. The Project's uses are compatible with the residential and commercial uses in the area. Throughout the City and near the Project Site, there are similar uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. Therefore, no impact would occur.

Consistency Analysis

The Project would be substantially consistent with all of the applicable plans, policies, and regulations contained in regional and local plans. While the policies described below were generally not adopted for the purpose of avoiding or mitigating an environmental effect, an analysis of the Project's consistency with these policies has nevertheless been provided below, for informational purposes. Finally, as discussed throughout this Addendum, implementation of the Project would not result in any significant impacts, nor would the Project result in increased impacts beyond those identified in the Certified EIR. As such, the Project's impacts with respect to land use and planning would be less than significant.

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

As discussed on **Table 4.11-1**, the Project would be substantially consistent with the Framework Element.

**Table 4.11-1
Framework Element**

Goal, Objectives, Policies	Discussion
Land Use Chapter	
Section 2: Issue One: Distribution of Land Use	
<p>Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable [sic] city.</p>	<p>No Conflict. While this is a citywide goal, the Project would revitalize an existing under-utilized site by providing a new mixed-use building with residential and retail uses. The Project would be developed with sustainability features and landscaped open space and recreational areas for both the public and Project residents. The Project would be well-served by public transit. The Project would create a new development that would contribute to a transit-oriented mixed-use neighborhood of the City.</p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>Consistent. While this policy refers to the citywide provision of public infrastructure, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.</p>	<p>No Conflict. While this policy relates to citywide provision of open space, the Project would provide a variety of open space areas within the Project Site, including recreational amenities for residents. The Project would provide open space required by LAMC Section 12.21-G.</p>
<p>Policy 3.1.9: Assure that fair treatment of people of all races, cultures, incomes, and education levels with respect to the development, implementation and enforcement of environmental laws, regulations, and policies, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in early planning stages through notification and two-way communication.</p>	<p>No Conflict. Pursuant to CEQA, the City of Los Angeles and the Project Applicant have engaged with the community throughout the planning and environmental review process.</p>
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access</p>	<p>No Conflict. While this is a citywide objective, the Project supports this vision of development. The Project would be well-served by public transit. Furthermore, the Project would provide bicycle parking</p>

and use in appropriate locations	spaces for residents and visitors. In addition, the ground floor retail uses and streetscape improvements proposed by the Project would promote walkability in the vicinity of the Project Site. Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled (VMT), and air pollution.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	No Conflict. The Project's population and employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the Framework Element's demographics projections and planned provisions of transportation and utility infrastructure and public services. Therefore, the Project would not require the construction of utilities or transportation infrastructure and the Project would not conflict with this objective.
Section 3. Issue 2: Uses, Density, and Character	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	Consistent. The Project would include mixed-use development that provides jobs and serves the region. The Project Site is currently developed with under-utilized commercial buildings. By enabling the construction of a high-density housing project in close proximity to employment centers, neighborhood services and transit, including various bus lines, the development is consistent with the outlined goals and policies of the Framework Element.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	Consistent. The Project would include commercial uses of similar scale to those found along 6th Street, including the under construction development north of the Site.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any	Consistent. The Project Site is zoned C2, which allows residential and commercial uses. The Project would be a mixed-use structures integrating housing with commercial uses.

area shall be identified in the community plans.

Table 3-1

Category	Typical Characteristics/Uses	Discouraged Uses
Region	<ul style="list-style-type: none"> Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and similar uses. Mixed-use structures integrating housing with commercial uses Multi-family housing (independent of commercial) Major transit hub Inclusion of small parks and other community-oriented activity facilities A focal point of regional commerce, identity and activity, Regional Centers generally will fall within the range of floor area ratios from 1.5:1 to 6.0:1, characterized by six- to 20-stories (or higher) buildings. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Gasoline/automotive services which may also provide accessory uses 	General (highway-oriented) commercial; e.g., nurseries, and similar uses

such as retail, food stores, restaurants and/or take-out.	
Table 3-6 Land Use Designation Corresponding Zones Regional Center CR, C1.5, C4, [Q]C2	
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	Not Applicable. This is directed to the public agencies, which has the ability to create transportation centers.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers.	Consistent. The Project will improve the area around the Site by activating the sidewalk with ground floor commercial uses.
Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.	Consistent. The Project will improve the area around the Site by activating the sidewalk with ground floor commercial uses.
Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	Consistent. The Project would provide 5,000 square feet of community open space on the northeast corner of the building (6th and Beacon) per CPIO Chapter II.E.
Policy 3.10.6. Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	Consistent. The Project will provide safety and security lighting as appropriate.
Housing Chapter	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	No Conflict. While this is a citywide objective, the Project would support its implementation. In addition, the ground floor retail use and streetscape improvements proposed by the Project would promote walkability in the vicinity of the Project Site. While the Project Site is not immediately adjacent to high-density residential neighborhoods, the Project would be designed to be similar and compatible in density and scale of the surrounding areas. See Policy 3.2.4 for a discussion of the Project's location within an area occupied by buildings of the similar scale and character as those proposed by the Project.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other	No Conflict. While this is a citywide/regional goal, the Project would contribute to the public and private open

land uses.	space system by designating publicly-accessible landscaped open space on the ground floor and recreational amenities and open space areas for Project residents. Furthermore, the Project would not conflict with the public and private open space system because it would not encroach upon existing open space.
Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.	No Conflict. While this is a citywide policy, the Project would support its implementation by providing open space as set forth by the LAMC.
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	No Conflict. Refer to Policy 6.4.7 above.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	No Conflict. The Project would support this objective by providing retail uses to complement the employment base of the Community Plan area, help meet needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	No Conflict. The Project would be well-served by public transit.
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	Consistent. As discussed in Objective 7.2 and Policy 7.2.3 above, the Project would include retail uses that would serve Project residents, employees, visitors, and the local neighborhood, which would reduce VMT.

<p>Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.</p> <p>Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.</p>	<p>No Conflict. The Project would be well-served by public transit. Accordingly, the Project would concentrate future residential development along a mixed-use/transit corridor to optimize the impact of City capital expenditures on infrastructure improvements.</p>
<p>Infrastructure and Public Services</p>	
<p>Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.</p>	<p>No Conflict. The Project would implement a SWPPP as required under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). The Project would implement best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the Standard Urban Stormwater Mitigation Plan (SUSMP). The Project does not include uses that handle or generate hazardous substances.</p>
<p>Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.</p> <p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>No Conflict. Refer to Policy 9.3.1 above.</p>
<p>Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.</p>	<p>No Conflict. Based on LADWP's demand projections provided in its 2015 UWMP, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project</p>

	Site. Therefore, the Project would not conflict with this objective and no new water supply, storage, and delivery systems are required to support the development.
http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm	

Housing Element

The City's Housing Element (adopted by the City Council on December 14, 2013) states that that the population of Los Angeles will grow by over 140,000 persons from 2013 to 2021 (City of Los Angeles Housing Element Chapter 1, Pg. 4). The amount of housing needed to accommodate citywide growth for the current Regional Housing Needs Assessment (RHNA) cycle of 2014-2021 was determined to be 412,721 dwelling units (City of Los Angeles Housing Element Chapter 1, Pg. 78). The City is launching the 2021-2029 Update to the Housing Element, a state-mandated Element of the General Plan. It is expected to be adopted by the end of 2020.

The Project would provide current and future downtown San Pedro employees with housing at a infill location. The Project would add up to 281 dwelling units to the City's downtown adjacent housing stock. The Project would be part of an emerging pedestrian-oriented district encouraging the use of mass transit.

Mobility Plan 2035

The Mobility Element includes Policy 3.3, "Land Use Access and Mix", which aims to "Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services (Mobility Element 2035, Pg. 85). By providing high density residential and commercial space within the Downtown San Pedro Neighborhood, the Project has been designed with this policy in mind.

The Project would be desirable to the public convenience and welfare, proper in relation to adjacent uses of the development in the community and not detrimental to the character of development in the immediate neighborhood and is in harmony with the various elements and objectives of the General Plan, including the Mobility Element 2035.

San Pedro Community Plan

The Project Site is located within the San Pedro Community Plan (Community Plan), which was adopted in October 2017.⁹⁴ **Table 4.11-2**, Community Plan, sets forth the Community Plan's goals and policies for commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals and policies

⁹⁴ San Pedro Community Plan: https://planning.lacity.org/odocument/ee5aacbb-fce7-4dc2-9f91-2df177a48417/San_Pedro_Community_Plan.pdf

of the Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

The Project would also implement and be consistent with the applicable goals and policies of the General Plan and the General Plan Framework. The Project includes a mix of urban infill uses (residential, commercial) with bicycle parking and is located near public transit. Additionally, the Project would promote economic development by providing a number of construction and permanent jobs. The Project supports and promotes a pedestrian oriented streetscape around the Site.

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Standards Code (CalGreen).

**Table 4.11-2
Community Plan**

Goals, Policies	Discussion
Regional Commercial	
Goal LU11: A distinct, mixed-use, transit and pedestrian-oriented Regional Center that serves as a civic, cultural and entertainment destination for the City, and provides a vibrant mix of retail, employment, entertainment, and residential uses that are a complement to, and extension of waterfront attractions.	Consistent. The Project provides a mix of residential and retail uses that would strengthen viable commercial development and provide new services within existing commercial areas.
LU11.1 Commerce and jobs. Develop regional shopping and office projects in the Regional and Community Centers that provide shopping and jobs for both San Pedro residents and those of nearby communities.	Consistent. The Project would provide shopping and jobs for residents. The Project would increase the housing supply to serve the needs of existing and future residents and would concentrate development in an area well-served by transit.
LU11.2 Urban vitality. Promote housing and employment uses in San Pedro's existing Regional Center as a means of enhancing retail viability, establishing pedestrian-oriented shopping districts, creating more attractive buildings and public spaces, supporting transit viability, and reducing vehicle trips.	Consistent. The Project would provide housing and employment uses.
LU11.3 Urban core. Foster development of the Regional Center into a compact high intensity office and employment hub of Downtown, with a strong government, financial, commercial, and visitor-serving orientation, while permitting residential development to provide vitality during non-work hours.	Consistent. The Project would provide housing and employment uses.
LU11.4 Expand visitor-serving opportunities. Encourage a variety of shopping, dining, entertainment, lodging and visitor-oriented activities to increase tourism and enhance economic activity in San Pedro.	Consistent. The Project includes retail uses and would activate the area throughout the day and night with residential uses.
LU11.5 Regional Center emphasis. Generally direct higher-intensity land uses and taller buildings to major intersections along arterial roads to facilitate access, enhance transit service, and promote physical differentiation between the Downtown Regional Center and adjacent Community Commercial Center along Pacific Avenue and Gaffey Street.	Consistent. The Project's massing and height would be similar to surrounding buildings.

LU11.6 Downtown revitalization. Revitalize and strengthen Downtown San Pedro as the historic commercial center of the community, to provide shopping, civic, social, and recreational activities.	Consistent. The Project would provide housing and employment uses.
LU11.7 Develop a multi-modal center. Develop a multi-modal transportation center (Multi-modal transportation considers various modes such as walking, cycling, automobile, public transit, etc.) in or near Downtown San Pedro.	Not Applicable. This is directed to the public agencies, which has the ability to create transportation centers.
LU11.8 Large-scale development. Major new developments should be designed to integrate pedestrian-oriented features and connections, abundant landscaping, paseos and alleys; and to retain public views to the waterfront per the San Pedro CPIO. "Superblocks" should be discouraged. Where development fronts on multiple streets, its design should include architectural features on all street frontages.	Consistent. The Project would provide 5,000 square feet of community open space on the northeast corner of the building (6th and Beacon) per CPIO Chapter II.E.
LU11.9 Discourage AGFs. Above ground facilities (AGF) should not be located on scenic highways. AGFs should be located below grade or out of public view when sited along scenic highways or in proximity to view corridors, vista points, community design overlays or other public scenic access points.	Not Applicable. The Project is not on a scenic highway.
Source: San Pedro Community Plan, https://planning.lacity.org/odocument/ee5aacb-fce7-4dc2-9f91-2df177a48417/San_Pedro_Community_Plan.pdf	

ZI-2478 San Pedro Community Plan Implementation Overlay (CPIO)

The San Pedro CPIO District is the implementing ordinance of the San Pedro Community Plan. The intent of the San Pedro CPIO District is to preserve and strengthen the appearance, vitality, and compatibility of San Pedro's commercial, industrial, and multi-family residential areas. It provides use and design standards to shape new development and improvements to existing properties. The San Pedro CPIO District incorporates the Downtown San Pedro Community Design Overlay guidelines to further shape future development.

The Regional Commercial Subarea provides use limitations and development standards for new development in the Regional Center (as set forth on the Long Range Land Use Diagram of the City of Los Angeles General Plan Framework Element) that support a compact center of employment, entertainment, civic and cultural activities, and waterfront tourism. This Subarea seeks an airy aesthetic through well-designed, medium to high-rise buildings that preserve upland views, and maximize public spaces and connections to the waterfront. This Subarea promotes the establishment of regional uses, including major entertainment and cultural facilities, hotel and restaurant uses, corporate or professional offices, and government buildings, as well as residential uses that provide vitality and improve transit viability. This Subarea creates an active, pedestrian-oriented district through building orientation, façade, articulation, and ground floor transparency to commercial and community uses.

Table 4.11-3 provides the CPIO development standards for Reginal Commercial and the Project's consistency with each item.

**Table 4.11-3
CPIO**

Development Standards	Discussion
Regional Commercial	
<p>A. Building Height. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following building height regulations:</p> <ol style="list-style-type: none"> 1. Overall Height. <ol style="list-style-type: none"> (a) The Ground Floor shall have a minimum height of 14 feet, measured from the finished floor to the underside of the structural floor or roof above. (b) The maximum building height is 250 feet. (c) Other than with a CPIO Adjustment or a CPIO Exception, a Project may only exceed 250 feet in height if approved pursuant to LAMC Section 12.24.V, except that the initial decision-maker shall be the City Planning Commission. (d) A minimum five-foot setback shall occur at a minimum height of 35 feet. 	<p>Consistent. The Project maintains compliance with 8-stories and a maximum height of 85 feet. The minimum height of the ground floor will be at least 14 feet and incorporates a 5-foot setback at a minimum height of 35 feet as a larger pedestrian scaled massing gesture and further meets the requirements found within this subarea.</p>
<p>B. Building Density & Intensity. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following building density and intensity regulations:</p> <ol style="list-style-type: none"> 1. For a Project zoned C2-2D, the maximum FAR shall be 6:1. 2. For a Project zoned R4-2D, the maximum FAR shall be 4:1. 	<p>Consistent. The C2-2D-CPIO Zone allows for a maximum FAR of 6:1, which is consistent with the proposed 338,046 square feet of floor area. The total proposed floor area is 338,046 square feet (6:1 FAR), made up of 335,730 square feet of residential and 2,316 square feet of commercial.</p>
<p>C. Building Design. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following building design regulations:</p> <ol style="list-style-type: none"> 1. For new construction, the exterior wall of any building or parking structure shall be located not more than five feet from the Primary Lot Line, except that the exterior wall may be more than five feet from the Primary Lot Line when the setback area is used for open space consistent with Subsection E. 2. For new construction, at least 60 percent of the Primary Frontage at the Ground Floor shall consist of doors and windows. Windows and doors shall allow views into building interiors or to merchandise displays. At minimum, 70 percent of window bases shall be set at a maximum of three feet as measured from finished grade. 3. Glass as part of the external facade of buildings shall be no more reflective than necessary to comply with Green Code or other state or local UV requirements. 4. The exterior facade of buildings five stories or less shall incorporate no more than three complementary building materials, including but not limited to glass, tile, masonry, smooth stucco, or stone. 5. Heavily textured stucco is prohibited. 	<p>Consistent. The Project is designed with approximately 60 percent of the ground floor's primary frontage with doors and windows to allow views into the building interior. Additionally, a minimum of 70% of the window bases will be set a maximum of 3-feet from finished grade, consistent with the Regional Commercial subarea.</p> <p>The glass and windows used for the exterior façade of the building would be no more reflective than necessary to comply with the California Green Building Code and other state and local UV requirements.</p> <p>Further, the building façade does not contain a heavy emphasis on textured stucco as prohibited within the CPIO.</p>

<p>D. Building Disposition. In addition to any regulations set forth by the underlying zone and the LAMC, Projects involving new construction shall comply with the following building disposition regulations:</p> <ol style="list-style-type: none"> 1. Buildings and parking structures shall occupy 100 percent of the length of the Primary Lot Line, except to provide required driveways or open space consistent with Subsection E. 2. Commercial Uses located on the Ground Floor shall have an entrance directly accessible from an Arcade, a street, or open space consistent with Subsection E, without the need to cross a parking lot or driveway. 3. Each residential unit at the Ground Floor shall be directly accessible from the street, without the need to cross a parking lot or driveway. 4. Individual entrances to each unit shall be set back a minimum of three feet from the sidewalk. 5. Individual entrances to each unit shall be a maximum of three feet above or below sidewalk grade. 	<p>Consistent. The Project would provide commercial uses on the ground floor and would contain direct entrances accessible from 6th Street, without the need to cross any parking lots or driveways. Additionally, each residential unit on the ground floor is accessed directly from the street, without the need to cross a parking lot or driveway, all while maintaining a minimum setback of 3-feet from the sidewalk. The orientation of the proposed structure is designed to be consistent with the building disposition as prescribed within the Regional Commercial subarea.</p>
<p>E. Publicly Accessible Open Space. In addition to any regulations set forth by the underlying zone and the LAMC, Projects involving new construction shall comply with the following publicly accessible open space regulations:</p> <ol style="list-style-type: none"> 1. Projects on properties that front 200 feet or more of a single street shall include open space that is all of the following: <ol style="list-style-type: none"> (a) A minimum of 5,000 square feet; (b) Located on the ground level with direct pedestrian connection to the adjacent street; (c) Unenclosed by any wall, fence, gate, or other obstruction; (d) Lined with Ground Floor tenant spaces usable for retail uses, including one or more restaurants, along at least 20 percent of the building frontage that abuts the open space; (e) At least 40 percent landscaped with usable lawn or similar usable groundcover or artificial grass, or with plant materials that are low maintenance, and native or drought tolerant; and (f) Improved with Pedestrian Amenities. 2. Projects on properties that front less than 200 feet of a single street shall provide open space at a rate of one square foot per 100 square feet of nonresidential floor area up to 5,000 square feet. The open space shall be visible and accessible from the sidewalk and include Pedestrian Amenities and/or landscaped areas. 3. Projects with frontage on Harbor Boulevard shall locate the required open space adjacent to Harbor Boulevard. 4. Projects required to provide open space under LAMC Section 12.21.G may reduce the required open space by up to 50 percent if the Project includes open space that meets at least five requirements listed in Subparagraph E.1. 5. Any open space required or regulated pursuant to this Subsection E shall be accessible to the public during business 	<p>Consistent. Per Development Standard E.1, the Project would contain a minimum of 5,000 square feet of publicly accessible open space located on the ground floor with a direct pedestrian connection to 6th Street and Beacon Street. The publicly accessible open space would not be enclosed by any walls, fences, gates or obstructions and would encompass accent planting, brick paving patterns to match existing conditions and would provide newly planted street trees along all four sides of the project. The open space is lined with 27.5 feet of retail frontage out of a total of 115 feet of open space frontage, for a total of 24%, which is greater than the required 20%. The publicly accessible open space was designed to enhance the pedestrian experience and to meet the goals and guidelines of the Regional Commercial subarea of the San Pedro CPIO.</p> <p>Development Standard E.2 does not apply as the Site does not have any frontage of less than 200 feet of any single street.</p> <p>Development Standard E.3 does not apply as the Site does not front Harbor Boulevard.</p>

<p>hours.</p>	<p>Per Development Standard E.4, the design proposes meeting 5 (items a, b, c, d and f) of the above 6 requirements. The 50% open space requirement has been applied to the Project, reducing the requirement from 31,175 sf to 15,588 sf. The Project would provide 15.588 sf/</p> <p>On 6th, there is 218'-2" frontage, of which 55' would have abutting open space (25%). On Beacon, there is 256'-2" frontage, of which 115' would have abutting open space (45%).</p> <p>Per Development Standard E.5, the open space will be accessible to the public during business hours.</p>
<p>F. Parking and Vehicular Access. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following parking and vehicular access regulations:</p> <p>1. Required Parking.</p> <p>(a) No additional parking shall be required for any change of use within an existing building provided any existing on-site parking is maintained and the use is not prohibited by this CPIO.</p> <p>2. Parking Location and Access.</p> <p>(a) For new construction, vehicle parking areas are prohibited between the Primary Frontage and the Primary Lot Line. Parking shall be provided in surface lots located at the rear or side of the building, or in a semisubterranean or subterranean garage, or a combination of the three.</p> <p>(b) For new construction, side streets or alleys shall provide the primary point of vehicular access for service and parking facilities, unless determined infeasible by the Los Angeles Department of Transportation.</p> <p>(c) For new construction, at-grade or above-grade parking structures shall prohibit parking, storage, mechanical equipment, or similar uses, improvements and equipment on the Ground Floor abutting a street. Such parking structures shall be visually compatible with other structures associated with the Project, in terms of material, color, and other design elements.</p> <p>(d) Curb cuts shall be prohibited on the following streets:</p> <p>(i) 6th Street from Mesa Street to Centre Street; and</p> <p>(ii) Harbor Boulevard.</p> <p>(e) There shall be no more than one driveway per 200 feet of linear frontage for a single development. Each driveway shall</p>	<p>Consistent. There are four existing curb cuts as follows: One driveway on Palos Verdes, one on 6th Street, one on Beacon, and one on 7th Street. These curb cuts will be removed. One new curb cut will be provided on Palos Verdes, north of the current location.</p> <p>Vehicle access (ingress/egress) would be provided via one driveway along Palos Verdes near the northwest corner of the property, providing access through the rear of the building.</p> <p>A ramp will provide vehicle circulation to each parking level (three subterranean levels and one ground level). There will be a gate within Level 1 to separate the commercial parking from the residential parking.</p> <p>The parking would not be visible because three levels would be subterranean and the one ground would be wrapped by residential amenity spaces, retail space, and the shell of the building. It would be visually compatible with the rest of the building due to shared materials, colors, and other design elements such as aluminum panels, and composite siding.</p>

<p>not exceed 30 feet in width, unless determined infeasible by the Director of Planning, in consultation with the Los Angeles Department of Transportation.</p>	<p>The Project incorporates vehicular access such that it does not degrade the pedestrian experience. The vehicular access to the Project's parking has been located on the west side along Palos Verdes, thus avoiding vehicular impacts to the pedestrian experience and circulation along the primary frontage of 6th Street.</p>
<p>G. Landscaping. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following landscaping regulations:</p> <ol style="list-style-type: none"> 1. Along property lines that abut residential uses, Projects shall provide a landscaped buffer area, a minimum depth of two feet, that is planted with trees or vegetation (e.g., bamboo) that grow to a minimum of ten feet. 2. Where a surface parking lot abuts a street, Projects shall provide a landscaped buffer, a minimum depth of two feet, that is located between the parking areas and the property line. The landscaped buffer area shall contain 24-inch box trees planted at ratio of one tree for every ten linear feet. Required trees shall be a minimum of two inches in trunk diameter and ten feet in height at the time of planting. 3. All areas of a site not occupied by buildings, driveways, or open space consistent with Subsection E, shall be landscaped. Eighty percent of landscaped areas shall consist of plant materials that are low maintenance, and native or drought tolerant. 	<p>Consistent. The Project is within its own block and does not abut residential uses.</p> <p>The Project does not propose any surface parking lots. All parking would be within the building (three subterranean levels and one ground level).</p> <p>Although the required landscaping is 3,897 square feet (approximately 25% of the required common open space), the Project seeks to over-landscape and provide approximately 4,423 square feet of landscaping and provide 74 on site trees in lieu of the required 71 trees (1 per 4 dwelling units).</p>
<p>H. Signage. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following signage regulations:</p> <ol style="list-style-type: none"> 1. The following types of signs are prohibited: billboards; pole signs; banners; illuminated architectural canopy signs; inflatable devices; digital, flashing, animated, blinking, or scrolling signs or signs that move; canister wall or canister blade signs; and signs with pliable vinyl letters. 2. Each Premises shall be permitted one wall sign. An additional wall sign is permitted if the Premises abuts another street, alley, or public parking area. Each additional wall sign shall be located on the additional frontage. 3. The total sign area of wall signs shall not exceed 1.5 square feet per each foot of building frontage, up to a maximum size of 100 square feet total. Wall signs facing alleys or parking areas shall not exceed five square feet. 4. In lieu of a wall sign, each Premises shall be permitted one awning sign, to be located over a building or a business entrance. An additional awning sign is permitted in lieu of a permitted wall sign if the Premises abuts another street, alley, or public parking area. Sign letters shall be located on valences only, and letter 	<p>Consistent. The Project will not include a prohibited sign. The Project will comply with the signage requirements.</p>

<p>height should not exceed ten inches.</p> <p>5. Each Premises on the Ground Floor shall be permitted one Pedestrian Sign, limited to a maximum of six square feet in size. Except that each Premises that is located above the first floor may have a Pedestrian Sign on the ground level if there is direct exterior pedestrian access to the second floor business space.</p> <p>6. Where multiple businesses exist, there shall be no more than one projecting sign for every 25 linear feet of Primary Frontage.</p> <p>7. Window signs shall not exceed ten percent of the total window area. In no case shall a window sign exceed four square feet.</p> <p>8. Signs facing alleys or residential¹ zoned areas shall not be internally illuminated.</p>	
<p>I. Appurtenances. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following appurtenance regulations:</p> <ol style="list-style-type: none"> 1. Projects shall provide ancillary lighting along pedestrian and vehicular access ways. 2. Projects are prohibited from using any of the following fencing materials: chain link, barbed wire, razor wire, corrugated metal, and other similar fencing materials. 3. Appurtenant structures, improvements and equipment, including but not limited to, utility equipment, exterior mechanical equipment (including HVAC equipment, satellite dishes and cellular antennas), storage areas, and dumpsters, shall not be visible from public rights-of-way and shall be placed and improved as follows: <ol style="list-style-type: none"> (a) At the rear of the site and be enclosed or screened with landscaping; (b) On the roof and be screened with materials that are architecturally integrated into the building; or (c) If feasible, underground. 4. Utility lines shall be placed underground for all new construction subject to site plan review pursuant to LAMC Section 16.05, to the satisfaction of the Los Angeles Department of Water and Power. 5. Utility boxes or facilities, including electrical transformers, shall be installed below grade, if feasible, to the satisfaction of the Los Angeles Department of Water and Power. 6. No mechanical equipment (such as, air conditioners) shall be permitted in window or door openings. 	<p>Consistent. The Project will comply with the appurtenances requirements.</p>
<p>J. Public Improvements. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following public improvement regulations:</p> <ol style="list-style-type: none"> 1. For Projects with new construction subject to any discretionary review, street trees shall be planted in the adjacent public right-of-way, where feasible, at a ratio of at least one tree for every 25 feet of lot length, to the satisfaction of the Bureau of Street Services. 2. Per LAMC Section 62.08, the San Pedro CPIO shall be treated 	<p>Consistent. The Project would provide newly planted street trees along all four sides of the Project.</p> <p>To satisfy the ratio of at least one tree for every 25 feet of lot length:</p> <ul style="list-style-type: none"> • On 6th, there is 218'-2" frontage, which requires 9 trees. • On 7th, there is 218'-2" frontage, which

as a specific plan subject to its provisions.	<p>requires 9 trees.</p> <ul style="list-style-type: none"> • On Beacon, there is 256-2" frontage, which requires 11 trees. • On Palos Verdes, there is 256-9" frontage, which requires 11 trees. <p>This is a requirement of 40 trees. The Project would remove the 27 street trees and replace with 40 street trees.</p>
<p>Source: San Pedro CPIO, https://planning.lacity.org/odocument/213bd163-9baf-45f3-aa8a-01b4a2adbb2d ZI-2478, Community Plan Implementation Overlay: San Pedro: http://zimas.lacity.org/documents/zoneinfo/ZI2478.pdf</p>	

ZI-1022 Applicability Matrix for Parcel Map/Tract Map Conditions Clearance

This applies to parcel map/tract map conditions.⁹⁵ The Project is not requesting a parcel map/tract map.

ZI-2130 Harbor Gateway State Enterprise Zone

The Site is within an Enterprise Zone/Employment and Economic Incentive Program Area (EZ). The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZ special provisions applicable to plan check include parking standards and height.⁹⁶ The Los Angeles State Enterprise Zone provides reduced parking requirements of 2 spaces for every 1,000 square feet of business, retail, restaurant, bar and related uses (LAMC Section 12.21.A.4(x)(3)6.) Commercial uses include retail. These uses will utilize the Enterprise Zone's reduced parking requirement of 2 spaces for every 1,000 square feet.

Conclusion

The requested discretionary actions do not conflict with existing land uses in the area, and the Project would not introduce incompatible uses. The Project is consistent with SCAG guides and other regional guides, the General Plan, the Community Plan, and the CPIO, to the extent feasible and applicable. Moreover, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project, therefore, considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site, based on detailed review of the relevant documents. As such, impacts would be less than significant.

⁹⁵ <http://zimas.lacity.org/documents/zoneinfo/ZI1022.pdf>

⁹⁶ ZI-2374: <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.11.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to land use. No substantial changes to land use have occurred since certification of the EIR, and no substantial new changes in land use have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.11.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified related to one or more significant effects related to land use not discussed in the Certified EIR, significant effects related to land use previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.11.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on land use, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.11.6 Conclusion

Based on the above, no new significant land use impacts or a substantial increase in previously identified land use impacts would occur as a result of the Project. Therefore, the impacts to land use as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.12 Mineral Resources

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
MINERAL RESOURCES: Would the project:					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

4.12.1 Impact Determination in the Certified EIR

A small portion of the Wilmington Oil Field in the vicinity of the Los Angeles Harbor to the north of the Vincent Thomas Bridge extends into the San Pedro Community Plan. However, there are no active oil wells or water injection wells in that area. There are a few wells in the CPA; all but one is inactive, and the remaining one is idle. The proposed plan and implementing ordinances do not propose and land use changes that would increase the likelihood of mineral resource exploration or extraction, nor would the proposed amendments and zoning and build-out of the proposed plan preclude future exploration/extraction. Therefore, implementation of the proposed plan would not affect any oil and gas resources in the CPA. There are no impacts to oil and gas resources.

There are no active sand and gravel operations in the CPA the state has not classified any deposits underlying the CPA as having value to the state. There is no impact related to MRZ-2 zones.

Mitigation Measures

No impacts related to mineral resources were determined for the Community Plan and no mitigation measures were required.

4.12.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas.⁹⁷ The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.⁹⁸ Therefore, no impact would occur.

As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously Certified EIR.

Mitigation Measures

None required.

4.12.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to mineral resources. No substantial changes to mineral resources have occurred since certification of the EIR, and no substantial new changes in mineral resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.12.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to mineral resources not discussed in the Certified EIR, significant effects related to mineral resources previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

⁹⁷ City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 24, 2020.

⁹⁸ California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed March 24, 2020.

4.12.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have no impact on mineral resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.12.6 Conclusion

Based on the above, no new significant mineral resources or a substantial increase in previously identified mineral resources would occur as a result of the Project. Therefore, the impacts to mineral resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.13 Noise

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Significant and Unavoidable	No	No	No	Yes
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix H** to this Addendum:

H Noise Report and Appendix, DKA Planning, April 2020

4.13.1 Impact Determination in the Certified EIR

Noise

Construction

Depending on the location of construction activities, typical construction noise levels could still exceed 75 dBA despite implementation of mitigation. Implementation of environmental review and mitigation measure MM4.10-1 on a discretionary project level would help to reduce this impact, but not necessarily to less than significant, because certain construction activities may still be required in proximity to nearby sensitive receptors and construction-related noise levels could exceed the 75 dBA threshold. Because specific development projects are not known, this impact would be significant and unavoidable.

Construction activities associated with implementation of projects pursuant to the proposed plan would likely last for a period of several weeks and would generate noise levels at noise-

sensitive uses ranging from 86 dBA Leq to as high as 107 dBA Leq. These noise levels would occur during various stages of individual project construction and could exceed the limits established by the Threshold Guidelines. Implementation of project-level environmental review and mitigation measure MM4.10-1 for discretionary projects would reduce noise levels, but not necessarily below the thresholds of significance. Therefore, this impact would be significant and unavoidable.

Operation

Compliance with LAMC Section 112.02 would ensure that noise levels attributed to new HVAC systems would not increase noise levels above City standards. In addition, implementation of City Building Code regulations would ensure that exterior living spaces, such as porches and patios, are constructed in a manner that noise levels do not exceed City noise standards. Therefore, this impact is less than significant.

Increases in roadway noise levels with the proposed plan would not increase by more than 1.0 dBA CNEL compared to future roadway noise levels without the proposed plan. The greatest project related increase would occur along the roadway of Gaffey Street between Channel Street and Capitol Drive. The vehicle noise levels would result in a 0.6 dBA increase above noise levels without the proposed plan, and therefore, this increase would be considered less than significant.

Vibration

Construction

For sensitive uses that are located at or within 25 feet of project construction sites, sensitive receptors (e.g., residents, school children, and hospital patients) at these locations may experience groundborne noise and vibration levels during construction activities that exceed the FTA's vibration impact threshold of 85 VdB for human annoyance. As long as construction occurs more than 50 feet from sensitive receptors, the impact associated with groundborne noise and vibration generated by the equipment would be below 85 VdB and, thus, would be less than significant. However, as specific site plans or construction schedules are unknown at this time, it may be possible that construction activities could occur as close as 25 feet from sensitive receptors. This would result in these sensitive receptors experiencing groundborne noise and vibration impacts above the threshold of 85 VdB, in which case this impact would be potentially significant. Implementation of project-level environmental review and mitigation measure MM4.10-1 for discretionary projects would help to reduce this impact, but not necessarily to less than significant, because certain construction activities may still be required in proximity to nearby sensitive receptors. Because specific development projects are not known, this impact would be significant and unavoidable.

Operation

Because no substantial sources of groundborne vibration would be built as part of the proposed

plan, no vibration impacts would occur during operation of the proposed plan. Therefore, operational activities related to development projects would not expose sensitive receptors on or off site to excessive groundborne vibration or groundborne noise levels, and this impact is less than significant.

Airport

The nearest airports to the CPA are the Torrance Municipal Airport, which is located approximately 2.3 miles to the northwest, and the Long Beach Municipal Airport approximately 7 miles to the northeast. Furthermore, the CPA is not located within the boundaries of an airport land use plan or airstrip and would not result in excessive noise level exposure for people residing or working in the CPA. No impact would occur.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to noise and vibration:

- MM4.10-1** The CPIO District shall include regulations that require contractors to include the following or comparable construction best management practices in contract specifications and/or printed on plans:
- Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.
 - The construction contractor shall locate construction staging areas away from sensitive uses.
 - When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.
 - Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.
 - Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.

- The construction contractor shall consider potential vibration impacts to older (historic) buildings.

Environmental Standards

The following environmental standards were included in CPIO to reduce impacts related to noise and vibration:

N1 Projects shall include the following or comparable construction best management practices in contract specifications and/or printed on plans:

- a. Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.
- b. The construction contractor shall locate construction staging areas away from sensitive uses.
- c. When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (such as, temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.
- d. Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.
- e. Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.
- f. The construction contractor shall consider potential vibration impacts to older (historic) buildings.

4.13.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

Environmental Setting

Noise-Sensitive Receptors

Land uses sensitive to noise may include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Local receptors mainly include residences and some institutional land uses such as schools and churches. The Project Site is located in the San Pedro Community Plan area of Los Angeles, a mixed neighborhood with multi-family residences and commercial and retail uses. Sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following:

- Multi-family residences, 550 Palos Verdes, 60 feet north of the Project Site.
- The Vue Apartments, 255 West 5th Street, 300 feet northwest of the Project Site.
- La Salle Lofts, multi-family residences, 255 West 7th Street, 370 feet southwest of the Project Site.
- Multi-family residences, 248 West 8th Street; 410 feet southwest of the Project Site.
- Multi-family residences, 225-229 West 8th Street; 430 feet southwest of the Project Site.
- Centre Street Lofts, multi-family residences, 285 West 6th Street; 420 feet west of the Project Site.
- Port of Los Angeles High School, 250 West 5th Street; 610 feet northwest of the Project Site.

Existing Ambient Noise Levels

The Project Site is occupied by a 7,917 square-foot sit-down restaurant, 17,000 square feet of medical offices, and 5,105 square feet of general offices. Noise from these uses is dominated by the 1,677 vehicles that travel to and from the site all four streets that ring the Project Site. Some minor noise is generated by mechanical equipment, such as heating and cooling equipment for the buildings on-site, as well as occasional noise from refuse and recycling trucks and delivery trucks serving the project site.

In March 2020, DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors.⁹⁹ As shown in **Table 4.13-1**, noise levels are generally a function of traffic on local roads. These ambient noise levels are generally consistent with General Plan Noise Element guidelines for mixed-use downtown areas that are influenced by vehicle traffic on local streets or nearby arterials. Other noise sources are typical of residential neighborhoods (e.g., gardeners) and near commercial streets (e.g., HVAC noise, construction).

Table 4.13-1
Existing Noise Levels

Noise Monitoring Locations	Sound Levels (dBA, L _{eq})
1. Port of Los Angeles High School	58.1
2. 222 W 6th Street	71.8
3. Centre Street Lofts	57.3
4. La Salle Lofts	63.7
Source: DKA Planning, 2020	

⁹⁹ Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

Existing Groundborne Vibration

No sources of groundborne vibration were perceptible at any noise monitoring location during the course of the field noise study. It is likely that perceptible groundborne vibrations could occasionally be generated by sources such as garbage trucks and other large trucks (e.g. home delivery vehicles, construction delivery vehicles, cement trucks). However, groundborne vibration levels surrounding the Project Site are by and large imperceptible, suggesting that groundborne vibration levels are generally below the 0.01 inches per second threshold of perception for humans.

Noise

Construction

On-Site Construction Activities

Proposed construction would generate noise during the phased construction process that would span 28 months of grading, building construction, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. The Project would require heavy equipment such as excavators, loaders, and other earthmoving vehicles during the excavation of the subterranean structure. This equipment will generate the greatest noise impacts in general because of the use of diesel-fueled internal combustion engines (**Table 4.13-2**).

Table 4.13-2
Maximum Construction Noise Levels by Equipment Type

Equipment	Noise Level (dBA, L _{max}) ¹
	Reference
Backhoe	80
Compactor	82
Crane	83
Dozer	85
Grader	85
Front End Loader	80
Paver	85
Roller	85
¹ Noise levels derived from the Federal Transit Administration Noise and Vibration Manual, 2018.	

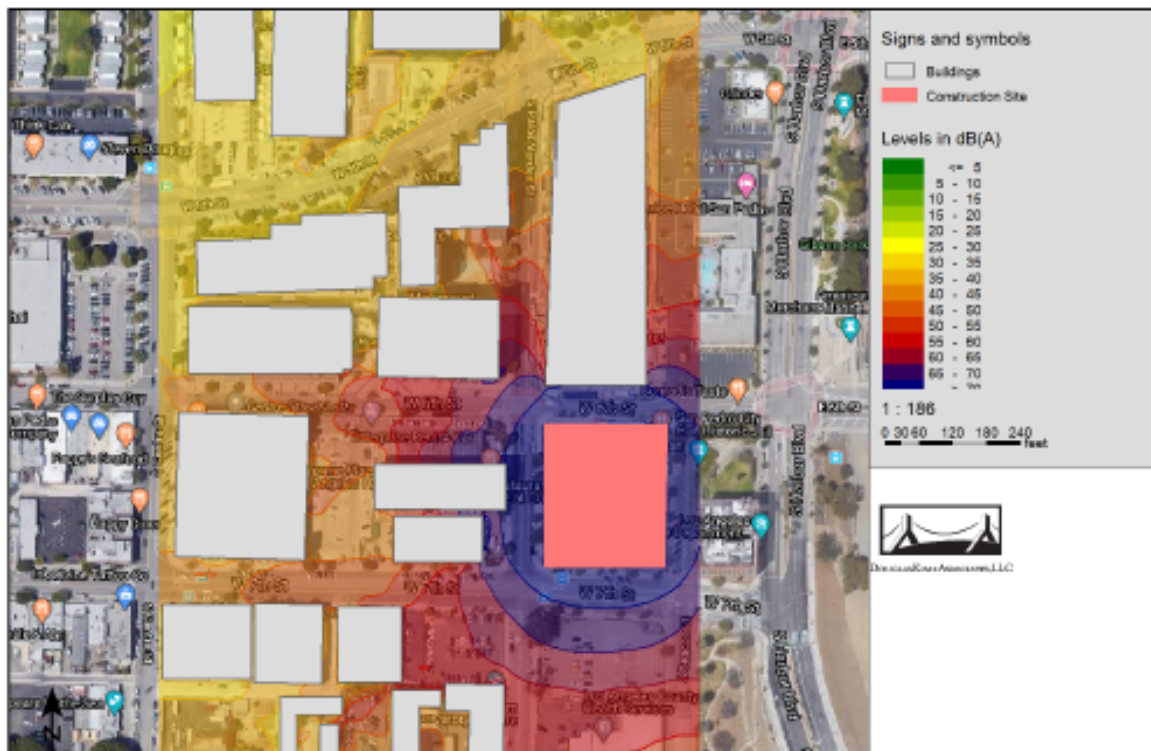
Because **Table 4.13-2** summarizes maximum noise levels for each piece of equipment, actual noise levels would generally be lower for three key reasons. First, equipment does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during the when no noise is generated by that equipment. Second, equipment will often operate away from off-site receptors, as mobile equipment generally does not operate continuously in one place. Third, as

excavation progresses, construction equipment will increasingly operate below grade, where the excavation pit will attenuate sound and block direct line-of-sight to off-site receptors.

During other phases of construction, such as site preparation, paving, or even building construction, noise impacts are generally lesser because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Regardless of the construction activity, compliance with LAMC Section 112.05 would ultimately limit noise levels from powered construction equipment to 75 dBA or below at 50 feet, as the Project Site is within 500 feet of residential zones. This is generally met by using newer, quieter equipment with more effective mufflers to dampen noise from internal combustion engines and warming-up or staging equipment away from sensitive receptors (consistent with General Plan Noise Element Program P11). As shown in **Figure 4.13-1**, noise impacts from construction activities would attenuate rapidly with the presence of nearby structures that would shield receptors from noise impacts. Therefore, compliance with LAMC Section 112.05 would help minimize potential noise impacts from construction equipment.

Figure 4.13-1
Noise Impacts from Construction Activities



When considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase noise by up to 3.5 dBA L_{eq} at nearby sensitive receptors (**Table 4.13-3**). These increases would not exceed the City's 5 dBA threshold in its L.A. CEQA

Thresholds Guide. Therefore, noise impacts from on-site construction activities would be less than significant.

Table 4.13-3
Construction Noise Impacts at Off-Site Sensitive Receptors (without Mitigation)

Building	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase	Significant ?
1. Port of Los Angeles High School	58.1	32.4	58.1	0.0	No
2. 222 W 6th Street	71.8	67.2	73.1	1.3	No
3. Centre Street Lofts	57.3	58.2	60.8	3.5	No
4. La Salle Lofts	63.7	57.9	64.7	1.0	No

Source: DKA Planning 2020

Off-Site Construction Activities – Haul Trucks

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require about 6,850 haul trips (assuming a 10 cubic yard truck capacity) to export soils to off-site landfills. While a final haul route has not been approved, trucks would likely access the northbound Harbor Freeway (SR-110) by traveling west on 6th Street before turning north of Gaffey Street.

According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. The grading phase would average approximately 16 haul trucks per hour over an eight-hour day that would travel along 6th Street and Gaffey Street before accessing freeways to reach landfill locations. A doubling of traffic volumes is required to increase ambient noise levels by 3 dBA. The marginal addition of about 16 haul trucks per hour to local arterials would represent the equivalent of about 32 passenger vehicles, about 7.7 percent of hourly traffic volumes on 6th Street, far less than the doubling of traffic volumes needed to significantly impact existing noise levels.¹⁰⁰ As a result, haul trucks would not double traffic volumes that would be needed to increase ambient noise levels by 3 dBA. As a result, the Project's off-site construction noise impact from haul trucks would be less than significant.

Operation

On-Site Operational Noise Sources

¹⁰⁰ City of Los Angeles Department of Transportation, Manual Traffic Count Summary October 7, 1999.
<http://navigate.lacity.org/print/temp/C5E501E9-D3A3-3ED6-D2AC41C06A5E9D81.pdf?CFID=43687096&CFTOKEN=8fac0648a45e6598-C5E49685-D3A3-3ED6-DFED2C61EA66E822>

During operations, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance adopted by this analysis. As a result, the Project's on-site operational noise impacts would be less than significant.

Mechanical Equipment. HVAC equipment would be located on the building rooftop (), approximately 85 feet above street level, where rooftop units (RTUs) would be set back from the edge of the roof. While this equipment could generate a sound pressure level of up to 81.9 dBA at one foot, the elevation of this noise source and the presence of a roof edge and parapet create a natural noise barrier that reduces noise levels from rooftop HVAC units by 8 dBA or more.¹⁰¹ This is helpful in managing noise, as equipment often operates continuously throughout the day, evening, and night. This assumes both attenuation from both the roof edge and the proposed rooftop enclosure for the HVAC equipment.

Vaults that house pool and spa equipment and pumps, as well as utility fan rooms, and other operational equipment would be located within the three subterranean parking levels and the ground floor. All equipment would be fully enclosed within the structure and produce de minimis noise impacts for off-site sensitive receptors. Regulatory compliance with LAMC Section 112.02 would further ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, the relatively quiet operation of modern rooftop-mounted HVAC systems, and distances to receptors, it is unlikely that noise from the Project's HVAC systems would be audible at off-site locations.

Auto-Related Activities. The Project would include three subterranean parking levels that would accommodate the Project's parking spaces. Residents and those accessing retail uses would enter the Project Site from Palos Verdes Street, the garage entrance for which faces west, approximately 70 feet from the Crowne Plaza Hotel. Cars that enter into the subterranean parking garage would generate minor sources of noise (e.g., tire squeal, slamming vehicle doors) that would be contained within the parking structure, as the subterranean garage would be fully enclosed on all sides.

Given the distance of sensitive receptors and the relatively low volume of traffic entering and exiting the subterranean garage on Palos Verdes Street, on-site auto-related activity would have virtually no impact on nearby sensitive receptors. As such, the Project's parking garage would have no noticeable effect on the surrounding noise environment.

Residential and Retail Uses. Noise associated with residential and retail uses would include a variety of operational sources, including human conversation and activities, recreation facilities,

¹⁰¹ City of Moreno Valley, Moreno Valley WalMart Noise Impact Analysis, Table 901; February 10, 2015 and City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014.

trash collection, landscape maintenance, and commercial loading operations. These are discussed below:

- Human conversation and activities. Noise associated with everyday human activities would largely be contained internally within the Project. Noise associated with outdoor residential activities could include passive activities such as human conversation and socializing on any of the proposed outdoor areas:
 - Interior courtyard on Level 2, shielded on three sides by the development. Any activity in this courtyard would emit noise eastward toward Beacon Street and the park outside the County's Public Works building.
 - Interior pool deck on Level 2, shielded on three sides by the development. Any activity in this deck would emit noise southward toward 7th Street and a surface parking lot.

These outdoor spaces represent gathering places for outdoor activities that are both private and group oriented. These would be intermittent activities that would produce negligible impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.¹⁰²

While the noise levels from the outdoor spaces on Level 2 would be marginal, the attenuation from the built environment would virtually eliminate any exposure to elevated noise levels at the nearest sensitive receptors. Noise from speech and conversation generally does not exceed approximately 65 dBA at a reference distance of one meter. These noises attenuate rapidly and would not be capable of elevating surrounding ambient noise levels by more than a nominal degree. Given the absence of sensitive receptors near these outdoor recreation areas, any noise from human conversation and recreation activities would be negligible for sensitive receptors that are generally located to the north and west of the Project Site.

Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generate 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.¹⁰³ However, given the limited landscape plan for the Project, such equipment is not expected to be used substantially in exterior spaces. As such, any intermittent landscape equipment would operate during the day and represent a negligible impact and ultimately be subject to compliance with LAMC Section 112.04 governing powered equipment in residential areas, Section 112.05

¹⁰² Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

¹⁰³ Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

governing powered equipment and hand tools, LAMC Section 112.06 regulating amplified equipment in a place of public entertainment, and other nuisance regulations.

Trash collection. On-site trash and recyclable materials would be managed and picked-up on subterranean Level B1, where trash and recycling trucks would access these facilities from Palos Verdes Street. Solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.¹⁰⁴ LAMC Section 113.01 also regulates noise from garbage collection and disposal.

Commercial loading. On-site loading and unloading activities would be managed on subterranean Level B1, where trucks would access these facilities from Palos Verdes Street. This area is fully enclosed by the parking garage and would have no direct line-of-sight to off-site receptors. As a result, there would be negligible noise impacts on off-site receptors. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10 P.M. and 7 A.M.

The impact of on-site operational noise sources would be less than significant.

Off-Site Operational Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily vehicle trips. On a typical weekday, the Project is forecast to generate an estimated 247 net new daily trips.¹⁰⁵ Based on hourly distribution data from the Institute of Traffic Engineers, this would produce a new increase of no more than 22 net hourly vehicle trips in the morning peak hour and 30 net trips in the afternoon peak hour. This would represent less than seven percent of vehicle traffic on 6th Street, far less than the doubling of traffic volumes needed to significantly impact existing noise levels.¹⁰⁶ As such, traffic generated by the Project would have negligible impacts on noise levels along local roadways. Twenty-four hour CNEL impacts would similarly be minimal, far below the Thresholds Guide criteria for significant operational noise impacts, which begin at 5 dBA. As such, this impact would be less than significant.

The addition of future traffic from any other new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's contribution to permanent cumulative off-site ambient noise level increases would similarly be negligible. As a result, the Project's cumulative operational noise impact would be less than significant.

Vibration

¹⁰⁴ RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003

¹⁰⁵ Trip Generation Assessment, Crain and Associates, March 21, 2020.

¹⁰⁶ City of Los Angeles Department of Transportation, Manual Traffic Count Summary October 7, 1999.

<http://navigatela.lacity.org/print/temp/C5E501E9-D3A3-3ED6-D2AC41C06A5E9D81.pdf?CFID=43687096&CFTOKEN=8fac0648a45e6598-C5E49685-D3A3-3ED6-DFED2C61EA66E822>

Construction

On-Site Sources

Construction of the Project would require large steel-tracked earthmoving equipment such as excavators and dozers, particularly during the grading phase. Though these vehicles may be capable of generating maximum vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet, it is important to note that these vehicles would not be capable of operating directly where the Project's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability, in addition to operating at reduced power and intensity to maintain precision at these locations.

As a result, vibration levels of 0.089 inches per second PPV, representative of maximum, peak operations, would not be generated at the property lines of the Project. Smaller, more maneuverable and precise equipment and techniques capable of fine grading at property lines would only generate maximum vibration levels of 0.003 inches per second PPV. **Table 4.13-4** shows the Project's estimated construction vibration impacts at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration as a result of the Project's construction activities, and more distance structures would experience lesser impacts. Therefore, the Project's vibration impacts as generated by on-site construction activities would be less than significant.

Table 4.13-4
Building Damage Vibration Levels – Construction

Building	Distance (feet)	Condition ¹	Significance Criteria (in/sec) ¹	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
Large Dozer-Type Equipment					
San Pedro Municipal Building	60	III. Non-engineered timber and masonry	0.2	0.088	No
Crowne Plaza Hotel	60	I. Reinforced concrete, steel or timber	0.5	0.037	No
222 W 6th Street	110	I. Reinforced concrete, steel or timber	0.5	0.020	No
Small Dozer-Type Equipment					
San Pedro Municipal Building	60	III. Non-engineered timber and masonry	0.2	0.001	No
Crowne Plaza Hotel	60	I. Reinforced concrete, steel or timber	0.5	0.000	No
222 W 6th Street	110	I. Reinforced concrete, steel or timber	0.5	0.000	No
¹ Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual. Source: DKA Planning, 2020					

Building Damage Vibration Impact – Off-Site Sources

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks,

pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require haul trips to export soils to off-site landfills. While a haul route has not been finalized, trucks would likely use 6th Street to access Gaffey Street northbound, bypassing local collector roads. Haul trucks would generate occasional noise events at receptors during passbys, but such intermittent noise events would have a limited effect on surrounding ambient noise levels on 7th Street or Gaffey Street. As a result, the Project's off-site construction noise impact from haul trucks would be consistent with the Municipal Code.

As discussed earlier, construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.¹⁰⁷ According to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would be less than significant.

Operational Vibration Sources

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations, as the Project would be a residential development. The Project's long-term vibration impact from operational sources (primarily passenger vehicles) would be nominal and less than significant.

Airport Noise

The Project would not expose people to excessive noise levels related to the operation of a public airport or private airstrip. The Project is not within an airport hazard area.¹⁰⁸ The Project Site is not located within two miles of a public airport:

- Torrance Airport is located 5.5 miles to the northwest.
- Long Beach Airport is located 8.5 miles to the northeast.
- Los Angeles International Airport (LAX) is approximately 15 miles to the northwest.
- Santa Monica Municipal Airport is located 21 miles to the northwest.

¹⁰⁷ Federal Transit Administration, “Transit Noise and Vibration Impact Assessment,” May 2006, Figure 7-3.

¹⁰⁸ ZIMAS search: <http://zimas.lacity.org/>.

- Hollywood Burbank Airport (Bob Hope Airport) is 31 miles to the north.

There are no nearby private airstrips. The Goodyear Blimp Airbase in Carson is located approximately 6 miles to the south.

Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore no impact would occur.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to noise, the Project would nevertheless implement Mitigation Measure MM4.10-1 from the Certified EIR.

MM4.10-1 is a condition of approval of all applicable discretionary projects and are best management practices for construction.

Environmental Standards

The Project would implement Environmental Standard N1 from the CPIO. N1 is the same as MM4.10-1 and are best management practices for construction.

4.13.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.13.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.13.5 Mitigation Measures Addressing Impacts

As stated above, the Project would implement Mitigation Measure MM4.10-1 from the Certified EIR.

The Project would also comply with Environmental Standard N1 from the CPIO.

4.13.6 Conclusion

Based on the above, no new significant noise impacts or a substantial increase in previously identified noise impacts would occur as a result of the Project. Therefore, the impacts to noise as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.14 Population and Housing

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less Than Significant	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less Than Significant	No	No	No	No

4.14.1 Impact Determination in the Certified EIR

Based on reasonably expected build-out of the CPA in 2030, implementation of the proposed plan would result in growth that, combined with growth identified in the thirty-four other Community Plans, is consistent with SCAG 2030 projections for the City as a whole. The proposed plan allows for intensification of residential development in the established downtown area, not an undeveloped area, promoting reduction in vehicle miles traveled (VMT); this reduction in VMT, in turn, results in a beneficial impact on air quality, noise, and greenhouse gas emissions, all beneficial impacts of this type of development. The proposed plan would also provide new employment opportunities, but would not exceed employment projections or include employment-generating uses that would induce substantial growth. As such, implementation of the proposed plan would not cause growth or accelerate development in an undeveloped area that exceeds adjusted SCAG 2030 projections, and would not result in substantial adverse physical changes in the environment. Based on the analysis provided above, a less-than-significant impact relating to population, housing, and employment growth would occur.

The proposed plan would be subject to all policies and provisions of applicable City and regional plans and ordinances relating to housing. Adoption of the proposed plan would result in the refinement and amendment of any applicable Citywide Elements of the General Plan including the General Plan Framework and Housing Element. This would ensure that future development occurring under the proposed plan would be consistent with policies of the City's General Plan. Policies of the proposed plan address affordable housing, anticipated growth, and a range of other issues relating to housing. Compliance with these policies through the proposed plan's implementation programs, as well as all other applicable policies and ordinances, would ensure

that the proposed plan would not result in inconsistencies with adopted City and regional housing policies. As such, a less-than-significant impact would occur.

Mitigation Measures

Impacts related to population and housing were determined to be less than significant for the Community Plan, and therefore, no mitigation measures were required.

4.14.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to population and housing were accounted for within the analysis contained in the Certified EIR.

According to SCAG's State-approved 2014 RHNA, the City of Los Angeles is in need of 82,002 housing units, an annual average of about 10,250 new dwelling units per year, for eight years (through 2021). The City is launching the 2021-2029 Update to the Housing Element, a state-mandated Element of the General Plan. It is expected to be adopted by the end of 2020.

Table 4.14-1, Population, Households, and Employment in the City of Los Angeles, includes the 2020 (baseline) and 2024 (buildout year) population¹⁰⁹, households¹¹⁰, and employment¹¹¹ values from SCAG's 2016-2040 RTP/SCS.

**Table 4.14-1
Population, Households, and Employment in the City of Los Angeles**

Year	Population	Households	Employment
2020	4,063,756	1,429,732	1,831,356
2024	4,172,884	1,481,848	1,898,884
Projected Growth	+109,128	+52,116	+67,528
Population, housing, and employment calculated based on linear interpolation of 2020 and 2024 values. Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf Table: CAJA Environmental Services, March 2020.			

¹⁰⁹ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Population between 2012 (3,845,500) and 2040 (4,609,400) is projected to grow by 763,900 over the 28-year period, or 27,282 per year average.

¹¹⁰ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Households between 2012 (1,325,500) and 2040 (1,690,300) is projected to grow by 364,800 over the 28-year period, or 13,029 per year average.

¹¹¹ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012 for the baseline and buildout years. Employment between 2012 (1,696,300) and 2040 (2,169,100) is projected to grow by 472,700 over the 28-year period, or 16,882 per year average.

The Project would also be within the population and housing projections of the 2020-2045 RTP/SCS.¹¹² According to SCAG's 2020-2045 RTP/SCS, the population in 2020 is approximately 4,049,317 persons and in 2024, approximately 4,164,834 persons, an increase of 115,517 persons. According to SCAG's 2020-2045 RTP/SCS, in 2020 there are approximately 1,429,729 households and in 2024, there are approximately 1,481,841 households, an increase of 52,112 households.

Population generation is shown in **Table 4.14-2**. It is estimated that the Project would have approximately 677 residents.

Table 4.14-2
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Residential	281 units	2.41 person / unit	677
Note: unit = dwelling unit Source: The source for the 2.41 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. Table: CAJA Environmental Services, March 2020.			

Employee generation is shown in **Table 4.14-3**. It is estimated that the Project would have approximately 7 employees. This is conservative and does not take credit for the removal of existing uses (the office and restaurants buildings and its employees).

Table 4.14-3
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Commercial	2,316 sf	1 employee / 369 sf	7
Note: sf = square feet Source: LAUSD 2020 Developer Fee Justification Study, March 2020. Table 14. Table: CAJA Environmental Services, March 2020.			

There is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs. Rather the jobs could be filled by workers already counted within the Los Angeles area.

As shown in **Table 4.14-4**, the estimated 677 new residents generated by the Project would represent approximately 0.6 percent of the population growth forecasted between 2020 and 2024 from **Table 4.14-1**. Therefore, the Project's residents would be well within SCAG's projection for the City of Los Angeles.

¹¹² 2020-2045 RTP/SCS, Demographics and Growth Forecast: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

The Project's 281 new residential units would constitute up to approximately 0.54 percent of the housing growth forecasted between 2020 and 2024 from **Table 4.14-1**. Therefore, the Project's housing units would be well within SCAG's projection for the City of Los Angeles.

The Project's 7 new employees would constitute up to approximately 0.01 percent of the employee growth forecasted between 2020 and 2024 from **Table 4.14-1**. Therefore, the Project's employees would be well within SCAG's projection for the City of Los Angeles. This is a conservative growth as some employees could come from the area.

**Table 4.14-4
Project Impacts**

	Project	Projected Growth	% of Growth
Population	677	+109,128	0.6
Households	281	+52,116	0.54
Employment	7	+67,528	0.01
Table: CAJA Environmental Services, December 2020.			

As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. The Project Site does not currently provide housing but will add 281 housing units. The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.¹¹³ Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area. By developing new residential dwelling units, the Project would help to fulfill this demand.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.14.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

¹¹³ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

4.14.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population and housing have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

4.14.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on population and housing impacts, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.14.6 Conclusion

Based on the above, no new significant population and housing impacts or a substantial increase in previously identified population and housing impacts would occur as a result of the Project. Therefore, the impacts to population and housing as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.15 Public Services and Recreation

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
(a) Fire protection?	Less Than Significant	No	No	No	No
(b) Police protection?	Less Than Significant	No	No	No	No
(c) Schools?	Less Than Significant	No	No	No	No
(d) Parks?	Less Than Significant	No	No	No	No
(e) Other public facilities?	Less Than Significant	No	No	No	No

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
RECREATION					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant	No	No	No	No
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix I** to this Addendum:

- I-1 Police Response, Los Angeles Police Department, May 27, 2020
- I-2 Schools Response, Los Angeles Unified School District, July 24, 2020
- I-3 Parks Response, Los Angeles Department of Recreation and Parks, May 8, 2020
- I-4 Library Response, Los Angeles Public Library, May 5, 2020

4.15.1 Impact Determination in the Certified EIR

Fire

The areas within the CPA targeted for growth are served by existing fire stations, but some expansion of the existing facilities or construction of new facilities may be required to serve additional development over time. However, as discussed above, existing operational structures, policies, and regulations will ensure that the LAFD can adequately plan for and serve the new growth. Based on reasonably expected build-out of the CPA in 2030, implementation of the proposed plan would result in growth that is consistent with the City's General Plan Framework population forecast of 88,927 for San Pedro. The proposed plan capacity is also consistent with SCAG 2030 projections for the City as a whole. These projections are the same that public service providers, City departments and other government agencies rely on for long range planning. Therefore, on a program level, implementation of the proposed plan and implementing ordinances would not cause the construction of a new fire station. Impacts are less than significant.

Police

The increase in people and dwelling units in the CPA created through development allowed under the proposed plan could potentially increase the demand for police protection services. However, due to the mobile nature of police services, it is unlikely that the need for additional officers created by the increase in demand for police services would result in the need for the construction of new or physically altered police protection facilities. Additional police service demands can be accommodated through a variety of ways, including overtime or provision of substations in existing structures, which would increase police protection without the need for construction of new stations. As discussed above, existing operational structures, policies, and regulations will ensure that the LAPD can adequately serve new development. Based on reasonably expected build-out of the CPA in 2030, implementation of the proposed plan would result in growth that is consistent with SCAG 2030 projections for the City as a whole. This increase in population and housing units is not sufficient to lead to a substantial increase in the need for police protection services. Impacts are less than significant.

School

The state has a mechanism in place to collect funding needed to improve schools. Any future development that would occur as a result of the plan and implementing ordinances would be

subject to California Education Code Section 17620(a)(1), which 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. Additionally, future projects would be subject to the Leroy F. Greene School Facilities Act of 1998 (SB 50), which sets a maximum level of fees a developer may be required to pay to reduce a project's impacts on school facilities. The provisions of 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). In addition, standard City mitigation measures provide for the payment of appropriate fees to offset school impacts.

Furthermore, proposed Community Plan policies CF4.1 through CF4.4 and existing GPF policies would help to minimize impacts to schools. GPF Policies 9.31.1, 9.32.1 through 9.32.3, 9.33.1, and 9.33.2 call for the City to participate in the development of demographic estimates for school planning, to cooperate with LAUSD to expand schools facilities commensurate with population growth, explore alternatives for new school sites, and to strategize on planning and access for school facilities. Compliance with existing regulations would ensure this impact remains less than significant.

Parks and Recreation

Existing GPF Policies 9.22.1, 9.23.1 through 9.23.8, 9.24.1, 9.24.2, 9.25.1, and 9.25.2 call for the City to monitor park and recreation statistics to identify existing and future park and recreation needs in the City, develop a strategy to purchase and develop parks, prioritize park projects in areas of the City with the greatest existing deficiencies, establish joint-use agreements with LAUSD to expand recreational opportunities, and to maximize the opportunities to develop parklands, including nontraditional public park spaces. Compliance with existing regulations would ensure this impact remains less than significant.

Libraries

The available public library services in the San Pedro CPA, in terms of library space and permanent volume collection, are currently inadequate to meet existing demands from the community's residents based on state library standards. However, on completion of the proposed West San Pedro Branch, 0.41 sf of library facilities would be provided per person (based on Community Plan capacity of 83,354). This is slightly lower than the state standard of 0.5 sf per person. However, on-line services and virtual libraries with computer workstations that provide access to the library's on-line catalog, extensive information databases, multimedia software for students, and free Internet searching for the public may lessen the adverse impacts resulting from a mismatch between available physical library space and resources and the community's need for library facilities. In addition, the existing library is not at full capacity and could provide 13,000 additional volumes, which would further reduce the impact. Therefore, it is not anticipated that additional library locations would be required to serve CPA residents. As such, the impact of the proposed plan is less than significant.

Mitigation Measures

Impacts related to public services were determined to be less than significant for the Community Plan, and therefore, no mitigation measures were required.

4.15.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to public services and recreation were accounted for within the analysis contained in the Certified EIR.

Fire

The Project Site is served by several fire stations, as shown in **Table 4.15-1, Fire Stations**.

**Table 4.15-1
Fire Stations**

No.	Address	Driving Distance	Equipment	Response Time	Incident Counts
112	444 S. Harbor Blvd.	1,000 feet	Engine Paramedic Ambulance Fire Boat Emergency Lighting Trailer Medical Supply Trailer EMS Battalion Captain	EMS: 6:23 min Non-EMS: 5:35 min	EMS: 1,563 Non-EMS: 252
48	1601 S. Grand Ave.	1.0 miles	Light Force Assessment Engine Rescue Ambulance Haz-Mat Squad	EMS: 6:17 min Non-EMS: 5:48 min	EMS: 2,346 Non-EMS: 360
Year 2020 (January to December). Non-EMS is fire emergency. EMS is emergency medical service. Light Force: Truck company and single fire engine. Task Force: Truck company and two fire engines. LAFD September 2019 Fire Station Directory. Table: CAJA Environmental Services, February 2021.					

Construction Impacts

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As construction activities are temporary in nature and emergency vehicles have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel and/or driving in opposing traffic lanes, construction of the

Project would not impact LAFD services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives during construction of the Project.

Operation

Response Distance

The Project Site is located within the response distance specified by Table 507.3.3 of the Fire Code. Station No. 112 is approximately 1,000 feet from the Site and contains an engine. An engine alone is not enough to satisfy the requirements of the Fire Code. Station No. 48 is approximately 1 mile from the Site and contains a Light Force (truck company and engine company)¹¹⁴ and additional engine and ambulance. The Project is within the most strict 1.5 mile distance requirement for a high density residential and neighborhood commercial development.

Additionally, the Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.¹¹⁵

Emergency Access

¹¹⁴ LAFD: <http://www.lafd.org/about/about-lafd/apparatus>.

¹¹⁵ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847.

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts would be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements 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 any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire flow is set at 4,000 gpm from four adjacent fire hydrants flowing simultaneously. The following fire hydrants are the nearest to the Project Site:¹¹⁶

- Hydrant (ID 429, size 4D, 12-inch main) on southwest corner of Palos Verdes and 6th.
- Hydrant (ID 2732, size 4D, 12-inch main) on northwest corner of Palos Verdes and 7th.
- Hydrant (ID 430, size 4D, 12-inch main) on southwest corner of Palos Verdes and 7th.
- Hydrant (ID 417, size 4D, 8-inch main) on southwest corner of Beacon and 7th.

Upgrades to the hydrants and system will be evaluated at the plan check phase as is standard City practice. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the Project area is sufficient as is standard practice. If it is not, then upgrades to the existing infrastructure may be required. No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site.

The Project will comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access. Those recommendations will be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. This will allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Police

¹¹⁶ Navigate LA, Fire Hydrants Layer: <http://navigatela.lacity.org/navigatela/>.

The Project Site is served by the City of Los Angeles Police Department's (LAPD) South Bureau, which oversees LAPD operations in the 77th Street, Harbor, Southeast, and Southwest areas.¹¹⁷ The Harbor Community Police Station, located at 2175 John. S Gibson Boulevard, is approximately 1.8 mile driving distance from the Project Site. The Harbor Community service area is 27 square miles in size has approximately 171,000 residents.¹¹⁸ The station is staffed with 275 officers.¹¹⁹

The Harbor area ratio of officers to residents is 1:622.¹²⁰

The Citywide ratio of officers to residents is 1:403.¹²¹

The median response time for Harbor area is 5.7 minutes for Code-3 (Very Urgent) calls, 19.2 minutes for Code-2 (Urgent) and 41.0 minutes for non-coded calls. Harbor Area's median response times are the same or quicker than the South Bureau and City median response times.¹²²

Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open around its boundaries. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts would be less than significant.

Operation

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours due to the residential uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors.

¹¹⁷ LAPD, South Bureau: http://www.lapdonline.org/south_bureau

¹¹⁸ LAPD: http://www.lapdonline.org/harbor_community_police_station

¹¹⁹ Police Response, Los Angeles Police Department, May 27, 2020.

¹²⁰ LAPD: 275 officers for a population of 171,000 as of May 2020.

¹²¹ LAPD: 9,990 officers for a population of 4,029,741 as of March 2020.

¹²² Police Response, Los Angeles Police Department, May 27, 2020.

The potential for crime can be reduced with site-specific designs and features. The Project will include standard security measures such as adequate security lighting, secure key access to residential areas, and residential lobby and leasing area that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade levels and as part of the building.

The LAPD will require that the commanding officer of the Community Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

The Project-generated residents (677 persons) would equate to approximately 1 officer based on the current ratio.¹²³ This represent a 0.4 percent increase over existing staffing.¹²⁴ This change is not substantial and the Project will contribute sales and property tax revenue into the City's General Fund, which can be used to fund additional resources per the planning and deployment strategies of the LAPD. The Project will not require the construction of a new or expanded police station. Impacts associated with police services would be less than significant.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.¹²⁵

The following Project Design Features (PDF) are proposed with regard to police protection:

PDF-PUB-1 Prior to the start of construction, temporary fencing will be placed along the periphery of the active construction areas to keep unpermitted persons from entering the construction area and to screen construction activities from view. The perimeter fence will have gates installed to facilitate the ingress and egress of equipment and construction workers. Where applicable, the construction fence will incorporate a pedestrian walkway with temporary lighting. Should sections of

¹²³ $677 / 648 = 1.05$

¹²⁴ $1 / 264 \times 100\% = 0.37$

¹²⁵ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

the construction fence have to be removed to facilitate work in progress, barriers and or K-rails will be installed to prevent public entry and theft.

PDF-PUB-2 The Project will provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. These measures include, but are not limited to, the following:

- Perimeter lighting to supplement the street lighting and to provide increased visibility and security
- Camera security system

PDF-PUB-3 Prior to the issuance of a certificate of occupancy, the Division commanding officer will be provided with a diagram of each portion of the property. The diagram will include access routes and any additional information that might facilitate police response.

Schools

The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:¹²⁶

- Cabrillo Avenue Elementary (K-5), located at 732 S. Cabrillo Avenue
- Richard Henry Dana Middle (6-8), located at 1501 S. Cabrillo Avenue
- San Pedro High (9-12), located at 1001 W. 15th Street

As shown on **Table 4.15-2**, the Project (directly through the residential use and indirectly through its employees) would generate an increase of approximately 65 elementary, 18 middle, and 38 high school students, for a total increase of approximately 121 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table 4.15-2
Project Estimated Student Generation

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential	281 units	64	17	37	118
Commercial	2,316 sf	1	1	1	3
Total		65	18	38	121
The generation factor is from the Los Angeles Unified School District, 2020 Developer Fee Justification					

¹²⁶ LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>.

**Table 4.15-2
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Study, March 2020. Students per household: 0.2269 elementary, 0.0611 middle; 0.1296 high school. Students per 1,000 sf: 0.610 for neighborhood shopping centers, 1.077 for standard office Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 54.3 percent for elementary, 14.6 percent for middle, and 31.0 percent for high school. Table: CAJA Environmental Services, March 2020.					

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 requirements against any construction within the boundaries of the district, for the purposes 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 California Education Code Section 17620. 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 provisions of 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 law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts would be less than significant.

Parks and Recreation

The Project would provide 5,000 square feet of publicly accessible community open space on the northeast corner of the building (6th and Beacon) per CPIO Chapter II.E.¹²⁷

The Project would increase the number of residents and employees at the Project Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include open space, a pool, an amenities deck and fitness use, and private open space and decks. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities. The City requires developers to dedicate parkland or pay applicable fees (such as dwelling unit construction tax or other applicable park fee) in lieu of parkland dedication. The Project is required to comply with payment of applicable park fees (Quimby or

¹²⁷ San Pedro CPIO: <https://planning.lacity.org/odocument/213bd163-9baf-45f3-aa8a-01b4a2adbb2d>

otherwise). However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

Libraries

Table 4.15-3 describes the libraries that would serve the Project.

**Table 4.15-3
Los Angeles Public Libraries**

Name	Address	Size (sf)	Volumes / Circulation	Population	Staff
San Pedro Regional	931 S. Gaffey Street	20,000	72,612 / 95,858	81,495	14
Staffing is full-time equivalent. Current Service – LA Times Mapping LA and branch library community boundaries. The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan. Response, Los Angeles Public Library, May 5, 2020 Table: CAJA Environmental Services, June 2020.					

A new branch is recommended when a community reaches a population of 90,000. The current regional branch serves 81,495 persons. The Project would add 677 persons. The new service population would still be below the recommendation to add an additional branch.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations^{128,129}. Further, Measure L has provided funds to restore adequate services to the existing library system.

¹²⁸ "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": <http://www.nea.gov/research/toread.pdf>.

¹²⁹ "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

The existing San Pedro library meets the library facilities standards in terms of the size of the building for the population served based on LAPL standards.¹³⁰

For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.15.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.15.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.15.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on public services, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.15.6 Conclusion

¹³⁰ San Pedro Community Plan, 2017: https://planning.lacity.org/odocument/ee5aacb-fce7-4dc2-9f91-2df177a48417/San_Pedro_Community_Plan.pdf, accessed March 25, 2020.

Based on the above, no new significant public services impacts or a substantial increase in previously identified public services impacts would occur as a result of the Project. Therefore, the impacts to public services as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.16 Transportation

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
TRANSPORTATION / TRAFFIC: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant and Unavoidable	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? ¹³¹	Not Applicable	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact	No	No	No	No
(d) Result in inadequate emergency access?	No Impact	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix J** to this Addendum:

J-1 Trip Generation Assessment, Crain and Associates, March 21, 2020

J-2 Approval Letter, Los Angeles Department of Transportation, June 10, 2020

4.16.1 Impact Determination in the Certified EIR

Conflicting with Plans, Programs, Ordinances, or Policies

The City requires that all development plans are submitted to the City for review and approval to ensure that all new development has adequate emergency access, including turning radius in compliance with existing City regulations. Construction and operation activities within the CPA with respect to emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which coordinates with the Police and Fire Departments to ensure that emergency access is maintained at all times. Plan policies and guidelines, existing rules and regulations would help ensure that emergency access is maintained at all times, and would reduce this impact, but not to less than significant. Therefore this impact would be considered

¹³¹ This threshold was changed after the Certified EIR. Previously it examined: 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?

significant and unavoidable. The program-level environmental clearance for the proposed Community Plan does not eliminate future environmental review for any discretionary specific project level development. Future development requiring discretionary action will be evaluated under project-level environmental clearance.

Conflict with Congestion Management Program

Implementation of the proposed plan could 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. Therefore, this impact is significant and unavoidable.

Design Hazard

The San Pedro Community Plan and implementing ordinances do not propose specific development projects. Therefore, it is unknown whether future projects implemented under the San Pedro Community Plan would contain sharp curves, dangerous intersections, or incompatible uses that could present safety hazards. None of the design guidelines included in the San Pedro Community Plan would promote such design features. As each development project undergoes environmental review, an assessment will be required to determine if the project contains such features, which would require design changes or mitigation consistent with City of Los Angeles and LADOT requirements. On a program level, there is no impact with respect to safety hazards resulting from design features.

Emergency Access

The San Pedro Community Plan would create new housing options, mostly downtown and in areas identified for mixed use, in accordance with Framework guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. The San Pedro Community Plan seeks to direct growth away from existing residential neighborhoods towards transit-oriented districts and corridors in commercial centers. The proposed plan would facilitate consistency with regional plans and policies, as well as Framework policies, by reducing vehicle miles traveled and promoting the use of transit and alternative modes of transportation. Therefore, there is no impact with respect to emergency access.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

No feasible mitigation measures.

4.16.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to transportation were accounted for within the analysis contained in the Certified EIR.

Methodology

SB 743, made effective in January 2014, required the Governor's Office of Planning and Research to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay (level of service [LOS]) to VMT, with the intent of reducing greenhouse gas emissions (GHG), creating multimodal networks, and promoting mixed-use developments.

On July 30, 2019, the Los Angeles City Council approved revisions to the City's transportation analyses approach to incorporate new screening procedures and thresholds compliant with SB 743. LADOT's Transportation Assessment Guidelines (TAG) defines and provides the required methodology of analyzing a project's transportation impacts in accordance with SB 743.

Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying significant impacts:

- *Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies*
- *Threshold T-2.1: Causing Substantial Vehicle Miles Traveled (VMT)*
- *Threshold T-2.2: Substantially Inducing Additional Automobile Travel*
- *Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use*
- *Threshold T-4: Result in Inadequate Emergency Access*

These thresholds are reviewed and analyzed below.

Conflicting with Plans, Programs, Ordinances, or Policies

Table 2.1-1 of the TAG provides the City plans, policies, programs, ordinances, and standards relevant in determining project consistency. Table 2.1-2 of the TAG provides a list of questions to help guide whether a project conflicts with the City's plans, programs, ordinances, or policies. As discussed below, the Project is consistent and does not conflict with the City's plans, policies, programs, ordinances, and standards listed in Table 2.1-1 of the TAG. Therefore, the Project would not result in a significant impact under Threshold T-1. Detailed discussions of the plans, programs, ordinances, or policies related to the Project are provided below.

Mobility Plan

Policy 2.3 Pedestrian Infrastructure – Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

While this is a citywide policy, the Project would support its implementation. Specifically, one of the primary objectives of the Project is to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include street trees around the Site, pedestrian-scale lighting fixtures and elements, and open space. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network – Provide a slow speed network of locally serving streets.

This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

While this is a citywide policy, the Project would not conflict with its implementation. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Therefore, the Project would not conflict with Mobility Plan Policy 2.5.

Policy 2.6 Bicycle Networks – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

While this is a citywide policy, the Project would support its implementation. The existing bicycle system in the study area consists of a dedicated bike lane on Harbor Boulevard and 9th Street as a bicycle friendly street. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicycle parking requirements per LAMC Section 12.21-A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Policy 2.7 Vehicle Network – Provide vehicular access to the regional freeway system.

This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Regional access is provided by the Harbor Freeway (I-110) 2 miles northwest of the Site. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Policy 2.10 Loading Areas – Facilitate the provision of adequate on and off-street loading areas.

The Project would include a loading area to serve the retail use. The location may be on Palos Verdes or Beacon, which already supports on-street parking. As such, delivery trucks would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, vehicular access to the Project Site would be provided by a two-way ingress and egress driveway on Palos Verdes. Pedestrian access to the retail space of the Project would be provided via sidewalk on 6th. Pedestrian access to the residential building would be provided via a residential lobby located along Beacon. The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

Mobility Plan Programs PL.1 and PK.10

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be provided via a new driveway on Palos Verdes for commercial and residential parking. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. While this is a citywide program, the Project would not conflict with its implementation. The new driveway would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process.

to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

Transit Oriented Community Guidelines

The Transit Oriented Community (TOC) Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 1 TOC, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

Vision Zero

No street surrounding the Site has been identified in the High Injury Network.¹³² While no Vision Zero Safety Improvements are currently planned near the Project Site, Project improvements to the pedestrian environment would not preclude future improvements by the City. Therefore, the Project would not conflict with Vision Zero.

Citywide Design Guideline 2

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points on both 6th and Beacon, and a single driveway for vehicular access which would be located on Palos Verdes. The Project would also maintain continuity of the sidewalk by including only one curb cut on the Project Site. Therefore, the Project would not conflict with Citywide Design Guideline 2.

Conclusion

The Project is consistent with the City plans and policies listed in Table 2.1-1 of the TAG along with the described documents above; therefore, the Project would not result in a significant impact under Threshold T-1.

Waivers of Dedication

The requested waiver of dedication along Palos Verdes Street, 6th Street and Beacon Street is to allow wider sidewalks and pedestrian amenities consistent with recent Community Redevelopment Agency (CRA) Streetscape plans for adjacent streets.

Beacon Street

¹³² High Injury Network: <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>

The full right-of-way of Beacon Street is already improved to mobility standards. However, Beacon Street tends to favor sidewalk/pedestrian programming vs vehicular programming. The half-roadway varies between a 7.2 ft to 17 ft and full roadway varies between 14.4 ft to 34 ft, while the sidewalk varies between 13 ft to 22.8 ft. Mobility standards require a wider roadway and narrower sidewalk. However, it has been identified that this specific region of San Pedro (roughly 6-block area) has been part of many previous California Redevelopment Agency (CRA) efforts via the 1995, 2000, 2005 and 2010 CRA Streetscape Projects. Although the full right-of-way is already dedicated, conformity with the Mobility Plan would be in direct conflict with the revitalization efforts that favors the pedestrian experience along Beacon Street and would diminish the one-way nature of the street. Additionally, requiring the reprogramming of Beacon Street would bear unreasonable impacts to nearby and adjacent San Pedro City Hall, also known as Pepper Tree Plaza. The Mobility Standards would require the narrowing of the pedestrian-favored sidewalks, which has existing continuity and connection between Pepper Tree Plaza, which functions as a public park, and the public right-of-way.

6th Street

The full right-of-way of 6th Street is already improved to mobility standards. However, 6th Street tends to favor sidewalk programming vs vehicular programming. The half roadway varies between a 9.5 to 16 ft and full roadway between 19 to 32 ft while the sidewalk varies between 14 to 20.5 ft. Mobility standards require a wider roadway and shorter sidewalk. However, it has been identified that this specific region of San Pedro (roughly 6-block area) has been part of many previous California Redevelopment Agency (CRA) efforts via the 1995, 2000, 2005 and 2010 CRA Streetscape Projects. Although the full right-of-way is already dedicated, conformity with the Mobility Plan would be in direct conflict with the revitalization efforts which favors the pedestrian experience along 6th Street.

Palos Verdes Street

The full right-of-way of Palos Verdes Street is over-dedicated by 4 feet. Mobility standards require a 60 ft right-of-way and 36 ft roadway. The existing half roadway is 22 ft with a full roadway of 44 ft. The existing right-of-way is 64 ft wide with a half right-of-way of 32 ft. The site has an existing 10 ft sidewalk length which will need to be improved to at least 12 ft in width to comply with Mobility Standards. It has been identified that this section of Palos Verdes St (6-block project site radius) was recently improved as part of many previous California Redevelopment Agency (CRA) beautification efforts via the 1995, 2000, 2005 and 2010 CRA Streetscape Projects. Conformance with all Mobility standards would be a direct conflict with, the Mobility Plan and would further be a direct conflict with the revitalization efforts which favors along Palos Verdes Street.

Conclusion

While conformity with Mobility standards, street widening and dedication may be feasible in most cases, given the recent public beautification efforts made by the CRA through the 1995, 2000, 2005 and 2010 Streetscape Implementation Plans, consistency with the mobility practices would be undesirable and would bear an unreasonable relationship with many project impacts.

Due to the recurring CRA Streetscape efforts and recent public improvements, it is concluded that the dedication or improvement is not necessary to meet the City's Mobility needs for the next 20 years based on recent Streetscape efforts established. The widening or narrowing of any portion of the existing right-of-way conditions would result in the removal or relocation of recently installed landscape parkway areas, street furniture and decorative sidewalks and street lights would be impractical. As identified in the numerous Streetscape Plans, sidewalks and streets were modified to enhance the pedestrian experiences. Upgrades were made to street lights and open space was enhanced through the use of multiple street trees, which align and complement one another. Street furniture, such as benches, are found along 6th Street. Additionally, the use of aesthetically pleasing sidewalk patterns and parkway planters have been installed to enhance the pedestrian experience.

The requested Waiver of Dedication and/or Improvement along 6th Street, Beacon Street and Palos Verdes Street does not bear a reasonable relationship to any project impact as made evident by the 1995, 2000, 2005 and 2010 CRA Streetscape Plans and made further evident by the specific Project proposal. The widening of streets and narrowing of sidewalks would be in direct conflict with the recent efforts made within the immediate vicinity and therefore, the dedication or improvement is not necessary to meet the City's Mobility needs for next 20 years based on these recent Streetscape efforts. The dedication and/or improvement would also require the removal or relocation or recently upgraded and aesthetically pleasing street lights, sidewalks, sidewalks patterns and street furniture, this would yield an impracticality to existing conditions. Due to the reasons stated above, the widening or narrowing of either 6th Street, Beacon Street or Palos Verdes Street would create infeasibilities and/or impracticalities to the existing neighborhood and community conditions and does not bear a reasonable relationship to any project impact, is not necessary to meet the City's Mobility needs for the next 20 years, and creates impracticalities.

Therefore, the impact will be less than significant.

Causing Substantial Vehicle Miles Traveled

Threshold T-2.1 states that a residential project would result in a significant VMT impact if it would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the City's Area Planning Commission (APC) area in which a project is located. Similarly, a commercial project would result in a significant VMT impact if it would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC area in which the project is located.

The VMT analysis presented below was conducted in accordance with the TAG, and in compliance with State requirements under SB 743.

Along with the updated TAG, LADOT developed the VMT Calculator Version 1.2 (the VMT Calculator). The VMT Calculator estimates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator utilizes average daily trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) and empirical trip generation data to determine the

base daily trips associated with a land use project. The number of daily trips is further refined using data from the Environmental Protection Agency's Mixed-Use Model and the City's Travel Demand Forecasting Model.

The VMT Calculator was utilized to determine the net daily trip generation for the Project. The VMT Calculator contains a set of land-use categories with trip generation rates and corresponding trip type data that can be chosen as best matching a project's characteristics. For the Project and existing site land uses, the trip generation rates and trip type percentages for the most similar land uses were applied in the VMT Calculator.

The Housing (Multi-Family) and Retail (General Retail) land use rates were applied to the corresponding Project uses. The Retail (High-Turnover Sit-Down Restaurant), Office (General Office), and Office (Medical Office) land use rates were applied to the existing site uses. Based on the VMT Calculator, the Project would generate 247 net daily vehicle trips and 1,276 net daily VMT. As the Project would generate fewer than 250 net daily vehicle trips, the Project would not require the preparation of a TA or further VMT analysis, per the screening thresholds in the TAG.

Per the TAG, a TA is required when a project is likely to add 250 or more net daily vehicle trips to the local street system. Given that the Project is estimated to add 247 net daily vehicle trips to the local street system on a typical weekday, the Project is not expected to result in significant impacts to the surrounding transportation system. Therefore, neither a TA nor further analysis of transportation impacts is required for the Project.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). The Project would not result in a significant impact under Threshold T-2.1.

LADOT issued an approval letter (included as **Appendix I-2** to this Addendum), which confirms its concurrence with the conclusion of the analysis that the trip generation by the Project does not meet the trip threshold to require a transportation impact analysis. Therefore, LADOT will not require the preparation of a transportation assessment for this Project.

Substantially Inducing Additional Automobile Travel

The intent of Threshold T-2.2 is to assess whether a transportation project would induce substantial VMT, such as the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.

The Project does not propose a transportation project that would induce automobile travel and does not propose additional traffic lanes. No additional lanes are recommended for access as all provisions for vehicles can utilize the current pavement widths. Therefore, further evaluation will not be required, and the Project would not result in a significant impact under Threshold T-2.2.

Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

Further evaluation is required for projects that propose new access points or modifications along the public right-of-way (i.e., street dedications) under Threshold T-3.

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. The worksite traffic control plans will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians.

There are four existing curb cuts as follows: One driveway on Palos Verdes, one on 6th Street, one on Beacon, and one on 7th Street. These curb cuts will be removed. One new curb cut will be provided on Palos Verdes, north of the current location. Driveway location and design will be subject to LADOT review, which will ensure that City standards regarding sight lines and turning movements are in compliance. Therefore, no impact would occur.

Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The developer will install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety. Therefore, no impact would occur.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact would occur.

Emergency Access

This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and post-construction.

Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets.

Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required

4.16.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.16.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to transportation impacts. No substantial changes in the environment related to transportation have occurred since certification of the EIR, and no substantial new significant traffic sources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts related to transportation.

4.16.5 Mitigation Measures Addressing Impacts

The Certified EIR determined there are no feasible mitigation measures and impacts would be significant and unavoidable. Implementation of the Project would reduce these determinations to less than significant based on the project-specific analysis conducted under LADOT's Transportation Assessment Guidelines. Therefore, no additional mitigation measures are required.

4.16.6 Conclusion

Based on the above, no new significant transportation impacts or a substantial increase in previously identified transportation impacts would occur as a result of the Project. Therefore, the impacts to transportation as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.17 Tribal Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
TRIBAL CULTURAL RESOURCES: Would the project:					
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant	No	No	No	No
(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix K** to this Addendum:

K Native American Heritage Commission Response, May 7, 2020

4.17.1 Impact Determination in the Certified EIR

AB 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with

the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project.

The NOP for the San Pedro New Community Plan EIR was released on January 31, 2008, and therefore, the lead agency was not required to comply with the requirements of AB 52.

Nevertheless, the issues related to tribal cultural resources were addressed within the Cultural Resources section of the Certified EIR. As stated in the Certified EIR, there is one known formal cemetery within the CPA, Harbor View Memorial Park (formerly San Pedro Cemetery). No changes are proposed to this cemetery. The San Pedro CPA is highly disturbed and unmarked cemeteries or graves that may have existed at the surface have likely been disturbed by past development. The Certified EIR determined that the potential to disturb any human remains interred outside of formal cemeteries is considered low, given the level of past human activity. However, it is possible that unknown human remains could be located on sites developed under the Community Plan. Section 5097.98 outlines the NAHC notification process and the appropriate procedures if the County Coroner determines the human remains to be Native American. Compliance with applicable regulations would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant.

Mitigation Measures

Impacts related to tribal cultural resources were determined to be less than significant for the Community Plan, and therefore, no mitigation measures were required.

4.17.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site is developed with commercial and office uses and a surface parking lot. These buildings were constructed in 1978 and are not old enough to be considered as historic resources. According to ZIMAS, the Project Site does not require historic preservation review.¹³³ The Project Site has not been listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). No impact with respect to historical resources will occur.

The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.¹³⁴

¹³³ HistoricPlacesLA: <http://www.historicplacesla.org/map>, accessed March 23, 2020.

¹³⁴ Native American Heritage Commission Response, May 7, 2020

Further, the City has established a standard condition of approval (provided below) to address the inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting of construction activities near the encounter and the Project's certified construction monitor notifying the City and Native American tribes that have informed the City that they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Condition of Approval

Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-0092.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal

monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Mitigation Measures

None required.

4.17.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to tribal cultural resources. No substantial changes to tribal cultural resources have occurred since certification of the EIR, and no substantial new changes in tribal cultural resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.17.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified related to one or more significant effects related to tribal cultural resources not discussed in the Certified EIR, significant effects related to tribal cultural resources previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.17.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on tribal cultural resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.17.6 Conclusion

Based on the above, no new significant tribal cultural resources or a substantial increase in previously identified tribal cultural resources would occur as a result of the Project. Therefore, the impacts to tribal cultural resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.18 Utilities and Service Systems

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
UTILITIES AND SERVICE SYSTEMS:					
Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?	Less Than Significant with Mitigation	No	No	No	Yes
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Significant and Unavoidable	No	No	No	Yes
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No	No	No	No
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant with Mitigation	No	No	No	Yes
(e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix L** to this Addendum:

- L-1** Sewer Capacity Availability Request, Los Angeles Bureau of Sanitation, April 28, 2020
- L-2** Will Serve Letter, Los Angeles Department of Water and Power, January 23, 2020
- L-3** Will Serve Letter, Southern California Gas Company, December 19, 2019
- L-4** Will Serve Letter, Cox Communications, January 13, 2020

L-5 Will Serve Letter, AT&T, undated

4.18.1 Impact Determination in the Certified EIR

Water

Water demand in the CPA is currently about 11.27 mgd and is projected to increase by 2.01 mgd with full reasonably expected capacity of the proposed plan. The LADWP has indicated that the CPA contains water mains of various sizes and capacities and could not provide information for every water main within the CPA. The LADWP has indicated that they would provide information on a project-by-project basis. Water supply boundaries are not divided by CPA or other political units, but are bounded based on pressure zones dictated by ground elevation.

Water provided to the CPA that requires treatment at the LAAFP is currently 11.26 mgd. Projected water demand for the CPA in 2030 would be 13.25 mgd. For informational purposes, the 2010 UWMP projects that Citywide water demand would be approximately 641,622 acre-feet in 2035 with active and passive water conservation measures implemented. This increase in demand is due to the projected increase in population from 2005 to 2030 associated with the increase in dwelling units. The estimated water demand would increase by 1.98 mgd, which would increase the current usage of the water treatment facilities that currently serve the CPA. However, with 125 mgd of remaining treatment capability, LAAFP has ample capacity to provide the CPA with its projected water needs.

Existing General Plan Framework (GPF) Element Policies 9.8.1, 9.9.1 through 9.9.9, 9.10.1, 9.10.2, and 9.11.1 address water supply issues by monitoring current demand, projecting future demand, and conservation techniques to maintain an adequate quality supply needed for consumers as well as for fire flow requirements. These policies would apply to existing and proposed developments in the CPA. In addition, all applicable standard mitigation measures would apply to future development in the. Further, Policies CF8.1, CF8.2, and CF8.3 of the proposed plan, included in Table 4.14-3, are intended to implement water conservation measures to meet and accommodate increased water demand created by new development permitted under the proposed plan. Based on the availability of sufficient capacity at LAAFP to handle the projected increase in water needs and included policies and mitigation measures, implementation of the proposed plan would have a less-than-significant impact on water treatment facilities, and no further mitigation is required.

Ongoing conservation efforts, implementation of mitigation measure MM4.14-1, and GPF and proposed plan policies designed to reduce water usage would help reduce potential impacts to water supplies. While the increased demand for water as a result of implementation of the proposed San Pedro Community Plan is negligible compared to citywide water demand, the proposed Plan and implementing ordinances could have a potential impact on existing entitlements and water resources. The program level environmental clearance for the proposed Community Plan does not eliminate future environmental review for any discretionary specific

project-level development. Future development requiring discretionary action will be evaluated under project-level environmental clearance. With proposed mitigation and compliance with existing regulations, impacts would be reduced, but not necessarily to less than significant. Therefore this impact would be considered significant and unavoidable.

Wastewater

Existing GPF Element Policies 9.1.1 through 9.1.3, 9.2.1 through 9.2.5, 9.3.1, 9.3.2, 9.4.1, and 9.4.2 address wastewater issues by monitoring generation and flow quantities, treating wastewater to the standards set by law and regulatory agencies, and expanding the system's capacity to accommodate growth and development. These policies would apply to existing and future discretionary development in the CPA.

Further, future development in the CPA would be required to comply with Policies CF9.1, CF9.2, and CF9.3 of the proposed plan, which promote wastewater reduction through implementation of water conservation measures. It is anticipated that water conservation will lead to reductions in the amount of wastewater generated. Due to aging infrastructure, replacement of sewer lines in the area can reasonably be expected with or without the proposed plan. Therefore, the proposed plan and implementing ordinances would not cause a measureable increase in wastewater flows that would exceed infrastructure capacity or require the construction of new wastewater treatment facilities or expansion of existing facilities other than localized improvements, which would not be expected to have significant environmental impacts. Impacts are less than significant.

Implementation of the proposed plan would not exceed the capacity of the wastewater treatment system. The Terminal Island Treatment Plant currently has a remaining capacity of 13.5 mgd and there are no current plans to expand the facility because of insufficient capacity. Therefore, the wastewater treatment provider has adequate capacity to serve the future demand created by implementation of the proposed plan, in addition to the provider's existing commitments, and impacts are less than significant.

Solid Waste

Existing GPF Element Policies 9.12.1 through 9.12.3 address solid waste issues by monitoring generation and implementing source reduction and diversion programs. These policies would apply to existing and proposed discretionary developments in the CPA. In addition, all future development requiring discretionary approval in the CPA would be subject to mitigation measure MM4.14-2 that are required as conditions of approval for any discretionary project as well as project-specific mitigation. Further, future discretionary development would be subject to Policies CF10.1 and CF10.2, of the proposed plan, which promotes recycling and waste reduction. Development pursuant to the proposed plan, would comply with all the diversion and recycling regulations of the state, County, and City and, therefore, would assist in the overall goal of reducing the amount of waste sent to landfills. Therefore, existing and proposed City policies and requirements would reduce these impacts to less than significant.

The proposed plan and implementing ordinances could result in development and redevelopment of land uses that would generate solid waste. All solid waste-generating activities within the City of Los Angeles are subject to the requirements set forth in AB 939 and other local ordinances. Implementation of the proposed plan would be consistent with all waste reduction goals set forth by the Source Reduction and Recycling Element, City of Los Angeles Solid Waste Management Policy Plan, RENEW LA, and GPF, which are discussed above. All projects in the City undergo development review, which includes an analysis of project compliance with these programs. Therefore, future development permitted under the proposed plan would comply with all solid waste policies and objectives; impacts are less than significant, and no additional mitigation measures are required.

Statement of Overriding Considerations

The Certified EIR adopted a Statement of Overriding Considerations for the significant and unavoidable impacts, as discussed under Section 1.2, above.

Mitigation Measures

The following mitigation measures were included in the Certified EIR to reduce impacts related to utilities:

- MM4.14-1** The CPIO District shall include regulations that incorporate water conservation measures into the project design, which may include but are not limited to measures identified in the City's Water Conservation Ordinance.
- MM4.14-2** The CPIO District shall include regulations that require that projects incorporate the Solid Waste Integrated Resources Plan measures to maximize source reduction and materials recovery and minimize the amount of solid waste requiring disposal with the goal of leading the City to achieve zero waste by 2025.

Environmental Standards

The following environmental standards were included in CPIO to reduce impacts related to utilities:

- US1** Projects shall incorporate water conservation measures into the project design, which may include but are not limited to measures identified in the City's Water Conservation Ordinance.
- US2** Projects shall incorporate the Solid Waste Integrated Resources Plan measures to maximize source reduction and materials recovery and minimize the amount of solid waste requiring disposal with the goal of leading the City to achieve zero waste by 2025.

4.18.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the Project's impacts with respect to utilities were accounted for within the analysis contained in the Certified EIR.

Water Facilities

As shown on **Table 4.18-1, Project Estimated Water Demand**, it is estimated the Project will demand a total of approximately 48,454 gpd (or 0.048 mgd) of water. This is conservative and does not take credit for the removal of existing uses. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 4.18-1
Project Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Residential – Studio	83 units	75 gallons / unit	6,225
Residential – 1 Bedroom	101 units	110 gallons / unit	11,110
Residential – 2 Bedroom	84 units	150 gallons / unit	12,600
Residential – 3 Bedroom	13 units	190 gallons / unit	2,470
Retail	2,316 sf	25 gallons / 1,000 sf	58
Lounge amenities	3,122 sf	50 gallons / 1,000 sf	156
Office (Leasing and mailbox)	2,778 sf	120 gallons / 1,000 sf	333
Health Club amenity	4,309 sf	650 gallons / 1,000 sf	2,801
Swimming Pool	-	-	12,701
Total Increase			48,454
Note: sf = square feet; cf = cubic feet; gpd = gallons per day Wastewater generation is assumed to equal water consumption. City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Sewer Capacity Availability Request, Los Angeles Bureau of Sanitation, April 28, 2020 Table: CAJA Environmental Services, June 2020.			

The Water Service Organization (WSO) would be able to provide the domestic needs of the Project from the existing water system. The Project Applicant will consult with the LADBS and LAFD to determine fire flow requirements for the Project. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

The Project's water consumption increase of 0.048 mgd would be served within the remaining capacity currently available at LAAFP of approximately 125 mgd. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the water conveyance system would be less than significant.

While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements. Section 57.507.3.1 of the LAMC establishes fire flow standards for specified land uses, including Low Density Residential, High Density Residential and Commercial Neighborhood, Industrial and Commercial, and High Density Industrial and Commercial or Industrial. Based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City. Additionally, as required by the LAMC, hydrants would be spaced per the hydrant spacing requirements set forth in Section 57.507.3.2 of the LAMC to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities.

Water Supply

The 2015 Urban Water Management Plan (UWMP) was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.¹³⁵ The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP (the 2016 RTP was completed after the 2015 UWMP).¹³⁶ The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).¹³⁷ Neither the Urban Water Management Plan forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand.¹³⁸

Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180822 and in the Los Angeles Green Building Code (LAGBC) to minimize water usage. Further, prior to issuance of a building permit,

¹³⁵ 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

¹³⁶ 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

¹³⁷ SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

¹³⁸ 2015 Urban Water Management Plan, Los Angeles.

the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no impact would occur.

Wastewater Facilities

As shown on **Table 4.18-2, Project Estimated Wastewater Generation**, it is estimated the Project will generate a total of approximately 48,454 gallons per day (gpd) (or 0.048 mgd) of wastewater. This is conservative and does not take credit for the removal of existing uses. This total does not take any credit for the proposed sustainable and water conservation features of the Project. The Bureau of Sanitation approved a Sewer Capacity Availability Request (SCAR) of 48,454 gallons of discharge on April 28, 2020.

**Table 4.18-2
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential – Studio	83 units	75 gallons / unit	6,225
Residential – 1 Bedroom	101 units	110 gallons / unit	11,110
Residential – 2 Bedroom	84 units	150 gallons / unit	12,600
Residential – 3 Bedroom	13 units	190 gallons / unit	2,470
Retail	2,316 sf	25 gallons / 1,000 sf	58
Lounge amenities	3,122 sf	50 gallons / 1,000 sf	156
Office (Leasing and mailbox)	2,778 sf	120 gallons / 1,000 sf	333
Health Club amenity	4,309 sf	650 gallons / 1,000 sf	2,801
Swimming Pool	-	-	12,701
Total Increase			48,454
Note: sf = square feet; cf = cubic feet; gpd = gallons per day City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Sewer Capacity Availability Request, Los Angeles Bureau of Sanitation, April 28, 2020 Table: CAJA Environmental Services, June 2020.			

The Project's wastewater generation increase of 0.048 mgd would be served within the remaining capacity currently available at Terminal Island Treatment Plant (13.5 mgd). Therefore, impacts to wastewater treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the wastewater conveyance system would be less than significant.

As Terminal Island Treatment Plant complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts would be less than significant.

The Project Site will be served by LA Sanitation, which provides municipal wastewater services to the City. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the Terminal Island Treatment Plant and would not have a significant impact on treatment plant capacity.

Solid Waste

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

See **Table 4.18-3**, for the Project Demolition and Construction Waste Generation. Demolition will remove approximately 30,022 square feet of the existing buildings. Demolition would produce demolition waste and recycling opportunities of raw materials. Construction of the approximately 338,046 square feet of new floor area would generate approximately 739.5 tons of construction waste. The total after 75% recycling rate is 1,367 tons.

Table 4.18-3
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Demolition Waste			
Residential	0	155 pounds / sf	0
Non-residential	30,022 sf	173 pounds / sf	2,597
Asphalt	56,341 sf	75 pounds / sf	2,113

**Table 4.18-3
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Construction Waste			
Residential	335,730 sf	4.38 pounds / sf	735
Non-residential	2,316 sf	3.89 pounds / sf	4.5
Total			5,449.5
Total after 75% recycling			1,367
<p>Over the entire total schedule of construction. sf = square feet, 1 ton = 2,000 lbs Based on 173 pounds of nonresidential demolition per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-3 and Table A-4, pages A-2 to A-3: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998. Applied generation rates are averages of empirical waste assessments of residential demolition, non-residential demolition, residential construction, and nonresidential construction waste streams in the United States. Using conservative amount. Based on 3.89 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf 1 cubic foot of asphalt weights 150 pounds. The asphalt at the site is assumed to be 6 inches thick. Table: CAJA Environmental Services, October 2020.</p>			

This amount of construction and debris waste would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.72 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts would be less than significant.

As shown on **Table 4.18-4, Project Estimated Solid Waste Generation**, it is estimated the Project will generate a total of approximately 648 tons per year of solid waste.

**Table 4.18-4
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (tons)
Residential	281 units	2.23 tons / unit	627
Commercial	7 employees	2.98 tons / employee	21

**Table 4.18-4
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (tons)
Total Increase			648
Note: 1 ton = 2,000 pounds. Residential solid waste factor (City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2) is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year). Non-residential solid waste factor (City of Los Angeles Bureau of Sanitation, Waste Characterization and Quantification Study, Table 4, July 2002) is based on tons per employee per year: Table: CAJA Environmental Services, March 2020.			

In compliance with the LAMC, the Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

The increase in solid waste disposal would represent an approximate 0.02 percent increase in the City's annual solid waste disposal quantity, based on the 2018 disposal of approximately 3.3 million tons.

The increase in solid waste disposal would represent approximately 0.0004 percent of the estimated remaining Class III landfill capacity of 147.25 million tons available to the City of Los Angeles. Therefore, no Project impacts related to solid waste would occur and the Project is adequately served. Therefore, operation impacts would be less than significant.

Stormwater Drainage

As discussed in **Section 4.10**, above, the Project would increase the percentage of pervious surfaces within the Project Site due to an increase in open space and landscaping areas. The Project Site is located in an urbanized area of the City. The Project Site is currently primarily covered with a building and parking lot (hardscape). The Project will similarly occupy the entire Project Site with a new building, as well as paving and landscaping. The Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff.

Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project and the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with federal, state, and local regulations. Therefore, impacts would be less than significant.

Electric Power

As discussed in **Section 4.6**, above, LADWP has confirmed that electrical service is available and will be provided in accordance with the LADWP's Water and Power Rules and Regulations.¹³⁹ Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Natural Gas

As discussed in **Section 4.6**, above, there is sufficient natural gas supplies to serve the Project's natural gas demand. SCG has confirmed that there are facilities to serve the Project in accordance with policies and extension rules from the California Public Utilities Commission.¹⁴⁰

¹³⁹ Will Serve Letter, Los Angeles Department of Water and Power, January 23, 2020.

¹⁴⁰ Will Serve Letter, Southern California Gas Company, December 19, 2019.

Accordingly, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded natural gas facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Telecommunications

The Project would be served by AT&T¹⁴¹ and Cox.¹⁴² The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. All on-site work would be within overall Project construction, which has been analyzed. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Impacts would be less than significant.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to utilities, the Project would nevertheless implement Mitigation Measures MM4.14-1 and MM4.14-2 from the Certified EIR.

Compliance with the City's Green Building Program would ensure that the proposed development incorporates water conservation measures into the project design. Compliance with AB 939 would ensure that the proposed development reuse or recycle building materials to the extent feasible.

Environmental Standards

The Project would implement Environmental Standards US1 and US2 from the CPIO.

US1 and US2 are the same as MM4.14-1 and MM4.14-2.

Compliance with the City's Green Building Program would ensure that the proposed development incorporates water conservation measures into the project design. Compliance

¹⁴¹ Will Serve Letter, AT&T, undated.

¹⁴² Will Serve Letter, Cox Communications, January 13, 2020.

with AB 939 would ensure that the proposed development reuse or recycle building materials to the extent feasible.

4.18.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.18.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance that has become available relative to utilities impacts. No substantial changes in the environment related to recreation have occurred since certification of the EIR, and no substantial new significant resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts related to utilities.

4.18.5 Mitigation Measures Addressing Impacts

As stated above, the Project would implement Mitigation Measures MM4.14-1 and MM4.14-2 from the Certified EIR.

The Project would comply with Environmental Standards US1 and US2 from the CPIO.

4.18.6 Conclusion

Based on the above, no new significant utility and service system impacts or a substantial increase in previously identified utility impacts would occur as a result of the Project. Therefore, the impacts to utilities and service systems as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.19 Wildfire

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis?	EIR's Mitigation Measures Addressing Impact
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less Than Significant	No	No	No	No
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less Than Significant	No	No	No	No
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage change?	Less Than Significant	No	No	No	No

4.19.1 Impact Determination in the Certified EIR

Regarding emergency response plans, the Certified EIR determined that implementation of the new Community Plan would not impair implementation of, or physically interfere with, the Los Angeles County Operational Area Emergency Response Plan, as no new streets would be introduced, nor would the overall land use patterns of the CPA be changed. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to emergency response plans.

The Certified EIR stated that lands designated Very High Fire Hazard Severity Zone are located in the hilly southern and western portions of the CPA. New construction in these zones must comply with a variety of requirements from the LAMC (Chapter V, Article 7, *Fire Code*), including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. Implementation of existing regulations would help minimize wildland fire

hazards. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to wildland fire.

4.19.2 Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site is not located in a Very High Fire Hazard Severity Zone¹⁴³ or in the wildlands fire hazard Mountain Fire District.¹⁴⁴ The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

4.19.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to wildfire. No substantial changes to wildfire have occurred since certification of the EIR, and no substantial new changes in wildfire have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

4.19.4 Any New Information Requiring New Analysis?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified EIR was certified related to one or more significant effects related to wildfire not discussed in the Certified EIR, significant effects related to wildfire previously examined that will be substantially more severe than shown in the Certified EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.19.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Approved Project would have a less than significant impact on wildfire, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

¹⁴³ ZIMAS search: <http://zimas.lacity.org/>.

¹⁴⁴ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, March 26, 2020.

4.19.6 Conclusion

Based on the above, no new significant wildfire impacts or a substantial increase in previously identified wildfire impacts would occur as a result of the Project. Therefore, the impacts to wildfire as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.