IV. SCEA ENVIRONMENTAL ANALYSIS

A. Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided	

or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment as identified in the Initial Study contained herein, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) contains measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.	**X**

Impact Sciences, Inc.	March 2022	David Woon
Prepared By	Date	Reviewed By
David Woon	3/29/2022	David Woon
Printed Name	Date	Printed Name

Sustainable Communities Environmental Assessment adopted on: _____
Date

Adoption attested to by: _____ 3/21/2022
Signature Date

Heather Bleemers
Printed name

B. Evaluation of Environmental Impacts:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact' is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," may be cross-referenced).

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significant.

C. Environmental Checklist Form

Background

Date checklist submitted: 3/21/2022

Department requiring checklist: Department of City Planning

Case Manager: _____, Senior Planner

D. Environmental Impacts (explanations of all answers are required):

1. Aesthetics

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

Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, § 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.

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

(4) "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

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

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

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

The proposed project is an infill mixed-use development project that will include 242 multi-family residential units. Several major bus lines serve the Project Site, providing connections to the Wilshire/Western Metro Station approximately 1.80 miles away.[1] The Wilshire/Western Metro Station is serviced by the Metro D (formerly Purple) Line subway. The D Line is a centrally located subway line that begins/ends at the Wilshire/Western Station and travels east/west through Koreatown and terminates/begins at L.A. Union Station.[2] Furthermore, the site is within a Transit Priority Area within the City of Los Angeles.[3] For these reasons, the proposed project qualifies for the SB 743 exemption and the Project's aesthetic and parking impacts shall not be considered a significant impact. The analysis below is provided for **informational purposes only.**

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

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, tress, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, 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?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

1 The major bus lines include the 720 and 20 servicing east/west service along Wilshire Boulevard. Bus & Rail System Overview – Maps & Timetables. Available online at: http://media.metro.net/riding_metro/maps/images/4_17-3071_BLT_BusRailOverview.pdf, July 2017.

2 Metro and Regional Rail Map. Available online at: https://media.metro.net/documents/90e3378c-e786-4cc7-8f4b-88fc15a4b3b3.pdf/, accessed March 1, 2021.

3 ZIMAS. LA City. Available online at: http://zimas.lacity.org/, accessed March 1, 2021.

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

This discussion is for informational purposes only. The proposed project is located in a highly urbanized area in the City of Los Angeles. The project site is surrounded by a mix of commercial, retail, institutional, and residential uses.

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private property. The City of Los Angeles CEQA Thresholds do not protect views available from private vantage points such as private offices or private homes.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Wilshire Boulevard provides the major east-west view corridor. As such, views from the street level near the Project Site would not be substantially affected as the building would be comparable in height to the existing buildings both to the west and east (across Highland Avenue) of the Project Site.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, pursuant to CEQA § 21099(d), the project would have less than significant impacts to scenic vistas.

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

This discussion is for informational purposes only. No officially designated or eligible State-designated scenic highways are located adjacent to, or within view of, the Project Site.[4] Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) within the City of Los Angeles is a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic parkway). A portion of Pacific Coast Highway

[4] California Department of Transportation. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 19, 2021.

(PCH), (beginning in the City of Santa Monica and heading towards the City of Malibu), is eligible to be designated as a State Scenic Highway.[5]

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

c. In non-urbanized areas, 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 a 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?

This discussion is for informational purposes only. As the project is located in an urbanized area, this analysis focus on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The site is zoned C4-2D and [Q]C2-1/[Q]C2-1-HPOZ, which allows specific commercial uses.[6] However, the [Q]C2-1 and [Q]C2-1-HPOZ zones are subject to "Q" Condition associated with Subarea 944 of Ordinance No. 174,483 of the Wilshire Community Plan Update, which came into effect on May 5, 2002. While Subarea 944 is located within a commercial zone and land use designation, the "Q" Condition limits development to parking lots or residential development. The "D" limitation is pursuant to Ordinance No. 165,331 Subarea No. 2085, which limits development on the C4 portion of the Project Site to a FAR of 3 to 1. The lot area is approximately 73,397 square feet and the proposed project would include approximately 282,050 square feet of floor area. Therefore, the Project would have an FAR of 3.84 to 1 and would not exceed the FAR restrictions. The buildings to the east and west are approximately nine to ten stories in height. The proposed height and scale of the proposed buildings would be consistent with the surrounding commercial and office buildings to the east and west. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

5 California Department of Transportation. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 19, 2021.

6 Section 12.16 "C2" and "C4" Commercial Zone, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3559.

Other visual and aesthetic considerations

While no scenic highways in the project area are designated by the State as analyzed for Impact 1(b) above; the Wilshire Community Plan designates Highland Avenue from Rosewood to Wilshire Boulevard as a Designated Scenic Highway.[7] The Wilshire Community Plan notes that land contiguous to a scenic highway is known as a Scenic Corridor and that protective land use controls be established for these Corridors, particularly with respect to signage and billboards.[8]

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, consistent with Los Angeles Municipal Code (LAMC) Section 91.6205, which regulates 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.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed buildings, 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.

Furthermore, pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, impacts would be less than significant.

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

This discussion is for informational purposes only. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation

7 City of Los Angeles. 2001. Wilshire Community Plan. Available at: https://planning.lacity.org/odocument/3333424a-21b9-4f7b-86db-064926b9dcb9/Wilshire_Community_Plan.pdf

8 Ibid.

of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

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

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within TPAs, aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). As such, aesthetic impacts would be less than significant.

2. Agriculture and Forestry Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Farmland Mapping and Monitoring Program indicates that the Project Site is Urban and Built-Up Land, which is land that contains man-made structures or buildings under construction, and the infrastructure required for development (i.e. paved roads, sewers, water, electricity, drainage, or flood control facilities) that are specifically designed to serve that land.[9] The site is zoned C4-2D and [Q]C2-1/[Q]C2-1-HPOZ, is located within an urbanized area of the City of Los Angeles, and is currently developed which would classify the site as Urban and Built-Up Land. Therefore, implementation of the proposed project would not convert farmland to non-agricultural use. As such, no impacts would occur.

9 California Department of Conservation. California Important Farmland Finder. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/

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

No Impact. The Project Site is within the City of Los Angeles Wilshire Community Plan Area and is zoned C4-2D and [Q]C2-1/[Q]C2-1-HPOZ. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the proposed project would not conflict with existing agricultural zoning or a Williamson Act Contract. As such, no impacts on agricultural resources would occur.

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

No Impact. The Project Site is zoned is zoned C4-2D and [Q]C2-1/[Q]C2-1-HPOZ. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the proposed project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further analysis is required.

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

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

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[10] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[11] The Project Site is not zoned for forest land or timberland and there is no forest land or timberland on-site or in the project vicinity and project development would not cause a loss of forest land or timberland.[12] As such, no impacts would occur.

10 California PRC § 12220[g]

11 California PRC § 4526

12 City of Los Angeles. Zimas. Available at: http://zimas.lacity.org/

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

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

3. Air Quality

The analysis provided below is primarily based on technical data prepared in the Air Quality and Greenhouse Gas Technical Study (refer to **Appendix B**).

Introduction

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. The City of Los Angeles is located within the South Coast Air Basin (SCAB), which incorporates approximately 12,000 square miles consisting of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the Basin. Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the South Coast Air Quality Management District (SCAQMD). Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model version 2016.3.2 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

Air Pollution Climatology

The SCAB is in an area of high pollution potential due to the climate and topography of the region. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average with speeds. [13] The area is considered semi-arid and is characterized by warm summers, mild winters infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The annual average

[13] South Coast Air Quality Management District. 2017. *2016 Air Quality Management Plan*. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

temperature varies little throughout the SCAB region, ranging from the low 60s to the high 80s, measures in degrees Fahrenheit (F°).

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two similarly distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions is a critical determinant leading to highly degraded air quality in the summer and generally good air quality in the winter in Los Angeles.

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. [14] The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NO_x) are not classified as criteria pollutants. However, ROGs and NOx are widely emitted from land development projects and participate in photochemical reactions in the atmosphere to form O_3; therefore, NOx and ROGs are relevant to the proposed project and are of concern in the air basin and are listed below along with the criteria pollutants. Sources and

[14] California Air Resources Board. *Air Quality Standards*. Available online at: https://ww2.arb.ca.gov/resources/background-air-quality-standards.

health effects commonly associated with criteria pollutants are summarized in **Table IV.3-1, Criteria Pollutants Summary of Common Sources and Effects**.

Table IV.3-1
Criteria Pollutants Summary of Common Sources and Effects

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuels is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include moto vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between volatile organic compounds (VOC) and nitrous oxides (NOx) in the presence of sunlight. VOCs are also commonly referred to as reactive organic gases (ROGs). Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM10 & PM2.5)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned; when gasoline is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant; aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.

Source: CAPCOA, Health Effects. Available: http://www.capcoa.org/health-effects/

Air Monitoring Data

Ambient air quality in Los Angeles can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. Existing levels of ambient air quality and

historical trends and projections in the vicinity of Los Angeles are documented by measurements made by the South Coast Air Quality Management District (SCAQMD), the air pollution regulatory agency in the SCAB regions maintains air quality monitoring stations which process ambient air quality measurements.

The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM10 and PM2.5) are pollutants of particular concern in the SCAB. The monitoring station located closest to the proposed project Site and most representative of air quality near the proposed project Site is the Los Angeles – North Main Street station, located at 1630 North Main Street approximately 6.44 miles east of the proposed project Site. Ambient emission concentrations vary due to localized variations in emissions sources and climate and should be considered "generally" representative of ambient concentrations near the proposed project Site. The Los Angeles – North Main Street station monitors O_3, PM2.5, PM10, and NO_2, see **Table IV.3-2, Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations**.

Table IV.3-2
Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations

Pollutant	Standards[1]	Year		
		2017	2018	2019
OZONE (O_3)				
Maximum 1-hour concentration monitored (ppm)		0.116	0.098	0.085
Maximum 8-hour concentration monitored (ppm)		0.086	0.073	0.080
Number of days exceeding state 1-hour standard	0.09 ppm	6	2	0
Number of days exceeding federal/state 8-hour standard	0.070 ppm	14	4	2
NITROGEN DIOXIDE (NO_2)				
Maximum 1-hour concentration monitored (ppm)		0.081	0.070	0.069
Annual average concentration monitored (ppm)		0.021	0.018	0.018
Number of days exceeding state 1-hour standard	0.18 ppm	0	0	0
RESPIRABLE PARTICULATE MATTER (PM_{10})				
Maximum 24-hour concentration monitored (µg/m^3)		64.6	68.2	62.0
Annual average concentration monitored (µg/m^3)		25.7	30.2	25.5
Number of samples exceeding state standard	50 µg/m^3	40	31	3
Number of samples exceeding federal standard	150 µg/m^3	0	0	0
FINE PARTICULATE MATTER ($PM_{2.5}$)				
Maximum 24-hour concentration monitored (µg/m^3)		54.9	61.4	43.5
Annual average concentration monitored (µg/m^3)		12.0	12.8	10.8
Number of samples exceeding federal standard	35 µg/m^3	6	6	1

Source: California Air Resources Board, "Air Quality Data Statistics," http://www.arb.ca.gov/adam/. 2020.

Pollutant	Standards[1]	Year 2017	2018	2019

South Coast Air Quality Management District. 2019. Air Quality South Coast Air Quality Management District. Available online at: http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2019-air-quality-data-tables.pdf?sfvrsn=8. 2020.
NA = not available
[1] Parts by volume per million of air (ppm), micrograms per cubic meter of air (µg/m^3), or annual arithmetic mean (aam).
[2] The 8-hour federal O_3 standard was revised from 0.075 ppm to 0.070 ppm in 2015. The statistics shown are based on the 2015 standard of 0.070 ppm.

The attainment status for the SCAB region is included in **Table IV-3, Attainment Status of Criteria Pollutants in the South Coast Air Basin**. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SCAB region is designated as a nonattainment area for federal ozone, PM2.5, and lead standards and are designated as nonattainment for state ozone, PM10, and PM2.5 standards.

Table IV.3-3
Attainment Status of the South Coast Air Basin

Pollutant	State	Federal
Ozone (O_3)	Non-Attainment	Non-Attainment
Particulate Matter (PM10)	Non-Attainment	Attainment
Particulate Matter (PM2.5)	Non-Attainment	Non-Attainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Non-Attainment (Partial)[1]

Source: South Coast Air Quality Management District. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. naaqs-caaqs-feb2016.pdf, accessed March 2021.
[1] The Los Angeles County portion of the Basin is designated as a non-attainment area for the federal lead standard on the basis of source-specific monitoring at two locations as determined by U.S. EPA using 2007-2009 data. However, all stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2015 period. The SCAQMD will request that the U.S. EPA re-designated the Los Angeles County portion of the Basin as attainment for lead.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases.[15]

15 California Air Resources Board. *Sensitive Receptor Assessment*. Available online at: https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment.

Residential areas are considered sensitive receptors to air pollutions because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to health effects of air pollution due to their immature immune systems and developing organs.[16] As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

The following sensitive receptors are located near the proposed project site:

- Single Family residences approximately 20 feet north along South Highland Avenue.
- Single Family residences approximately 210 feet south along South Citrus Avenue.
- Multi Family residences approximately 280 feet east along Wilshire Boulevard

Regulatory Setting

Federal

Clean Air Act

The Clean Air Act (CAA) of 1970 and the CAA Amendments of 1971 required the U.S. Environmental Protection Agency (EPA) to establish NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. On April 2, 2007, the Supreme Court found that carbon dioxide is an air pollutant covered by the CAA; however, no NAAQS have been established for carbon dioxide. [17]

These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations

16 Office of Environmental Health Hazard Assessment and The American Lung Association of California. *Air Pollution and Children's Health*. Available online at: https://oehha.ca.gov/media/downloads/faqs/kidsair4-02.pdf.

17 Massachusetts, et al. v. Environmental Protection Agency, et al. No. 05-112. https://www.supremecourt.gov/opinions/06pdf/05-1120.pdf

considerably above these minimum standards before adverse effects are observed as compared to sensitive receptors due to differences in breathing rates and overall health.

The EPA has classified air basins (or portions thereof) as being in attainment, nonattainment, or unclassified for each criteria air pollutant, based on whether or not the NAAQS have been achieved. [18] If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designations. **Table IV.3-3** lists the federal attainment status of the SCAB for the criteria pollutants.

National Emissions Standards for Hazardous Air Pollutants Program

Under the CAA, the EPA is required to regulate emissions of hazardous air pollutants.[19] 187 substances are currently listed as hazardous air pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) program. The EPA has established regulatory schemes for specific source categories and requires implementation of the Maximum Achievable Control Technologies (MACT) for major sources of HAPs in each source category.[20] State law (Assembly Bill 1807 [1983]) has established the framework for California's toxic air contaminants (TAC) identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are a problem is California.[21] The State has formally identified 244 substances as TACs and is adopting appropriate control measures for each.[22] Once adopted at the State level, each air district will be required to adopt a measure that is equally or more stringent.

National Ambient Air Quality Standards

The Federal CAA required the EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants (see **Table IV.3-4**)**.** Primary standards define limits for the intention of protecting public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary Standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and

18 U.S. Environmental Protection Agency. 2021. *NAAQS Designation Process*. Available online at: https://www.epa.gov/criteria-air-pollutants/naaqs-designations-process.

19 U.S. Environmental Protection Agency. *Initial List of Hazardous Air Pollutants with Modifications*. Available online at: https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications.

20 U.S. Environmental Protection Agency. *Reducing Emissions of Hazardous Air Pollutants*. Available online at: https://www.epa.gov/haps/reducing-emissions-hazardous-air-pollutants.

21 California Air Resources Board. *AB 1807 – Toxics Air Contaminant Identification and Control*. Available online at: https://ww2.arb.ca.gov/resources/documents/ab-1807-toxics-air-contaminant-identification-and-control.

22 California Air Resources Board. *CARB Identified Toxic Air Contaminants*. Available online at: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

buildings. A summary of the federal ambient air quality standards is shown in **Table IV.3-4, National Ambient Air Quality Standards**.

Table IV.3-4
National Ambient Air Quality Standards

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon Monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 µg/m^3
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	0.053 ppm
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate Matter	PM2.5	Primary	Annual	12 µg/m^3
		Secondary	Annual	15 µg/m^3
		Primary and secondary	24 hours	35 µg/m^3
	PM10	Primary and secondary	24 hours	150 µg/m^3
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

State

California Clean Air Act of 1988

The California CAA of 1988 (CCAA) allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all air quality management districts (AQMDs) in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's State

Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.[23]

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards. California has also set standards for some pollutants that are not addressed by federal standards. The state standards for ambient air quality are summarized in **Table IV.3-5, California Ambient Air Quality Standards**.

Table IV.3-5
California Ambient Air Quality Standards

Pollutant		Averaging Time	Level
Carbon monoxide		8 hours	9 ppm
		1 hour	20 ppm
Lead		30-day average	1.5 µg/m^3
Nitrogen dioxide		1 hour	0.180 ppm
		Annual	0.030 ppm
Ozone		8 hours	0.070 ppm
		1 hour	0.09 ppm
Particulate matter	PM2.5	Annual	12 µg/m^3
	PM10	24 hours	50 µg/m^3
		Annual	20 µg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 µg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

California State Implementation Plan

The federal CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP).[24] The SIP is a living document that

[23] California Air Resources Board. *The California Air Resources Board*. Available online at: https://ww2.arb.ca.gov/about.

[24] California Air Resources Board. *California State Implementation Plans*. Available online at: https://ww2.arb.ca.gov/our-work/programs/california-state-implementation-plans.

is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The CAA Amendments dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the EPA for approval and publication in the Federal Register. The 2016 Air Quality Management Plan (2016 AQMP) is the SIP for SCAB. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SCAB and those portions of the Salton Sea Air Basin (SSAB) that are under the SCAQMD's jurisdictions. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnerships with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The most effective way to reduce air pollution impacts is to reduce emissions from mobile sources. The AQMP relies on regional and multi-level partnerships of governmental agencies at the federal, state, regional, and local level. Those agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. The 2016 AQMP includes integrated strategies and measures to meet the NAAQS.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal 2020-2045 RTP/SCS (Connect SoCal). However, the forecasts and measures in the plan have not been incorporated into any applicable air quality plan for the region.[25]

25 Southern California Association of Governments. *Adopted Final Connect SoCal* (2020-2045 RTP/SCS). Available online at: https://scag.ca.gov/read-plan-adopted-final-plan.

Regional

South Coast Air Quality Management District

The SCAQMD is the air pollution control district for Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that the SCAB region meets attainment for the federal and state standards. The SCAQMD is responsible for preparing an air quality management plan in order to meet federal attainment status. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

SCAQMD Rules and Regulations

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the proposed project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.[26]

- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.[27]

[26] South Coast Air Quality Management District. 1976. *Rule 402. Nuisance*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

[27] South Coast Air Quality Management District. Amended 2005. *Rule 403. Fugitive Dust*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-uses of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.[28]

- **Rule 445 (Wood-Burning Devices)** – The purpose of this rule is to reduce the emission of particulate matter from wood-burning devices and establish contingency measures for applicable ozone standards for the reduction of volatile organic compounds.

  The rule requires that any new residential or commercial development that begins construction on or after March 9, 2009 only install gaseous-fueled fireplaces and stoves.[29]

Local

Air Quality Element of the Los Angeles General Plan

The *Air Quality Element of the City of Los Angeles General Plan* (Air Quality Element) was adopted on November 24, 1992, and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies.[30] The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and

28 South Coast Air Quality Management District. Amended 2016. *Rule 1113. Architectural Coatings*. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24.

29 South Coast Air Quality Management District. 2019. *Rule 445 – Wood Burning Devices Local Government, Builder, Contractor, Architect Answers to Frequently Asked Questions (FAQs).* Available online at: http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-445/detailed-rule-445-information.pdf.

30 City of Los Angeles Planning Department. 1992. *Air Quality Element*. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of State and Federal air quality standards.

Relevant to the proposed project, the Air Quality Element establishes the following goals and policies aimed to reduce air quality emissions across the City of Los Angeles:

Goal 1. Good air quality and mobility in an environment of continued population growth and healthy economic structure.

> **Objective 1.1.** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
>
> > **Policy 1.1.1.** Encourage demonstration projects which involve creative and innovative uses of market incentive mechanisms to achieve air quality objectives.
>
> **Objective 1.3.** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
>
> > **Policy 1.3.1.** Minimize particulate emissions from construction sites.
> >
> > **Policy 1.3.2.** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

Goal 2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.

> **Objective 2.2.** It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.
>
> > **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.

Goal 3. Efficient management of transportation facilities and system infrastructure using cost effective system management and innovative demand management techniques.

> **Objective 3.2.** It is the objective of the City of Los Angeles to reduce vehicular traffic during peak periods.

Policy 3.2.1. Manage traffic congestion during peak periods.

Goal 4. Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1. It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1. Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Policy 4.1.2. Ensure that project level review and approval of land use development remain at the local level.

Objective 4.2. It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

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.

Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4. Require that air quality impacts to be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

Wilshire Community Plan

The Wilshire Community Plan was updated in 2002 and includes about 8,954 acres of the Mid-City section of Los Angeles. The eastern edge of the Community Plan Area is about six miles west of Downtown Los Angeles, while the western edge abuts the City of Beverly Hills. The

Wilshire Community Plan Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major streets including Wilshire Boulevard, Pico Boulevard, La Cienega Boulevard, Western Avenue, and Vermont Avenue. The plan area east of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center.[31] The Wilshire Community Plan sets forth planning goals and objectives to maintain the community's distinctive character, the goals and objectives relevant to this proposed project include:

Goal 1. Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community.

> **Objective 1-1.** Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.
>
> > **Policy 1-1.3.** Provide for adequate Multiple Family residential development.
> >
> > **Policy 1-**1.4. Provide for housing along mixed-use boulevards where appropriate.
>
> **Objective 1-2.** Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.
>
> > **Policy 1-2.1.** Encourage higher density residential uses near major public transportation centers.
>
> **Objective 1-4.** Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.
>
> > **Policy 1-4.1.** Promote greater individual choice in type, quality, price and location of housing.
> >
> > **Policy 1-4.2.** Ensure that new housing opportunities minimize displacement of residents.

[31] City of Los Angeles. 2001. *Wilshire Community Plan.* Available online at: https://planning.lacity.org/odocument/3333424a-21b9-4f7b-86db-064926b9dcb9/Wilshire_Community_Plan.pdf.

Policy 1-4.3. Encourage multiple family residential and mixed-use development in commercial zones.

The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

a. Conflict with or obstruct implementation of any applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

SCAQMD drafted the 2016 AQMP.[32] As described above, the 2016 AQMP was developed in effort with CARB, SCAG, and the U.S. EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieves CAAQS and NAAQS. The plan's pollutant control strategies are based on SCAG's 2016 RTP/SCS. While SCAG adopted the updated Connect SoCal 2020-2045 RTP/SCS in September 2020, it has not been incorporated into an applicable air quality plan.

Criteria for determining consistency with the AQMP are defined in Chapter 12, § 12.2 and § 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following:

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the years of the project build-out phase.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under Impact 2 below, the project would not exceed the short-term construction standards or long-term operational standards and in so doing would not violate any air quality standards (see **Table IV.3-6** and **Table IV.3-7**). As such, no significant impact would occur, and the proposed project would be consistent with first criterion.

Concerning Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. According to Connect SoCal, the City of Los Angeles is projected to grow by 837,500 residents, 426,000 households, and 287,600 jobs,[33] The proposed project would increase local population by 695

32 South Coast Air Quality Management District. 2016. *Air Quality Management Plan*. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

33 Southern California Association of Governments. 2020. *Connect SoCal Demographics and Growth Forecast*. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.

residents and will result in a net decrease of 68 employees.[34, 35] Therefore, proposed project is consistent with the land use designation and development density prepared in the City of Los Angeles' General Plan and the projections from Connect SoCal. Therefore, the proposed project would not exceed the population or job growth projections used by the SCAMQD to develop the 2016 AQMP. Thus, no significant impact would occur, as the proposed project is also consistent with the second criterion.

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

Less Than Significant Impact. A project may have a significant impact if project-related emissions would result in a cumulatively considerable net increase for an criteria pollutant for which the region in nonattainment under applicable federal or state ambient air quality standards. The cumulative analysis of air quality impacts follows the SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended daily threshold.

Regional Construction Significance Analysis

Construction associated with the proposed project would generate short-term emissions of criteria air pollutants.[36] The criteria pollutants of primary concern within the proposed project area include ozone-precursor pollutants (i.e., ROG and NO_x), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading and excavation, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces.

34 Estimated population based on CalEEMod modeling, see Attachment A. Estimated employment numbers based on the Los Angeles Unified School District 2020 Developer Fee Justification Study for Neighborhood Commercial Center which estimates 2.71 employees per 1,000 square feet. The existing site generates approximately 98 employees (2.71 employees/1,000 square feet x 36,300 square feet) and the proposed project will generate approximately 30 employees (2.71 employees/1,000 square feet x 10,900 square feet). As a result, the proposed project will result in a net decrease in 68 employees.

35 Los Angeles Unified School District. 2020. 2020 Developer Fee Justification Study. Available online at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf.

36 California Air Resources Board. *Construction & Earthmoving Equipment*. Available online at: https://ww2.arb.ca.gov/our-work/topics/construction-earthmoving-equipment.

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the proposed project is estimated to last approximately 2.5 years, beginning in July 2022. Construction-generated emissions associated with the proposed project were calculated using the SCAQMD- and CARB-approved CalEEMod model. CalEEMod is designed to model construction and operational emissions for land use development projects. The model incorporates typical construction requirements such as construction equipment, demolition debris, and hauling trips. The assumptions used in the CalEEMod model, including construction equipment usage, the demolition of approximately 12,936 tons of the existing structure and surface pavement, and grading quantity of approximately 65,095 cubic yards of soil export, were based on information provided by the project applicant. In addition, the project applicant provided estimates of the construction equipment expected to be used during each phase of project construction as well as the expected usage during that phase of construction.[37] Predicted maximum daily construction-generated emissions for the proposed project are summarized in **Table IV.3-6, Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day.**

During construction, the contractors are required to comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), among others, which assist in reducing short-term construction-related air pollutant emissions. Rule 402 prohibits emissions that would cause a public nuisance and Rule 403 requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. The proposed project would be subject to Rules 402, 403, and 113 described in the Regulatory Framework subsection above. As shown below, all criteria pollutant emissions would remain below their respective thresholds. Thus, the proposed project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

37 See Appendix B, Attachment A for project construction assumptions.

Table IV.3-6
Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day

Construction Year	ROG	NO_x	CO	SO_2	PM10	PM2.5
2022	3.48	46.78	27.40	0.13	7.55	2.36
2023	1.83	12.57	16.93	0.05	3.38	1.16
2024	36.71	19.04	28.85	0.08	4.38	1.64
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Impact Sciences, CalEEMod modeling, 2021. See Appendix B, Attachment A.
Note: Project emissions account for the reductions from SCAQMD Rule 403 (Fugitive Dust).

Regional Operational Significance Analysis

Project-generated emissions would be associated with motor vehicle use, energy use, and area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, consumer cleaning products, and architectural coatings associated with the operation of a 242-unit apartment building, 10,900 square feet of commercial space, and a 354-space subterranean parking garage. The proposed project will also convert Carling Way and a surface parking lot on the northern end of the proposed project Site to publicly accessible open space. The proposed project will be replacing an existing two-story multi-tenant commercial structure and surface parking lots.[38] The operational emissions were from the proposed project and existing project were calculated within CalEEMod and the net operational emissions were compared against SCAQMD regional thresholds to determine project significance.

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher emission rates used by CalEEMod. The earliest year the project could possibly be constructed and fully occupied would be 2025. Emissions associated with build-out later than 2025 would be lower, because newer vehicles have to meet increasingly more stringent emissions standards, while older, more polluting, vehicles are used less.[39]

CalEEMod allows the user to enter specific vehicle trip generation rates. The Transportation Assessment Memorandum of Understanding (MOU) prepared by Los Angeles Department of

38 The size of the existing commercial building and estimated daily trip rate consistent with the Los Angeles Department of Transportation's Memorandum of Understanding for the 5001 Wilshire Boulevard Project prepared May 2020.

39 Refer to CARB's Emissions Factors (EMFAC2017) modeling which demonstrates the reduction in average fleetwide vehicle emissions for each subsequent year.

Transportation (included in **Appendix H** of this SCEA) estimates that the proposed project will generate 1,666 trips per day and the existing Project Site generates 1,370 trips per day. As a result, the project will result in a net increase of 296 trips per day.

Long-term operational emissions attributable to the proposed project are summarized in **Table IV.3-7, Long-Term Operational Emissions – Maximum Pounds per Day**.

Table IV.3-7
Long-Term Operational Emissions – Maximum Pounds per Day

Source	ROG	NO_x	CO	SO_2	PM10	PM2.5
Proposed Project Emissions						
Area Source	6.54	3.66	21.52	0.02	0.39	0.39
Energy Use	0.07	0.57	0.24	0.004	0.05	0.05
Mobile Source	2.36	10.16	30.50	0.12	10.94	2.99
Total	8.96	14.39	52.26	0.15	11.38	3.42
Existing Project Emissions						
Area	1.06	>0.001	>0.001	0.00	>0.001	>0.001
Energy	0.002	0.02	0.013	>0.01	>0.01	>0.01
Mobile	2.12	9.16	22.59	0.07	5.60	1.54
Total	3.18	9.18	22.61	0.07	5.61	1.54
Net Operational Emissions	*5.78*	*5.21*	*29.65*	*0.08*	*5.77*	*1.88*
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Impact Sciences, CalEEMod modeling, 2021. See Appendix B, Attachment A.

As shown in **Table IV.3-6** and **Table IV.3-7**, the proposed project's construction and operational emissions would not exceed the SCAQMD's thresholds for any criteria air pollutants. Therefore, regional construction and operational emissions would not result in a significant long-term regional air quality impact. According to the SCAQMD, the district uses the same regional significance thresholds for project specific and cumulative impacts.[40] Thus, the proposed project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Therefore, regional construction and operation operational emissions would not result in a

40 South Coast Air Quality Management District. 2003. *Cumulative Impacts White Paper Appendix A*. Available online at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf

significant long-term regional air quality impact and would not result in a cumulative air quality impact.

Air Quality Health Impacts

On December 24, 2018, the California Supreme Court published its opinion on the *Sierra Club et al. v. County of Fresno et. Al.* (Case No. S219783) which determined that an environmental review must adequately analyze a project's potential impacts and inform the public how its bare numbers translate to a potential adverse health impacts or explain how existing scientific constraints cannot translate the emissions numbers to the potential health impacts.

SCAB is in state non-attainment for PM2.5, PM10, and O_3 and federal non-attainment for PM2.5 and O_3. Therefore, an increase in emissions of particulate matter or ozone precursors (ROG and NOx) has the potential to push the region further from reaching attainment status and, as a result, are the pollutants of greatest concern in the region. As noted in **Table IV.3-6** and **Table IV.3-7** above, the proposed project will emit criteria air pollutants during construction and operation**.** However, the proposed project will not exceed SCAQMD thresholds for ozone precursors (ROG and NO_x), PM2.5, PM10, or any other criteria air pollutants, and will not result in a cumulatively significant impact for which the region is in non-attainment. This discussion focuses on the health effects from the pollutants for which the region is in non-attainment and why it is not feasible to provide an analysis to relate the emissions of ozone precursors from an individual project to likely health consequences.

Exposure to particulate matter can affect both a person's lungs and heart and has been linked to a variety of health problems including aggravated asthma, decreased lung function, and increased respiratory symptoms. DPM is a type of particulate that is emitted from diesel engines and is estimated to cause approximately 70% of total known cancer risks related to air toxics in California.[41] As discussed below, see **Impact 3**, the proposed project would not result in an increased health risk as a result from exposure to DPM or other TACs. Further, since the proposed project will not exceed SCAQMD regional thresholds for particulate matter, the proposed project will not result in a cumulatively significant impact to particulate matter in the region.

Exposure to O_3 can cause respiratory irritation, lung damage, aggravate asthma, and may worsen existing chronic lung diseases such as emphysema and chronic bronchitis.[42] O_3 is formed in the

41 California Air Resources Board. *Overview: Diesel Exhaust & Health*. Available online at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

42 U.S. Environmental Protection Agency. *Ozone and Your Health*. Available online at: https://www.airnow.gov/sites/default/files/2020-02/ozone-c.pdf.

atmosphere when heat and sunlight cause a chemical reaction between NOx and ROG emissions. NOx and ROG are referred to as ozone precursors and affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the proposed project's less than significant increases in regional air pollution from criteria air pollutants would not have measurable effect on the human health implications of the Basin's ambient air quality.

The Congressional Research service prepared the *Background Ozone: Challenges in Science and Policy* report for U.S. Congress which provides a summary of the scientific capabilities of measuring ozone and understanding the needs and improvements necessary to understand contributions from background sources. While this paper specifically addresses background concentrations of ozone and ozone modeling, it demonstrates the difficulty in assessing ozone and related health implications from any single source or project. According to the Congressional Research Service, currently there are several data and analytical challenges to reliably assess background ozone concentrations and to model ozone. First, the current understanding of the amount, location, and type of pollutant emissions from many types of sources is insufficient. Therefore, inventories typically provide estimation, which may not be precise enough for apportioning contributions. Second, meteorological data (i.e., wind speed, wind direction, temperature, cloud cover, humidity, etc.) is not currently measured at a fine enough spatial scale to adequately represent relevant weather processes. Third, data on pollutant concentrations are limited, which increases the challenges of understanding ozone formation and movement. Fine spatial and temporal measurements are needed both horizontally across the surface and vertically to higher levels of the atmosphere. Finally, background ozone source contributions change by year, season, day, and hour and from location to location.[43]

While several models and tools are available to quantify emissions, these models are limited by a number of factors in their ability to determine health impacts of individual development projects. The U.S. EPA currently performs health impact assessments (HIAs) using the Community Multiscale Air Quality (CMAQ)[44] model for pollutant transport modeling and Environmental Benefits Mapping and Analysis Program – Community Edition (BENMAP – CE) for health impact

43 Congressional Research Service. 2019. *Background Ozone: Challenges in Science and Policy*. Available online at: https://fas.org/sgp/crs/misc/R45482.pdf.

44 U.S. Environmental Protection Agency. *CMAQ: Community Multiscale Air Modeling System*. Available online at: https://www.epa.gov/cmaq.

calculations.[45] However, these models are designed to estimate health impacts over a large scale (e.g., city-wide, state-wide). In addition, the CMAQ model requires inputs such as regional sources of pollutants and global meteorological data, which are not readily accessible. In general, the current suite of available models are not able to accurately model concentrations or dispersion of ozone because they are regional models unable to provide accurate results for individual projects. If reliable ozone concentrations can be determined, there is also limitation on being able to correlate concentrations to related health effects.

The SCAQMD acknowledges that quantifying the health impacts from O_3 is difficult. The *2012 Air Quality Management Plan* determines that a reduction of 432 tons (864,000 pounds) per day of NO_x and a reduction of 187 tons (374,000 pounds) per day of VOC would reduce O_3 levels at the highest monitored site by only nine parts per billion.[46] Meaning, large reductions in precursor emissions translate to incremental reductions in measured ozone. Therefore, quantifying O_3 and related O_3 health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) is limited. Thus, as the proposed project would not exceed SCAQMD thresholds for construction and operational air emissions (see **Table IV.3-6** and **Table IV.3-7**), it can be reasonably concluded that the proposed project would not have a measurable effect on the human health in the Basin's, nor would it have implications for the ambient air quality. As a result, the proposed project would have a less than significant impact for air quality health impacts.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The proposed project has the potential to expose nearby sensitive receptors to air toxics during construction and operation. A full discussion of the impacts is provided in the Air Quality and Greenhouse Gas Technical Study, see **Appendix B**.

45 U.S. Environmental Protection Agency. *Environmental Benefits Mapping and Analysis Program – Community Edition (BenMAP – CE)*. Available online at: https://www.epa.gov/benmap.

46 South Coast Air Quality Management District. *Final 2012 AQMP*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan.

Localized Significance Thresholds

Construction

The nearest sensitive receptors to the proposed project Site are residents located approximately 20 feet north of the proposed project Site (see above). To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction.

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAMQD provided the *Final Localized Significance Threshold Methodology* for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific analysis.

As detailed above, the SRA for the LST is the Central LA County area (SRA 1) since this area includes the proposed project site. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAMQD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. The proposed project site is approximately 1.685-acres, therefore, the LST threshold for two acres was used for the construction LST analysis.

The SCAQMD's methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptor to the proposed project site is a single-family residence approximately 20 feet north of the proposed project site. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at 25 meters were utilized in this analysis.

Table IV.3-8, Localized Significance of Construction Emissions – Maximum Pounds per Day, presents the proposed project's localized emissions during construction activity. As shown in **Table IV.3-8**, the on-site air pollutant emissions on the peak day of construction (with assumed compliance of SCAQMD Rule 403) would not exceed the applicable LST. Therefore, the proposed project's localized air quality impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Table IV.3-8
Localized Significance of Construction Emissions – Maximum Pounds per Day

Construction Year	NO_x	CO	PM10	PM2.5
2022	27.35	22.74	6.18	1.95

2023	8.42	7.68	0.37	0.34
2024	14.83	18.24	0.68	0.63
LST Screening Threshold	**108**	**1,048**	**8**	**5**
Exceed?	***No***	***No***	***No***	***No***

Source: Impact Science, CalEEMod modeling, 2021. See Appendix B, Attachment A.
Note: Building Construction, Paving, and Architectural Coating phases will all overlap in 2024. The on-site maximum daily emissions during each phase were added together to provide the most conservative assessment of possible emissions on the proposed project Site.

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The project is proposing a mixed-use development with 242 residential units and 10,900 square feet of commercial space and, therefore, does not include warehousing or transfer facilities that will result in long periods of queuing or idling vehicles. Thus, due to the lack of queuing and idling emissions, no long-term localized significance threshold analysis is needed. The proposed project's operational LST impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Localized Air Quality Health Impacts

As evaluated above, the proposed project's air emissions would not exceed the SCAQMD's LST thresholds. Therefore, the project would not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS for emissions of CO, NO_x, PM10, or PM2.5. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons are protected. In other words, the ambient air quality standards are purposely set in a stringent manner to protect children, elderly, and those with existing and respiratory problems. Thus, air quality health impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and attainment area for state standards. CO emissions have declined in recent years even as Vehicle Miles Traveled (VMT) on urban and rural roads have increased nationwide. Estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[47] Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 ppm, the CAAQS for 8-hour ozone. The SCAQMD prepared a detailed CO analysis in the *Federal Attainment Plan for Carbon Monoxide* as part of the 2003 AQMP.[48] The 2003 AQMP is the most recent AQMP that addresses CO concentrations. The CO analysis included microscale modeling of CO at the worst-case intersections in SCAB. Of these locations, the Wilshire Boulevard and Veteran Avenue intersection in Los Angeles experienced the highest CO concentration of 4.6 ppm. At the time of analysis, the Wilshire Boulevard and Veteran Avenue intersection was the most congested intersection in Los Angeles County with an average daily traffic volume of approximately 100,000 vehicles per day. As CO impacts at the Wilshire Boulevard and Veteran Avenue intersection did not exceed the 8-hour CAAQS, it can be inferred that the intersections near the proposed project Site, which generate fewer vehicles per day, would not create any CO hotspots. Furthermore, as previously discussed, the site is located in SRA 1, Central Los Angeles County. The monitoring station closest to the proposed project site is the Los Angeles – North Main Street station, located at 1630 North Main Street approximately 6.44 miles east of the proposed project site. According to data obtained from the EPA's AirData database for CO pollutants, the highest eight-hour concentration reported for the VA Hospital, West Los Angeles station in 2020 was 1.6 ppm.[49] As such, the background CO concentration in combination with the CO concentration at worst-case scenario intersection in SCAB do not exceed 9.0 ppm and a CO hotspot would not occur. Therefore, the proposed project's CO hotspot impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

47 U.S. Environmental Protection Agency. 2018. *Report on the Environment: Carbon Monoxide Emissions*. Available online at: https://cfpub.epa.gov/roe/indicator.cfm?i=10.

48 South Coast Air Quality Management District. *2003 Air Quality Management Plan*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

49 U.S. Environmental Protection Agency. 2018. *Monitor Values Report*. Available online at: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

Diesel Particulate Matter

Project Construction

Construction would result in the generation of diesel particulate matter (diesel PM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

Generally, the use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodology for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). Therefore, short-term construction activities would not generate a significant health risk.

Additionally, the proposed project site is approximately 1.69 acres. Generally, construction for projects contained in a site of such size to represent less than significant health risk impacts due to limitations of the off-road diesel equipment able to operate and thus a reduced amount of generated DPM, reduced amount of dust-generating ground-disturbance possible compared to larger construction sites, and reduced duration of construction activities compared to the development of larger sites. Furthermore, construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5-minutes periods, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.[50] For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the proposed project would have a less than significant impact.

Project Operation

The greatest potential during long-term operations for exposure to TACs is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel.[51] The proposed project is a 242-

[50] California Air Resources Board. 2015. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel-Fueled (Off-Road Regulation)*. Available online at: https://ww3.arb.ca.gov/msprog/ordiesel/faq/idlepolicyfaq.pdf.

[51] California Air Resources Board. *Overview: Diesel Exhaust & Health*. Available online at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

unit residential development with 10,900 square feet of commercial space. Once operational, the majority of vehicle trips to the Project Site would be from residents and employees and, as a result, the proposed project would attract very few diesel truck trips. Additionally, the Project does not propose any stationary generators on-site.

Furthermore, the existing Project Site includes a two-story commercial building that attracts heavy-duty vehicle truck trips from vendors and includes a dry-cleaning facility that uses solvents that can cause TAC emissions. The proposed project will replace these land uses and emissions sources from the Project Site by constructing a residential development with 10,900 square feet of commercial space, which is significantly less than what is currently on the site. For these reasons, once operational, the proposed project would not expose nearby sensitive receptors to substantial amounts of air toxics and the project would have a less than significant impact.

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

Less Than Significant Impact. The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. Once operational, the proposed project will serve as a residential and office development with minor retail uses. The proposed project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

Construction activities associated with the proposed project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon proposed project completion. In addition, the proposed project would be required to comply with the California Code of Regulations, Title 13, § 2449(d)(3) and §2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The proposed project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and not substantial. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

4. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐
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?	☐	☐	☐	☒

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 Game or U.S. Fish and Wildlife Service?

No Impact. The City of Los Angeles is rich in natural habitats including wetland habitat, mountains, and beaches, with an abundance of biological diversity within those habitats. The California Department of Fish and Wildlife has a database in which it provides information for communities across the State that have conservation plans which it is a signature to. However, the proposed project is located within a developed urban area, and there are no known unique, rare or endangered plant or animal species or habitats on or near the site. Moreover, the Wilshire community is not within an identified Natural Community Conservation or Habitat Plan.[52] Therefore, there would be no impacts to local or regional plans.

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

No Impact. The Project Site has been previously developed within an urbanized setting. According to the California Department of Fish and Wildlife's data, no riparian or other sensitive natural community are located on or adjacent to the Project site.[53] The Project Site is also not located within a significant ecological area as determined by the City or County of Los Angeles.[54] Therefore, no impacts would occur.

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. Drainage courses with definable bed and bank and their adjacent wetlands are "waters of the United States" and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are

52 California Department of Fish and Wildlife, Natural Community Conservation Plans/Habitat Conservation Plans. Available online at: https://wildlife.ca.gov/conservation/planning/nccp/plans, accessed March 18, 2021.

53 California Department of Fish and Wildlife, Lands Interactive Map. Available online at: https://apps.wildlife.ca.gov/lands/, accessed March 18, 2021.

54 City of Los Angeles General Plan. 2001. *Conservation Element*. Available online at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

dominated by wetland vegetation, and are inundated with water for a portion of the growing season.

The Project is located in a developed urban area, and there is no naturally occurring wetland habitat near the Site. The Project Site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

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

Less Than Significant Impact. The Project is located in a fully developed urban community. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the project site or in the surrounding area. However, the site has five existing trees (four onsite and one street tree), refer to **Appendix C, Tree Report**. The four onsite trees would be removed, while the street tree would be retained. The trees are ornamental and nonnative species; however, they may provide suitable habitat, including nesting habitat, for migratory birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The proposed project will be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. In addition, the proposed project would replace an existing surface parking lot with green space and plant up to 61 new trees. Given the urban landscape and lack of vegetation, the Project Site is not located in an area known for migratory bird movement;[55] however, the additional trees in the proposed development would potentially enhance migratory movement. As such, impacts would be less than significant.

55 National Audubon Society, Spring Migration in California. Available online at: https://ca.audubon.org/news/spring-migration-california, accessed March 30, 2021.

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

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

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

As previously discussed, there are four trees on the project site, and one street tree within the public right-of-way located on South Highland Avenue. All of these trees are of common ornamental species; none of the trees are of a protected species as defined above (refer to **Appendix C, Tree Report**). Project construction proposes to remove all of the existing onsite trees and retain the existing street tree, an Arizona ash. However, it is possible that due to the poor health, structure, and aesthetic value, this tree may also be removed. It is the City's Street Tree policy to require the replacement any street trees removed during project construction. Specifically, the City's policy is to replace all significant, non-protected trees (defined as eight inches (8") in diameter at breast height (DBH)) at a 1:1 ratio with a minimum 24-inch box size tree. Further, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan shall demonstrate the minimum replacement ratio of 1:1 for the existing, significant street trees and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to

certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Following the implementation of the City's standard policies and procedures, impacts would be less than significant.

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

No Impact. The Project site is not located in any local, regional, or State mapped conservation area nor is it part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[56] Therefore, no impacts would occur.

5. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Less Than Significant Impact. Section 15064.5(b) of the CEQA Guidelines states that a project would have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the CEQA Guidelines defines a historic resource as: 1) listed in, or determined to be eligible for listing, in the California

56 City of Los Angeles Significant Ecological and Coastal Resource Areas Policy Map, and CDFW, "NCCP Plan Summaries," Available online at: https://www.wildlife.ca.gov/conservation/planning/nccp/plans, accessed March 18, 2021.

Register of Historical Resources (California Register); 2) included in a local register of historical resources; or 3) identified as significant in an historical resources survey. Any object, building, structure, site, area, place, record, or manuscript may be historically significant if the resource meets the criteria for listing on the California Register.[57] The California Register automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (National Register).

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

1. Associated with events that have made a significant contribution to American history;

2. Associated with the historical significant persons;

3. Embody distinctive characteristics of a type, period, or method of construction/work of a master; possess high artistic values; or represent a significant and distinguishable entity; or

4. Yield information important in prehistory or history.

To be eligible for listing in the California Register, a property generally must be at least 50 years of age and be significant at the local, state, or national level under one or more of the following four criteria:

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

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

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

4. Yielded information important in the prehistory or history of the local area, California, or the country.

57 CEQA Guidelines §15064.5(a)(3).

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.

This Project consists of the demolition of existing commercial structures and construction of a mixed-used development to accommodate retail and housing space. The buildings proposed for demolition were constructed in 1987[58]; therefore, they are less than 50 years old and would not trigger environmental review according to state and national guidelines. per the CEQA Guidelines because they are less than 50 years old.

The Project Site is situated at the boundary of the Hancock Park Historic Preservation Overlay Zone (HPOZ), which captures most of the Hancock residential neighborhood and Wilshire Country Club.[59] HPOZ is a zoning tool that protects and preserves neighborhoods composed of architecturally and historically significant structures. A type of historic district, HPOZs primarily protect single-family residential neighborhoods. However, the project in question lies just at the boundary of the overlay zone and currently consists of a commercial strip mall with chain restaurants and small businesses. Moreover, the buildings were constructed in the late 1980s, whereas the majority of residences in Hancock Park that are protected were built in 1920s. The Los Angeles Historic Resources Inventory includes properties directly north of the Project Site, but nothing within the Site's boundaries of South Highland Avenue, Wilshire Boulevard, Carling Way, and South Citrus Avenue.[60]

In a memorandum dated December 3, 2020 written by Shannon Davis of ASM Affiliates in regards to Preliminary Historic Resources Review for Parking Lot near 5001 Wilshire Boulevard, 671 South Highland Avenue, 688 South Citrus Avenue in Hancock Park HPOZ, prepared in anticipation of the proposed project (refer to **Appendix D**), the Project includes a green belt to be utilized as publicly accessible Common Open Space that would extend behind the development, through Carling Way, and to a vacant parcel immediately north of the Project Site. The memo indicated that the parcel at 671 South Highland Avenue would be exempt from planning review and is considered neither a Contributor nor a Non-Contributor to the HPOZ. The original property was demolished in 1987 and no resources, including landscaping, remain on the parcel. Such parcels are not removed from the HPOZ or re-designated as Contributors or Non-Contributors, and action beyond HPOZ review is not needed for the proposed development of a green belt.

58 ZIMAS. LA City. Available online at: http://zimas.lacity.org/, accessed March 17, 2021.

59 Hancock Park Historic Preservation Overlay Zone Map. Available online at: https://planning.lacity.org/odocument/a64141c3-eb96-4a96-8bbd-0b73f27bd40d/Hancock_Park_SRVY.pdf.

60 Los Angeles Historic Resources Inventory, interactive map. Available online at: http://historicplacesla.org/map, accessed March 17, 2021.

Therefore, the proposed Project involving demolition of these buildings and inclusion of green space as part of the final Project would create a less than significant impact to historical resources.

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

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

The project site is located in a highly urbanized area of the City and has been previously disturbed and developed. Further, the Native American Heritage Commission conducted a record search of the Sacred Lands File which did not identify any sites on the property.[61] However, construction of the proposed project will include a three level subterranean parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the project site during grading or other construction activities, the Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the City, has evaluated the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by § 21083.2 of the PRC, the site shall be treated in accordance with the provisions of § 21083.2 of the PRC. If the find is determined not to be a unique archeological resource, no further action is necessary, and construction may continue. Compliance with these protocols would reduce impacts to a less than significant level.

MM-CUL-1: The Applicant shall retain a qualified archaeological monitor who meets the Secretary of the Interior's Professional Qualifications Standards for an archaeologist

61 Native American Heritage Commission, correspondence dated April 20, 2021, refer to Appendix D.

who shall be present during construction excavations such as grading, trenching, grubbing or any other construction excavation activity associated with the Project. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill soils, and the depth of excavation, and if found, the abundance and type of archaeological resources encountered.

MM-CUL-2: In the event that archaeological resources are unearthed during ground-disturbing activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Work shall be allowed to continue outside of the vicinity of the find. All archaeological resources unearthed by Project construction activities shall be evaluated by the archaeologist. The Applicant shall coordinate with the archaeologist and the City to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register or potentially qualify as unique archaeological resources pursuant to CEQA. In the event the archaeological resources are prehistoric, the archaeological monitor shall coordinate with the Applicant and the City to retain a Native American Representative from the Gabrieleno/Tongva San Gabriel Band of Mission Indians tribe to help determine the appropriate treatment for the resources and whether Native American construction monitoring is warranted in the area of the find thereafter. If avoidance of the resource is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource from the Project Site.

c. Would the project disturb any human remains, including those interred outside of formal ceremonies?

Less Than Significant Impact. The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains, and human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code § 7050.5, PRC § 5097.98, and CEQA Guidelines § 15064.5(e). Pursuant to these codes, in the event that human remain are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human

remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in § 5097.98 of the PRC. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level.

6. Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact may occur if the Project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation.

Petroleum Fuel

The proposed project would not create an increase in enough demand such that new energy sources would be required. Construction of the proposed project would result in short-term consumption of petroleum-based fuels to power construction vehicles and equipment. During

construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project Site, for construction worker travel to and from the Project Site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. Specifically, during construction, the proposed project is anticipated to consume approximately 64,437 gallons of gasoline and 78,979 gallons of diesel, see **Table IV.6-1, On-Road Construction Fuel Consumption** and **Table IV.6-2, Off-Road Construction Fuel Consumption**.

Table IV.6-1
On-Road Construction Fuel Consumption

Phase	Number of Trips	Number of Days	Average Commute Distance (in miles)	Fuel Usage (mpg)	Gasoline/Diesel Usage (in gallons)
Worker Trips (Gasoline)					
Demolition	28	22	10.8	24.2	275
Grading	20	66	10.8	24.2	589
Building Construction	238	587	10.8	24.2	62,348
Paving	13	45	10.8	24.2	261
Architectural Coating	48	45	10.8	24.2	964
			Total Gasoline Usage		**64,437**
Vendor Trips and Hauling Trips (Diesel)					
Demolition	1,279		7.3	5.3	1,765
Grading	9,300		7.3	5.3	12,834
Building Construction	51		7.3	6.5	57
			Total Diesel Usage		**14,656**

Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, Appendix B, Attachment A.
Bureau of Transportation Statistics. Average Fuel Economy by Major Vehicle Category. Available online at: https://afdc.energy.gov/data/10310.

Table IV.6-2
Off-Road Construction Fuel Consumption

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage/HP/hr	Diesel Usage (in gallons)
Demolition	Concrete/ Industrial Saws	3	8	81	0.73	22	0.05	1,561
	Crawler Tractors	1	8	212	0.43	22	0.05	802

	Excavators	1	8	158	0.38	22	0.05	528
	Rubber Tired Dozers	1	8	247	0.40	22	0.05	869
	Signal Boards	4	8	6	0.82	22	0.05	173
	Skid Steer Loader	1	8	65	0.37	22	0.05	212
Grading	Crawler Tractors	1	8	130	0.42	66	0.05	1,441
	Excavators	1	8	158	0.38	66	0.05	1,585
	Signal Boards	4	8	6	0.82	66	0.05	520
	Skid Steer Loader	1	8	65	0.37	66	0.05	635
	Tractors/Loaders/ Backhoes	1	7	97	0.37	66	0.05	829
Building Construction	Cranes	2	8	231	0.29	587	0.05	31,459
	Excavators	1	8	158	0.38	587	0.05	14,097
	Tractors/Loaders/ Backhoes	1	6	97	0.37	587	0.05	6,320
Paving	Cement and Mortar Mixers	1	6	9	0.56	45	0.05	68
	Pavers	1	6	130	0.42	45	0.05	737
	Paving Equipment	1	8	132	0.36	45	0.05	855
	Rollers	1	7	80	0.38	45	0.05	479
	Tractors/Loaders/ Backhoes	1	8	97	0.37	45	0.05	646
Architectural Coating	Air Compressors	1	6	78	0.48	45	0.05	505
							Total Diesel Consumption	***64,323***

Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, Appendix B, Attachment A. Fuel usage estimate of 0.05 gallons per horse-power-hour is from SCAQMD CEQA Air Quality Handbook, Table A9-3E.

The additional petroleum fuel resources used during construction would not cause a significant reduction in available supplies. Further, the proposed project contractors will be required to adhere to CARB regulations that govern construction equipment retrofitting, repowering, or replacements of construction equipment. CARB has also adopted 5-minute limits to heavy-duty diesel trucks idling in order to reduce diesel particulate matter which will also work to limit diesel fuel use. Compliance with CARB regulations would result in an efficient use of construction-related petroleum fuel use.

During operation, motor vehicle travel and building maintenance equipment would consume petroleum-based fuels. Fuel consumption of motor vehicles in California is regulated by the National Highway Traffic Safety Administration and EPA's Safer Affordable Fuel Efficiency (SAFE) Vehicles. The Project Site is located near the Wilshire/Highland Metro 20 bus station and the future Wilshire/La Brea Metro D Line Station which will encourage the use of transit to and from the project site. Furthermore, the proposed project will install bicycle parking which will

promote people to bike and reduce reliance on cars and will reduce petroleum demand during operation.

Natural Gas

Project construction, including demolition, grading, building construction, and painting, is not anticipated to use natural gas and, as a result, there will be no impact to natural gas resources during project construction.

During operation, the proposed project is anticipated to consume a net increase of approximately 2,198,064 1,000 British Thermal Units per year (kBTU/year), see **Table IV.6-3, Estimated Natural Gas Use.**

Table IV.6-3
Estimated Natural Gas Use

Land Use	Size	Total Use (kBTU/year)
Proposed Project		
Residential	242 du	2,239,720
Parking	354 spaces	0
Commercial	10,900 sf	17,876
Total Proposed Project Natural Gas Use		**2,257,596**
Existing Project		
Parking	39,800 sf	0
Commercial	36,300 sf	59,532
Total Existing Project Natural Gas Use		**59,532**
Net Natural Gas Use		**2,198,064**

kBTU = 1,000 British Thermal Units' du = dwelling unit; sf = square foot
Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study.

Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas). According to SoCalGas 2020 California Gas Report, utility-driven, statewide natural gas demand is projected to decline at an average rate of 1.0 percent a year through 2035. The decline in natural gas use can be attributed to energy efficiency programs and statewide efforts to produce lower carbon energy sources.[62] While Project operation will result in the consumption of natural gas, these statewide efforts and efficiency programs such as the Renewables Portfolio Strategy

62 California Gas and Electric Utilities. *2020 California Gas Report*. Available online at: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

and CalGreen building standards will lead to the efficient use of natural gas. The Renewable Portfolio Strategy is a regulatory mandate to increase production of energy from renewable sources such as wind, solar, biomass, and other alternatives to fossil fuel. The CalGreen building standards set thresholds for the natural gas efficiency of water heaters, furnaces, and household cooking appliances. Therefore, at the project-level there will be an efficient use of natural gas and result in the growing decrease in natural gas consumption.

Electricity

The proposed project would be constructed in accordance with all applicable laws and regulations, including state and federal laws, and building regulations pursuant to the LAMC and the LA Green Building Code. The proposed project will obtain energy from the Los Angeles Department of Water and Power (LADWP).

During construction of the Project, electricity would be consumed to supply and convey water for dust control and to power electric construction equipment as well as temporary lighting. Electricity use would be minor and cease upon the completion of construction.

During operation, the proposed project is anticipated to consume a net increase of approximately 619,399 kilo Watt-hour per year (kWh/year), see **Table IV.6-4, Estimated Project Electricity Demand**.

Table IV.6-4
Estimated Project Electricity Demand

Land Use	Size	Total Use (kWhr/year)
Proposed Project		
Residential	242 du	962,299
Parking	354 spaces	829776
Commercial	10,900 sf	147,150
Total Proposed Project Electricity Use		**1,109,449**
Existing Project		
Parking	39,800 sf	13,928
Commercial	36,300 sf	490,050
Total Existing Project Electricity Use		**490,050**
Net Electricity Use		**619,399**

kWhr= kilo Watt-hour; du = dwelling unit; sf = square foot
Source: Impact Sciences, 2021. See CalEEMod output files provided in the Air Quality and GHG Technical Study, Appendix B, Attachment A
.

The LADWP has a net capacity of 8,009 megawatts (MW), with the highest recorded peak being 6,502 MW.[63] Therefore, there is adequate supply capacity to service the proposed project. In addition, the Project is required to be in compliance with Title 24 and CalGreen Building Standards as well as LA Green Building Code. Electricity will be provided by LADWP and as a result, electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[64]

Accordingly, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency.

The proposed project would be required to comply with building regulations pursuant to the LAMC, and the LA Green Building Code. In addition, the Project would be required to comply with the 2019 CALGreen requirements, and would exceed the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24), and the LA Green Building Code, as applicable. As such, the proposed project would not obstruct or conflict with plans for renewable energy or energy efficiency. As such, the impacts would be less than significant.

7. Geology and Soils

The following analysis is based on the following report, included as **Appendix E** of this SCEA:

- **Geotechnical Investigation**, Proposed Multi-Family Residential Development 5001 W. Wilshire Boulevard, 671 South Highland Avenue & 668 South Citrus Avenue, Los Angeles, California, conducted by Geocon West, Inc.

The geotechnical investigation included a site reconnaissance, field exploration, laboratory testing, engineering analysis, and the preparation of the report. The site was explored on April 30, 2020 and May 1, 2020 by excavating five 8-inch diameter borings to depths between 15½ and 50½ feet below the existing ground surface using a truck-mounted hollow-stem auger drilling

63 Los Angeles Department of Water and Power. *Facts and Figures*. Available online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=idbmmh3qg_4&_afrLoop=395193534996386.

64 Los Angeles Department of Water and Power. 2008. *Rules Governing Water and Electric Service*.

machine. Laboratory tests were performed on selected soil samples obtained during the investigation to determine pertinent physical and chemical soil properties.

Geologic Setting

The site is located in the central portion of the Los Angeles Basin, a coastal plain bounded by the Santa Monica Mountains on the north, the Elysian Hills and Repetto Hills on the northeast, the Puente Hills and Whittier Fault on the east, the Palos Verdes Peninsula and Pacific Ocean on the west and south, and the Santa Ana Mountains and San Joaquin Hills on the southeast. The basin is underlain by a deep structural depression which has been filled by both marine and continental sedimentary deposits underlain by a basement complex of igneous and metamorphic composition. Regionally, the site is located within the northern portion of the Peninsular Ranges geomorphic province. This province is characterized by northwest-trending physiographic and geologic features such as the nearby Newport-Inglewood Fault Zone.

Soil and Geologic Conditions

Based on field investigation and published geologic maps of the area, the site is underlain by artificial fill and Pleistocene age older alluvial fan deposits consisting of predominantly interbedded sand, silt and clay.[65] A thin veneer of young Holocene age alluvial fan deposits are interpreted to mantle the older Pleistocene age sediments.

Artificial Fill

Artificial fill was encountered during field explorations to a maximum depth of 4 feet below The artificial fill generally consists of dark grayish brown to dark brown clay, sandy clay and clayey sand. The fill is characterized as moist to wet and soft or loose. The fill is likely the result of past grading or construction activities at the site. Deeper fill may exist between excavations and in other portions of the site that were not directly explored.

Older Alluvium

The fill soils are underlain by Pleistocene age older alluvial fan deposits that consist of brown to dark brown, grayish brown, olive brown, reddish brown, and bluish gray interbedded clay, sandy

65 California Geological Survey, 2012, Geologic Compilation of Quaternary Surficial Deposits in Southern California, Los Angeles 30' X 60' Quadrangle, A Project for the Department of Water Resources by the California Geological Survey, Compiled from existing sources by Trinda L. Bedrossian, CEG and Peter D. Roffers, CGS Special Report 217, Plate 9, Scale 1:100,000.

clay, clayey sand, silt, and silty sand. The older alluvium is characterized as primarily fine to medium-grained, slightly moist to wet, and soft to hard or loose to very dense.

Groundwater

Based on a review of the Seismic Hazard Zone Report for the Hollywood Quadrangle,[66] the historically highest groundwater level in the area is approximately 10 feet beneath the ground surface. Perched groundwater was encountered in boring B4 at a depth of approximately 33 feet below the existing ground surface. Based on the depth of the perched groundwater encountered in boring B4 and the lack of groundwater or seepage in the other borings (drilled to maximum depths of 50½ feet), groundwater is neither expected to be encountered during construction, nor have a detrimental effect on the project. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity.

Impact Analysis

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) __Cal.4th__ (Case No. S213478) (CBIA v. BAAQMD) held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts.

66 California Division of Mines and Geology, 1998, Seismic Hazard Evaluation of the Hollywood 7.5-Minute Quadrangle, Los Angeles, California, Seismic Hazard Zone Report SHZ026.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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

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

Less Than Significant Impact. By definition, a Holocene-active fault is one that has had surface displacement within Holocene time (about the last 11,700 years). A pre-Holocene fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive.

The site is not within a state-designated Alquist-Priolo Earthquake Fault Zone[67] nor a city-designated Preliminary Fault Rupture Study Area[68] for surface fault rupture hazards. No Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the site.[69]

The closest active fault to the site is the Newport-Inglewood Fault Zone located approximately 2.6 miles to the west-southwest. Other nearby active faults are the Hollywood Fault, the Santa Monica Fault, the Raymond Fault, and the Verdugo Fault located approximately 3.0 miles north, 3.4 miles west-northwest, 7.3 miles northeast, and 8.6 miles northeast of the site, respectively. The active San Andreas Fault Zone is located approximately 37 miles northeast of the site.

The geologic review does not indicate the presence of active surface faulting within or directly adjacent to the Site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low and impacts are considered less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes. The site could be subjected to strong ground shaking in the event of an earthquake.

67 California Geological Survey 2020b, Earthquake Zones of Required Investigation. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed May 5, 2020.

68 NavigateLA. City of Los Angeles. 2020. Available online at: website, http://navigatela.lacity.org, accessed March 24, 2020.

69 California Geological Survey 2020b, Earthquake Zones of Required Investigation. Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/ accessed May 5, 2020.

However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Impacts will be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards, which require design of structures to resist the effects of earthquake motions in accordance the American Society of Civil Engineers standards.[70,71] Furthermore, compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The State of California Seismic Hazard Zone Map for the Hollywood Quadrangle indicates that the site is not located within an area designated as having a potential for liquefaction. In addition, a review of the County of Los Angeles Safety Element indicates that the site is not located within an area identified as having a potential for liquefaction. The site is underlain by Pleistocene age alluvial sediments that are considered stiff to hard or medium dense to very dense and are not

70 California Building Code available at: https://up.codes/viewer/california/ibc-2018/chapter/16/structural-design#1613

71 Los Angeles Building Code available at: https://up.codes/viewer/los_angeles/ibc-2018

prone to liquefaction. As such, the potential for liquefaction and associated ground deformations beneath the site is very low and impacts are less than significant.

iv. Landslides?

Less Than Significant Impact. The topography at the site is relatively level and the topography in the immediate site vicinity slopes gently to the south-southwest. The site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[72] Also, the site is not located within an area identified as having a potential for seismic slope instability.[73] There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Project is considered low and impacts would be less than significant.

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

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

The Project Site is located in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site.

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

72 NavigateLA. City of Los Angeles. 2020. Available online at: website, http://navigatela.lacity.org, accessed March 24, 2020.

73 Earthquake Zones of Required Investigation, Hollywood Quadrangle. Released Nov. 6, 2014.

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

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

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed project will not occur and soil erosion impacts will be less than significant.

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

Less Than Significant Impact. As discussed above, the Site is not located within an 'Earthquake-Induced Landslide' zone.

Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The surficial blocks are transported downslope or in the direction of a free face, by earthquake and gravitational forces. The site is relatively flat and does not include a free-facing slope in proximity of the site. Therefore, the potential for lateral spreading is considered very low.

The site is underlain by Pleistocene age alluvial sediments that are considered stiff to hard or medium dense to very dense and are not prone to liquefaction. Based on the analysis in the geotechnical report, the soils encountered at the site are considered to have a low potential for liquefaction and impacts are considered less than significant.

The proposed project is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Modern engineering practices and compliance with established building standards,

including the California Building Code, would ensure the Project would not cause any significant impacts from unstable geologic units or soils. Impacts are considered less than significant.

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 Impact. Expansive soils experience swelling or shrinking due to moisture change as a result of cyclic wet/dry weather cycles, irrigation, landscaping, or site grading. Swelling and shrinking soils can result in differential movement of structures, including floor slabs and foundations, and site work, including hardscape, utilities, and sidewalks. Soils that exhibit shrinkage and swelling under these conditions generally consist of plastic clay.

Based on depth of the proposed subterranean levels, which would be 15 or 25 feet below the existing ground surface, including foundation depths, the proposed structure would not be prone to the effects of expansive soils.[74] Impacts are considered less than significant.

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

No Impact. The project will be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed project would have no associated impacts.

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

Less Than Significant with Mitigation Incorporated.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and associated parking.

The Natural History Museum conducted a search of their paleontology collection records for the locality and specimen data for the Project Site and does not have any vertebrate fossil localities that lie directly within the project area boundaries, but do have localities nearby from the same sedimentary deposits that occur in the area.[75]

74 Geocon West, Inc. 2020. Geotechnical Investigation: Proposed Multi-Family Residential Development 5001 W. Wilshire Boulevard, 671 S. Highland Avenue & 668 S. Citrus Avenue, Los Angeles, California.

75 Los Angeles County Natural History Museum correspondence, dated April 9, 2021, refer to Appendix E2.

However, construction of the proposed project will include a three-level subterranean parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to paleontological resources could occur. Implementation of **MM-GEO-1** would mitigate any potential significant impacts.

MM-GEO-1: In the event that paleontological resources are unearthed during ground-disturbing activities, 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 PRC § 21083.2.

Compliance with **MM-GEO-1** would reduce impacts to a less than significant level.

8. Greenhouse Gas Emissions

The analysis provided below is primarily based on the Air Quality and Greenhouse Gas Technical Study included as **Appendix B** to this SCEA.

Setting

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer).[76] Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of GHG and other gases to the atmosphere from volcanic eruptions); and

76 US EPA. 2013. Overview of Greenhouse Gases. Available online at: https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed on August 11, 2018.

- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

In recent decades, changes in climate have caused impacts on natural and human systems on all continents and across the oceans. Impacts are due to observed climate change, irrespective of its cause, indicating the sensitivity of natural and human systems to changing climate.[77] Continuing changes to the global climate system and ecosystems, and to California, are projected to include:

- Rapidly diminishing sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures[78];

- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and ice sheets;

- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;

- Changing levels in snowpack, river flow and sea levels indicating that climate change is already affecting California's water resources[79];

- Dry seasons that start earlier and end later, evoking more frequent and intense wildland fires[80]; and

- Increasing demand for electricity due to rising temperatures.[81]

The natural process through which heat is retained in the troposphere[82] is called the "greenhouse effect." Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases, play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's

77 Intergovernmental Panel on Climate Change. 2013. "Climate Change 2013: The Physical Science Basis." Available online at: http://www.climatechange2013.org/. Accessed August 13, 2018.

78 Ibid.

79 California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

80 Ibid.

81 California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

82 The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface from 6- to 7-miles).

atmosphere as shortwave radiation. It travels through the atmosphere without warming it and is absorbed by the Earth's surface. When the Earth re-emits this radiation back toward space, the radiation changes to long wave radiation. GHGs are transparent to incoming short wave solar radiation but absorb outgoing long wave radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

Greenhouse Gas Compounds

California State law defines GHGs to include the following six compounds:

- **Carbon Dioxide** (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems.

- **Methane** (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment.

- **Nitrous Oxide** (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

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

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

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

Regulatory Framework

Federal

Paris Climate Agreement

The Paris Climate Agreement is an international treaty on climate change adopted on December 12, 2015. The goal of the agreement is to limit global warming to 1.5 degrees Celsius as compared to pre-industrial levels. Countries will aim to reach global peaking of GHG emissions as soon as possible to achieve a climate neutral world by mid-century. In order to achieve these reductions, the Paris Climate Agreement works on a 5-year cycle of increasingly ambitious climate action carried out by countries. Therefore, by 2020, countries were required to submit their plans for climate action, known as nationally determined contributions. Additionally, the Agreement provides a framework for financial, technical and capacity building support to those countries who need it. Developed counties will take a lead in providing financial assistance to other countries since large scale investments are required for GHG mitigation and climate adaptation.[83]

The United States joined 190 other countries in the Paris Climate Agreement under the Obama administration in September 2016.[84] Under the Trump administration, the former President announced his intention to withdraw from the Agreement in June 2017 and formally notified the United Nations in November 2019. However, the Agreement requires a year long waiting period before a formal withdrawal will be recognized. As a result, the United States officially withdrew the Agreement in November 2020.[85] However, on January 20, 2021, President Biden accepted and rejoined the Paris Climate Agreement and the U.S. formally rejoined on February 19, 2021.[86][87]

State

Executive Order (EO) S-03-05

83 United Nations. *The Paris Agreement*. Available online at https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement.

84 The White House. *President Obama: The United States Formally Entered the Paris Agreement*. Available online at: https://obamawhitehouse.archives.gov/blog/2016/09/03/president-obama-united-states-formally-enters-paris-agreement.

85 NPR. *U.S. Officially Leaving Paris Climate Agreement*. Available online at: https://www.npr.org/2020/11/03/930312701/u-s-officially-leaving-paris-climate-agreement.

86 The White House. 2021. *Paris Climate Agreement*. Available online at: https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/20/paris-climate-agreement/.

87 The White House. 2021. *The United States Formally Rejoins Paris Agreement*. Available online at: https://www.state.gov/the-united-states-officially-rejoins-the-paris-agreement/.

On June 1, 2005, Executive Order EO S-03-05 was issued by Governor Schwarzenegger in order to set statewide emissions reduction standards. The order required the state to reduce GHG emissions to 1990 levels by 2020 and reduce GHG emissions to 80% below 1990 levels by 2050. EO S-3-05 also calls for the Secretary of California Environmental Protection Agency (Cal/EPA) to be responsible for coordination of state agencies and progress reporting.

Assembly Bill (AB) 32

AB 32 (California Global Warming Solutions Act of 2006) was codified into law in 2006 and codified into law the 2020 GHG emissions targets set by EO S-03-05. AB 32 represents the first enforceable statewide program to limit GHG emissions from all major sectors with penalties for noncompliance.

Senate Bill (SB) 32

SB 32 was signed into law in 2015 and sets into law the mandated reduction targets set in EO B-30-15, which required a reduction in GHG emissions to 40% below the 1990 levels by 2030.

CARB's 2017 Final Scoping Plan

The California Air Resources Board (CARB) in collaboration with over twenty state agencies issued a Final Scoping Plan in 2017 in order to set a framework for the state to meet the overall reduction goals set in SB 32. The 2017 Scoping Plan identified key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water. Through a combination of data synthesis and modeling, CARB determined that the target statewide 2030 emissions limit is 260 $MMTCO_2e$, and that further commitments will need to be made to achieve an additional reduction of 50 $MMTCO_2e$ beyond current policies and programs. Key elements of the 2017 Update include a proposed 20 percent reduction in GHG emissions from refineries and an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal.

Regional

SCAQMD Draft Guidance Regarding Interim CEQA GHG Significance Thresholds

SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. In its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted

the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. The draft tier thresholds recommended by the SCAQMD Working Group were never authorized as guidance for GHG analyses. These recommended thresholds are over a decade old; as a result, these thresholds were not utilized in this analysis.

SCAG 2020 Connect SoCal Plan RTP/SCS

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]).

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whole collaboration can improve the quality of life for Southern Californians. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal CAA requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Less Than Significant Impact. Both construction period and operational period activities would have the potential to generate GHG emissions.

Construction Emissions

The proposed project would generate GHG emissions during temporary, short-term construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the site, asphalt paving, and construction worker motor vehicle trips.

Through the CalEEMod modeling, see **Section IV.3, Air Quality**, proposed project GHG emissions throughout proposed project construction were calculated from off-road equipment usage, hauling vehicles, delivery, and worker trips to and from the site. The total GHG construction emissions over the approximately 2.5-year construction period of the proposed project would be approximately 1,965.3 metric tons on carbon dioxide (MT CO2e). As GHG emissions impact from construction activities would occur over a relatively short time span, it would contribute a relatively small portion of the lifetime GHG emission impact of the proposed project. The total construction GHG emissions were divided by 30 to determine an annual construction emission rate to be amortized over the proposed project's first 30 years of operational life, consistent with CEQA analysis across the state. Amortized over a 30-year period, the proposed project is anticipated to emit approximately 65.5 metric tons of carbon dioxide per year (MT CO2e/year).

Operational Emissions

Operational emissions occur over the life of the Project. The proposed project will construct the 242-unit residential building, 10,900 square feet of commercial space, and parking on the site. The proposed project is expected to generate GHG emissions from area, energy, and mobile-source emissions as the site will generate vehicle trips from residents and employees. Area source emissions are based on the land use sizes, GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHGs emitted. Electricity usage emissions are based on the land uses, default demand factors for the land use, GHG emission factors for the utility provider, and the GWP values of the GHGs emitted. Mobile-source GHG emissions are determined based on the Project's estimated annual VMT, which is calculated in CalEEMod based on the daily trip generation rates estimated through the LADOT's MOU. Waste and water

emissions are derived from the anticipated water usage and wastewater generated based on the Project's proposed land uses and the associated water demand factors.

The estimated total net annual Project emissions, including operation emissions and amortized construction emissions from the proposed project and operational emissions from the existing site, are detailed in **Table IV.8-1, Proposed Project Greenhouse Gas Emissions**.

Table IV.8-1
Proposed Project Greenhouse Gas Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)
Amortized Construction	65.5
Area Sources	54.1
Energy Sources	1,203
Mobile Sources	2,002
Waste Sources	62.0
Water Sources	209
Total Proposed GHG Emissions	**3,595.2**
Total Existing GHG Emissions	**1,651.8**
Net GHG Emissions	**1,943**

Source: Impact Sciences, 2021.

As shown in **Table IV.8-1**, the Project's combined long-term net operational emissions and amortized construction emissions would be approximately 1,943 MT CO2e/year. However, proposed project significance is based on the Project's consistency with statewide and regional policies and plans to meet the state reduction goals set in SB 32, including CARB's 2017 Scoping Plan and SCAG's 2020 Connect SoCal RTP/SCS, see GHG **Impact B**.

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

Less Than Significant Impact. The proposed project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of § 15064.4(b) of the State CEQA Guidelines.

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. Development

projects would be subject to complying with SB 32, and SCAG's Connect SoCal Plan. SB 32 is a statewide reduction goal aimed at reducing emissions to 40% below 1990 levels by 2030. CARB's 2017 Scoping Plan sets a framework for the State to meet the reduction targets of SB 32.

Consistency with the Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reduction strategies necessary to meet SB 32's 2030 reduction goals. **Table IV.8-2, Project Consistency with CARB 2017 Scoping Plan Measures** identifies the Scoping Plan policies that are applicable to the proposed project. As shown, the proposed project would be consistent with the Scoping Plan.

Table IV.8-2
Project Consistency with CARB 2017 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability.	**Not Applicable.** The measure is not related to development projects but intended for energy providers. As such, the policy would not apply.
• 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.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the proposed project is required to meet CALGreen building standards by including measures designed to reduce energy consumption. As such, the policy would not apply but the Project will reduce energy use,
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** The proposed project is required to adhere to the latest CALGreen building Codes and Title 24, which will result in a more efficient project site, such as meeting certain water flow requirements in toilets, showerheads, and faucets as well as lighting standards. As such, the Project will reduce GHG emissions in the electricity sector.
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	**Not Applicable.** This measure is directed towards policymakers, not development projects.
• 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."	However, the proposed project is located 0.25 miles from the Wilshire/La Brea D Line station that is expected to begin operations in 2023. As a result, the proposed project will reduce VMT as a result of locating residents and job opportunities near a major transit line. As such, while this policy would not apply, the Project would place residents and jobs near transit which will reduce VMT.

Table IV.8-2
Project Consistency with CARB 2017 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the proposed project will provide housing and job opportunities near future Wilshire/La Brea D Metro Line station that will encourage transit use. As such, while this policy would not apply, the Project will encourage low GHG transportation.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Not Applicable.** This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts, not development projects. However, the statewide policy goals of 75 percent of solid waste generated be source reduce, recycled, or composted by 2020 under AB 341. Since the project will be operational after this year, the project's waste collection service will be required to be compliant with this waste reduction. As such, while this policy would not apply to the proposed project, it will comply with all regulations.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Not Applicable.** This measure is directed towards policymakers, not development projects. However, the proposed project will be required to adhere to the latest CALGreen Building Standards and Title 24 which will reduce GHG emissions from energy use. Furthermore, the proposed project will be constructed near the future Wilshire/La Brea D Line Metro Station. As such, while this measure does not apply to the proposed project, it will be required to adhere to all building standards that will reduce GHG emissions across multiple sectors.

Source: Impact Sciences, 2021.
CARB. California's 2017 Climate Change Scoping Plan. Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Based on this evaluation, this analysis finds the project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan Update.

Consistency with SCAG's Connect SoCal Plan

At the regional level, SCAG's Connect SoCal Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) represent the region's Climate Action Plan that defines strategies for reducing GHGs. To assess the project's potential to conflict with the RTP/SCS, this section analyzes the project's land use profile for consistency with those in the RTP/SCS. 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 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table IV.8-3, **Project Consistency with SCAG's RTP/SCS** demonstrates the project's consistency with the Strategies set forth in the **Connect SoCal Plan**. The project would also be consistent with the applicable strategies set forth in the RTP/SCS's "A Path to Greater Access, Mobility, & Sustainability" chapter. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in Connect SoCal.

Table IV.8-3
Project Consistency with Connect SoCal Plan

Actions and Strategies	Consistency Analysis
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Consistent:** The proposed project would construct 242 residential units and commercial space near the Wilshire/Highland bus stop for Metro Bus Line 20. In addition, the Metro D Line is currently under construction in order to extend the D Line from Koreatown to West Los Angeles along Wilshire Boulevard. The future Wilshire/La Brea D Line station is approximately 0.25 miles west of the project site and is expected to become operational by 2023.[1] As a result, by project operation, the residents and employees will have access to a major transit stop. Moreover, the proposed project will include on-site secure bicycle parking that will promote active transportation. As such, the location and features of the proposed project will facilitate multimodal transportation.
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Consistent:** The proposed project would construct commercial and residential space that will provide job and housing opportunities approximately 0.25 miles from the future Wilshire/La Brea Metro D line station. As such, the proposed project would reduce commute times by reducing VMT and place both jobs and housing near a major transit stop.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent:** The proposed project would construct commercial and residential space that will provide job and housing opportunities approximately 0.25 miles from the future Wilshire/La Brea Metro D line station. Moreover, the proposed project will include on-site secure bicycle parking that will promote active transportation. As such, the proposed project accomplishes the strategy of placing growth near transit investments and supports first/last mile strategies by including bicycle parking.
Focus Growth Near Destinations & Mobility Options	
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent:** The proposed project would redevelop an existing two-story commercial building to a 242-unit residential project with 10 percent reserved for extremely low-income units and 10,900 square feet of commercial space near a future Metro D Line station As such, the proposed project is redeveloping an outdated retail development and surface parking lot in order to upgrade

Table IV.8-3
Project Consistency with Connect SoCal Plan

Actions and Strategies	Consistency Analysis
	the site into an area that would provide housing and other commercial uses within close proximity of a future major transit station and would be consistent with this strategy.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent:** The proposed project would redevelop an existing two-story commercial building to a 242-unit residential project with 10 percent reserved for extremely low-income units and 10,900 square feet of commercial space near a future Metro D Line station. The proposed project would redevelop an underutilized plot of land that lies within close proximity to the future Metro D line station. The proposed project would provide a multi-family living option with low income units as well as revitalized commercial space in the neighborhood. As such, the proposed project will redevelop underutilized land and increase housing options in the area.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent:** The proposed project would redevelop an existing two-story commercial building to a 242-unit residential project with 10 percent extremely low-income units and 10,900 square feet of commercial space near a future Metro D Line station that will facilitate transit use from residents and employees living or working on the site. As such, the proposed project will reduce the number of solo car trips due to the proximity of a major transit station.
Promote Diverse Housing Crisis	
Preserve and rehabilitate affordable housing and prevent displacement	**Consistent:** The proposed project will redevelop an existing two-story commercial and would not displace any affordable housing units. Instead, the proposed project will construct housing on the project site, including 10 percent extremely low-income residential units. As such, the proposed project will increase the amount of affordable housing.
Identify opportunities for new workforce and affordable housing development	**Consistent:** The proposed project is a mixed-use development with 242 residential uses including 25 affordable residential units. The proposed project will remove a two-story commercial building that provided job opportunities, however, the site will include office and retail space that will allow opportunities for new workers. As such, the site will provide new work and affordable housing options.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedications lanes, charging and parking/drop-off space	**Not Applicable:** This strategy is aimed at local government to promote shared bikes and scooters, electric vehicles, ride sharing and provide safe infrastructure such dedicated lanes, charging and parking/ drop-off space. The proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere with this strategy.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Not Applicable:** This strategy is aimed at local government to identify ways to incorporate “micro-power grids.” The proposed project would not interfere with such policymaking. As such, while the strategy is not

Table IV.8-3 Project Consistency with Connect SoCal Plan	
Actions and Strategies	**Consistency Analysis**
	applicable, the proposed project will not interfere with this strategy.
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions	**Not Applicable:** While this strategy calls on local governments to adopt policies for sustainable infrastructure and development projects, and not individual projects, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere with this strategy.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Not Applicable:** While this strategy calls on the state to adopt policies to new construction near transit corridors and stations, the proposed project would not interfere with such policymaking and would construct a mixed-use development near the future Wilshire/La Brea D Line Metro Station. As such, while the strategy is not applicable, the proposed project will not interfere.
Support cities in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects	**Not Applicable:** While this strategy calls on cities to establish tax incentive or other value capture tools to finance sustainable infrastructure, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Not Applicable:** While this strategy calls on SCAG to work with local jurisdictions to identify ways to implement sustainable strategies, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	**Not Applicable:** While this strategy calls on planning organizations to promote resources and best practices in SCAG, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Continue to support long range planning efforts by local jurisdictions	**Not Applicable:** While this strategy calls on local jurisdictions to support long range planning, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable:** While this strategy calls on local jurisdictions to provide educational opportunities on new tools and practices to promote the Sustainable Communities Strategy, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable:** While this strategy calls on local jurisdictions to support the development of local climate adaptation and hazard mitigation plans, the project would not interfere with this goal. As such, while the strategy is not applicable, the proposed project will not interfere.

Table IV.8-3
Project Consistency with Connect SoCal Plan

Actions and Strategies	Consistency Analysis
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Not Applicable:** While this strategy calls on local governments to adopt policies for renewable energy production, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Integrate local food production into the regional landscape	**Not Applicable:** While this strategy calls on local governments to integrate local food into the regional landscape, the proposed project would not interfere with such policymaking. As such, while the strategy is not applicable, the proposed project will not interfere.
Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent.** The proposed project will be required to adhere to the latest CALGreen Building Codes and Title 24, which will result in a more efficient project site. As such, the proposed project will promote more resource efficient development.
Preserve, enhance and restore regional wildlife connectivity	**Not Applicable:** The proposed project will be constructed in an existing urban setting. The project would not interfere with this goal. As such, while the strategy is not applicable, the proposed project will not interfere.
Reduce consumption of resource areas, including agricultural land	**Consistent**. The proposed project will be constructed in an existing urban setting and, as a result, will not consume any resource areas or agricultural land. As such, the proposed project will not reduce consumption of resource areas.
Identify ways to improve access to public park space	**Not Applicable.** While this strategy calls on local governments to improve access to public park space, the proposed project would not interfere with this goal. As such, while the strategy is not applicable, the proposed project will not interfere.

Source: Impact Sciences, 2021.
SCAG. 2019. Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Chapter 3: A Path to Greater Access, Mobility, & Sustainability. Available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf, accessed October 19, 2020.
[1] Los Angeles Metro. *Purple Line Extension – Section 1. Available online at: https://www.metro.net/projects/purple-section1/.*

Consistency with City of Los Angeles General Plan Air Quality Element

The proposed project would be consistent with the City's General Plan, specifically its Air Quality Element (see **Section IV-3)**. While the Element did not explicitly address control of GHG emissions, global climate change, or resiliency objectives, it did identify several goals to reduce criteria pollutant emissions that would also work to reduce GHG emissions that contribute to climate change, see **Table IV.8-4, Consistency with the Air Quality Element.**

Table IV.8-4
Project Consistency with the Air Quality Element

Goal	Consistency Analysis
Good air quality and mobility in an environment of continued population growth and health economy.	**Consistent:** The proposed project would construct 242 residential units and commercial space near the Wilshire/Highland bus stop for Metro Bus Line 20. In addition, the Metro D Line is currently under construction in order to extend the D Line from Koreatown to West Los Angeles along Wilshire Boulevard. The future Wilshire/La Brea D Line station is approximately 0.25 miles west of the project site and is expected to become operational by 2023.[1] As a result, by project operation, the residents and employees will have access to a major transit stop. Moreover, the proposed project will include on-site secure bicycle parking that will promote active transportation. As such, by placing housing and commercial space near transit and providing opportunities for alternative mobility options, the proposed project will help improve air quality and mobility by reducing the number of gas/diesel-fueled vehicles on the road.
Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**Consistent:** The proposed project would construct 242 residential units and commercial space near the Wilshire/Highland bus stop for Metro Bus Line 20. In addition, the Metro D Line is currently under construction in order to extend public transit service from Koreatown to West Los Angeles along Wilshire Boulevard. The future Wilshire/La Brea D Line station is approximately 0.25 miles west of the project site and is expected to become operational by 2023.[1] As a result, by project operation, the residents and employees will have access to a major transit stop. Moreover, the proposed project will include on-site secure bicycle parking that will promote active transportation. As such, by placing housing and commercial space near transit and providing opportunities for alternative mobility options, the proposed project will help reduce reliance on single-occupant vehicles with fewer commute and non-work trips.
Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.	**Consistent:** The proposed project would minimize congestion impacts in the region because of the Project Site's proximity to public transit. As such, the proposed project would promote alternative modes of transportation and reduce reliance on single-occupancy vehicles.
Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**Consistent.** The proposed project would replace an existing commercial space with an infill project with residential and commercial uses near public transit. The proposed project is consistent with the Element's focus on growing near transit facilities. As such, the proposed project would have minimal impact on existing land use patterns and will place homes and jobs near transit which will reduce air quality emissions through reduced VMT and single occupancy vehicle trips to and from the project site.

Table IV.8-4 Project Consistency with the Air Quality Element	
Goal	**Consistency Analysis**
Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and free parking.	**Consistent.** The proposed project would replace an existing commercial space with an infill project with residential and commercial uses near public transit that will reduce single vehicle trips to and from the project site. Furthermore, the proposed project will be required to be consistent with CalGreen and Title 24 standards. As such, the proposed project will promote energy efficiency through land use and transportation planning.
Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.	**Not Applicable.** The goal is focused on City outreach and public education about personal behavior and its connection to air pollution. The proposed project would not interfere with this goal. As such, while the strategy is not applicable, the proposed project will not interfere.
Source: Impact Sciences 2021. *City of Los Angeles. Air Quality Element*. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.	

Consistency with City of Los Angeles Green New Deal

In 2019, the City of Los Angeles released the Green New Deal as an update to the City's 2015 Sustainable City pLAn (pLan). The City's Green New Deal is an expanded vision of the pLAn and aims to guide the City's transition to a more sustainable future. The Green New Deal sets forth a series of accelerated targets that will reduce GHG emissions. Many of these targets are not applicable at the project level, however, the proposed project will still further the overall goal where applicable, see **Table IV.8-5, Consistency with the City's Green New Deal**.

Table IV.8-5 Project Consistency with the City's Green New Deal	
Targets	**Consistency Analysis**
Supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.	**Not Applicable.** This measure is directed at energy providers to increase the amount of renewable energy created. The proposed project will not interfere with this target. As such, while the strategy is not applicable, the proposed project will not interfere.
Source 70% of our water locally by 2035, and capture 150,000 acre feet per year of stormwater by 2035.	**Not Applicable.** This target is directed at water suppliers to increase the amount of local water provided. The proposed project will not interfere with implementation of this project. Further, the proposed project will convert Carling Way and the northern portion of the existing site into greenspace that will increase the amount of permeable land and increase the potential for stormwater infiltration and groundwater recapture as compared to the existing site. As such, while the strategy is not applicable, the proposed project will not interfere.
Reduce building energy use per square foot for all types of buildings by 22% by 2035; 34% by 2035; and 44% by 2050.	**Consistent:** The proposed project will replace an existing commercial building with the proposed project. The proposed project will be required to adhere to the latest CalGreen and Title 24 requirements that will result in a more efficient building per square foot than the existing

Table IV.8-5
Project Consistency with the City's Green New Deal

Targets	Consistency Analysis
	project. As such, the proposed project will be consistent with this target.
Reduce Vehicle Miles Traveled per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050.	**Consistent.** The proposed project would construct 242 residential units and commercial space near the Wilshire/Highland bus stop for Metro Bus Line 20. In addition, the Metro D Line is currently under construction in order to extend public transit service from Koreatown to West Los Angeles along Wilshire Boulevard. The future Wilshire/La Brea D Line station is approximately 0.25 miles west of the project site and is expected to become operational by 2023.[1] As a result, by project operation, the residents and employees will have access to a major transit stop. Moreover, the proposed project will include on-site secure bicycle parking that will promote active transportation. As such, the proposed project will encourage active and public forms of transportation for residents, visitors, and employees which will reduce the amount of vehicle miles traveled.
Ensure 57% of new housing units are built within 1,500 feet of transit by 2035; and 75% by 2035.	**Consistent.** The proposed project lies adjacent to the Wilshire/Highland bus stop for the Metro Bus Line 20 and lies 0.25 miles (approximately 1,320 feet) from the future Wilshire/La Brea D Line Station that will become operational before the proposed project. As such, the proposed project helps the City meet this target.
Increase the percentage of zero emission vehicles in the city by 25% by 2025; 80% by 2035; and 100% by 2050/	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The proposed project would not interfere with implementation of this target. As such, while the strategy is not applicable, the proposed project will not interfere.
Create 300,000 green jobs by 2035; and 400,000 by 2050	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The proposed project would not interfere with implementation of this target. As such, while the strategy is not applicable, the proposed project will not interfere.
Convert all city fleet vehicles to zero emission where technically feasible by 208.	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The proposed project would not interfere with implementation of this target. As such, while the strategy is not applicable, the proposed project will not interfere.
Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.	**Not Applicable.** This target is directed at the City of Los Angeles, not individual project. The proposed project would not interfere with implementation of this target. As such, while the strategy is not applicable, the proposed project will not interfere.

Source: *Impact Sciences, 2021.*
City of Los Angeles. 2019. L.A.'s Green New Deal. Available online at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

Conclusion

The proposed project will replace an existing commercial development that hosts dental offices, fast-food restaurants, a dry cleaner, and other commercial businesses with a mixed-use development that includes 242 new dwelling units, designating 10 percent of the total number of units for Extremely Low Income tenants, and 10,900 square feet of commercial space. The proposed project is adjacent to the existing Wilshire/Highland bus station and approximately 0.25 miles away from the future Metro Wilshire/La Brea D Line (formerly Purple) Line Station. The D Line is expected to open the new section from Koreatown to Miracle Mile, which includes the Wilshire/La Brea station, in 2023 when the proposed project is still under construction. As a result, future residents and employees at the proposed project site will have access to a major transit stop which will promote transit use and reduce the vehicle trips to and from the project site. Additionally, the proposed project will include on-site bicycle parking to further promote other forms of transportation. Furthermore, the proposed project will be constructed consistent with CALGreen Building Code and Title 24 which will reduce on-site GHG emissions from area and energy sources. For these reasons, the proposed project would have a less than significant impact regarding GHG emissions.

9. Hazards and Hazardous Materials

This section is in part based on the following reports, included as **Appendix F** of this SCEA.

- **Limited Phase I and II Environmental Site Assessment Report**, 5001 Wilshire Boulevard, Los Angeles, CA 90036, conducted by Waterstone Environmental, Inc.
- **Phase I Environmental Assessment Report**, 0.164 Acre Parking Lot Located at 5055 Wilshire Boulevard, Los Angeles, CA 90036, conducted by Waterstone Environmental, Inc.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Less Than Significant Impact. The project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. A search using the California Department of Toxic Substances Control's data management system

indicated that there are no records of the site having been used for storage of hazardous materials.[88]

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

Less Than Significant Impact. The Limited Phase I Environmental Site Assessment determined that there was a historic gasoline station that operated at the site from approximately the 1940's through the 1960's and the dispensers were located along the southwestern portion of the property parallel to Wilshire Boulevard. It was also determined from the City Directories that a historic dry cleaner operated on the site from approximately 1990 through at least 2015, but is no longer present.

The area is also identified as being in a potential methane zone as a result of its close proximity to nearby oilfields and the La Brea Tar Pits which is a known area of methane concern from these petroleum sources.

A search using the California Department of Toxic Substances Control's Envirostor indicated that there are no open cases within the Project Site.[89] The Environmental Site Assessment Reports conducted by Waterstone Environmental, Inc. did not indicate that there are any underground storage tanks on the Project Site. Furthermore, the project does not involve hazardous materials. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous materials.

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

No Impact. The closest schools are the John Burroughs Middle School and Los Angeles High School, which are approximately 500 feet (0.09 miles) and 2,570 feet (0.49 miles) away, respectively. John Burroughs Middle School is within one-quarter mile from the project. However, the project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste; Therefore, the proposed project would have no hazardous material related impacts to schools.

88 California Department of Toxic Substances Control. Envirostor. Available online at: https://www.envirostor.dtsc.ca.gov/public/.

89 California Department of Toxic Substances Control. Envirostor. Available online at: https://www.envirostor.dtsc.ca.gov/public/

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

Less Than Significant Impact. The Limited Phase I ESA conducted by Waterstone determined that there was a historic gasoline station that operated at the site from approximately the 1940's through the 1960's and the dispensers were located along the southwestern portion of the property parallel to Wilshire Boulevard. It was also determined from the City Directories that a dry cleaner operated on the site from approximately 1990 through at least 2015, but is no longer present.

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.[90]

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.[91]

Therefore, the site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, therefore, would not create a significant hazard to the public or environment. Impacts are considered less than significant.

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

No Impact. A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. Santa Monica Airport is approximately 6.5 miles southwest of the Project Site. The Project Site not located in the vicinity of a private airstrip. Therefore, no impact would occur.

90 California Department of Toxic Substances Control. Envirostor. Available online at: https://www.envirostor.dtsc.ca.gov/public/

91 California State Water Resources Control Board. GeoTracker. Available online at: https://geotracker.waterboards.ca.gov/

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Neither the construction nor operation of the proposed project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the proposed project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan, and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the proposed project.

In addition, the Applicant will submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Therefore, demolition, construction and operation of the proposed project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the proposed project would have a less than significant impact with respect to interference with an adopted emergency response or evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project Site is not located within a designated Very High Fire Hazard Severity Zone or Fire Brush Clearance Zone.[92] In addition, the project site is surrounded by urban development and not adjacent to any wildlands. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the project would have no associated impacts.

92 City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA. Available online at: https://navigatela.lacity.org/navigatela/, accessed February 22, 2021.

10. Hydrology And Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

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

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

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

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

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a Standard

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

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from the Metropolitan Water District (MWD) (49 percent; Bay Delta 41 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (38 percent), local groundwater (11 percent), and recycled water (2 percent).[93] Based on the City's most current Urban Water Management Plan, in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet per year.[94] Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.[95] The Project Site is currently developed with a commercial building and associated parking and thus does not afford any opportunity for groundwater recharge activities.

93 Los Angeles Department of Water and Power. Facts and Figures – Water Supply Sources (5-year average) – Fiscal Year 2015-2019. Available online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=t6q7wu6ee_4&_afrLoop=1023653675697584

94 Los Angeles Department of Water and Power. Urban Water Management Plan. 2015. Available online at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf

95 Los Angeles Department of Water and Power. Urban Water Management Plan. 2015. Available online at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf

The Project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the Project Site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. The Project would also include an 18,000 square foot green belt, which would allow for groundwater recharge activities.

Therefore, the proposed project's potential impacts relating to a decrease in, or interference with groundwater supplies would be less than significant.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:

i. result in substantial erosion or siltation on-or off-site?

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

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

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction the proposed project. Further, the project would be required to implement an LID Plan (during the project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

ii. result in flooding on-or off-site?

Less Than Significant Impact\. The Project Site is currently developed with commercial and parking uses and the proposed project would not substantially change the site's drainage patterns and would not alter a discernable drainage course resulting in flooding. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site.

Since the project would not involve alteration of a discernable watercourse and post-development runoff discharge rates are required to not exceed predevelopment rates, the proposed project would not have the potential to alter drainage patterns or increase runoff such that flooding would occur. Therefore, impacts would be less than significant.

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 Impact. The project site is generally flat and is currently occupied by an existing commercial building and parking lots. Project implementation would result in similar drainage patterns as existing conditions. Furthermore, as noted above, an 18,000 square foot green belt would be added to the northern portion of the site, decreasing the overall impervious surface since that area is currently a paved parking lot. Furthermore, the Project would include areas with permeable pavement, allowing for water infiltration. As such, the amount of stormwater runoff from the site is not expected to increase beyond current levels, and the project is, therefore, not expected to exceed the capacity of existing or planned stormwater drainage systems.

During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. When properly designed and implemented, these "good-housekeeping" practices of approving a LID plan and SWPPP are expected to reduce short-term construction-related impacts to a less than significant level.

Furthermore, the project's operation would comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB, and the proposed project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the proposed project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level.

iv. impede or redirect flood flows?

Less Than Significant Impact. The drainage of surface water from the project would be controlled by building regulations and would be directed towards the City's existing streets, storm drains, and catch basins. As discussed above, the proposed project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff. LID is a stormwater management strategy that seeks to mitigate the impacts of increases in runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration, and use of stormwater. These LID practices can effectively remove nutrients, bacteria, and metals from stormwater while reducing the volume and intensity of stormwater flows.[96] The LID ordinance requires rainwater from a three-quarter inch rainstorm to be captured, infiltrated and/or used onsite at most developments and redevelopments where more than 500 square feet of hardscape is added.[97] As such, the Project would not impede or redirect flood flows and impacts are considered less than significant.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No impact. The Project Site is not located within a coastal area, and no water bodies are on or adjacent to the project area that would impact future projects due to a seiche. The Project Site is not within a tsunami hazard area as mapped by the California Department of Conservation.[98] The site is within an area of minimal flooding (Zone X) as defined by the Federal Emergency Management Agency.[99] Therefore, the impacts from of the release of pollutants due to inundation are considered less than significant.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above, the proposed project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the

96 LA Sanitation. About LID. Available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-lid/s-lsh-wwd-wp-lid-al?_adf.ctrl-state=1ctki2y16y_5&_afrLoop=13168358763091974#!

97 LA Sanitation. Low Impact Development 2 Sided Brochure. Available at: https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017123.pdf

98 California Department of Conservation. Tsunami Inundation Map. Available online at: https://www.conservation.ca.gov/cgs/tsunami/maps

99 Los Angeles County Department of Public Works. Flood Zone Determination Website. Available online at: https://pw.lacounty.gov/floodzone/

NPDES and City discharge requirements would ensure that the construction of the proposed project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

Therefore, the Project would comply with applicable water quality control plans. Additionally, the project site would be constructed on a site previously developed and would not substantially increase the amount of impervious surface. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of any other water quality control plans or sustainable groundwater management plans. Impacts are less than significant.

11. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

a. Physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community.

The project would not physically divide an existing community, as the site is surrounded by residential development to the north of the project site and existing commercial space to the south, east, and west. The project will be built on a site that already includes a commercial development and would infill the areas of the site that are currently surface lots and an existing ROW. Therefore, the site is surrounded by similar development on all sides. No impact would result.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in Sequoyah, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the General Plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also Greenebaum v. City of Los Angeles (1984) 153 Cal.App.3d 391, 406; San Franciscans Upholding the Downtown Plan, supra, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (Friends of Lagoon Valley).

The following is a list of applicable land use plans, policies, and regulations:

- City of Los Angeles General Plan
- Wilshire Community Plan
- ZI-2452 Transit Priority Area in the City of Los Angeles
- Los Angeles Municipal Code
- Historic Preservation Overlay Zone (HPOZ) (See Section IV-5, Cultural Resources)

City of Los Angeles General Plan

The City's General Plan is a dynamic document consisting of 11 elements, including 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural

Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.[100]

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan Area. **Table IV.11-1, Wilshire Community Plan Consistency Analysis**, shows applicable Objectives within the Wilshire Community Plan and the proposed project's consistency.

Table IV.11-1
Wilshire Community Plan Consistency Analysis

Objective and Policies	Discussion
Residential	
Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.	**Consistent.** The proposed project would include the development of up to 242 dwelling units with 10 percent of the units restricted to Extremely Low Income households. A variety of bedroom types would be included for the project, such as studio, one-bedroom, two-bedroom, and three-bedroom units. As such, the proposed project would be consistent with this objective.
Objective 1-2: Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	**Consistent.** The Project includes development of 242 multi-family residential dwelling units and commercial uses, which is in proximity to several transit lines and a planned Metro D (formerly Purple) Line station. The Project Site is within a designated Transit Priority Area. As such, the proposed project would be consistent with this objective.
Objective 1-3: Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	**Not Applicable.** The Project Site does not contain existing residential uses. As such, the objective is not applicable.
Objective 1-4: Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.	**Consistent.** The proposed project will set aside 10 percent of the residential units for Extremely Low Income households. As such, the proposed project would be consistent with this objective.
Commercial	
Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	**Consistent.** The proposed project would include approximately 10,900 square feet of commercial retail space. The Project Site's three parcels are zoned C4–2D, [Q]C2-1, and [Q]C2-1-HPOZ and would comply with allowable uses. As such, the proposed project would be consistent with this objective.
Objective 2-3: Enhance the visual appearance and appeal of commercial districts.	**Consistent.** The proposed project aims to create a pedestrian-scaled project at the street level. The building incorporates clean lines, and multifaceted materials including veneer tile, metal cladding, cementitious siding,

100 City of Los Angeles. *General Plan Overview*. Available online at: https://planning.lacity.org/plans-policies/general-plan-overview.

	metal railings and a plaster finish. This alternate design in textures, colors, and materials add visual interest while avoiding dull and repetitive facades. As such, the proposed project would be consistent with this objective.

Source: Impact Sciences, March 2021, and City of Los Angeles. 2001. Wilshire Community Plan. Available online at: https://planning.lacity.org/odocument/3333424a-21b9-4f7b-86db-064926b9dcb9/Wilshire_Community_Plan.pdf.

The site contains three parcels that are zoned C4 –2D, [Q]C2-1, and [Q]C2-1-HPOZ with a land use designation of Community Commercial. The "[Q]" condition for the two northern parcels limits the C-2 zoned portion of the Project Site to parking or residential development. The Project Site is limited by the "D" Development Limitation pursuant to Ordinance No. 165,331 (Subarea No. 2085), which limits the FAR to 3 to 1. The proposed project is a residential development and would not conflict with the zoning designations. As shown above in **Table IV.11-1**, the proposed project would be consistent with relevant goals and policies in the Wilshire Community Plan. Furthermore, the Project Site is located within a Transit Priority Area within the City of Los Angeles and would comply with applicable regulations. Transit Priority Areas are identified under Zoning Information File No. 2452 as an area within one half mile of a major transit stop that is existing or planned.[101] Construction is currently underway for a three phased extension of the Metro D Line (formerly Purple Line) along Wilshire Boulevard from the Wilshire/Western Metro Station to the Westwood community of Los Angeles.[102] The project site would be located within 0.29 mile of a planned Metro stop at Wilshire Boulevard and La Brea Avenue, which is expected to open in 2023.

Zoning Conformance

Use

The Project is located within the C4-2D, [Q]C2-1 and [Q]C2-1-HPOZ zones, which allows for residential development, commercial and parking uses. The [Q]C2-1 and [Q]C2-1-HPOZ zones are subject to "Q" Condition associated with Subarea 944 of Ordinance No. 174,483 of the Wilshire Community Plan Update, which came into effect on May 5, 2002. While Subarea 944 is located within a commercial zone and land use designation, the "Q" Condition limits development

101 Section 21064.3 of the Public resources code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). City of Los Angeles Department of City Planning, ZI No. 2452, https://pdf4pro.com/view/city-of-los-angeles-department-of-city-planning-zoning-44bd27.html.

102 Metro D (formerly Purple) Line Extension Transit Project, LA Metro, https://www.metro.net/projects/westside/.

to parking lots or residential development. The Project will construct a new mixed-use building with commercial uses and residential condominium units as well as accessory uses such as parking and common open space.

Pursuant to LAMC Section 12.32 H, the Applicant is requesting a clarification that while Subarea 944 "Q" Condition restricts residential development to the R1 density (1 dwelling unit per 5,000 square feet of lot area), it does not restrict residential development to R1 uses. Thus, accessory uses to multi-family residential development, including open space, are permitted uses within Subarea 944. As such, impacts would be less than significant.

Housing Development

The Building Area, or floor area of construction as defined by the California Buildings Code, consists of approximately 446,110 square feet. Broken down by use, the non-residential floor are includes of approximately 26,570 square feet and the residential floor area includes approximately 419,540 square feet. As a result, the Project is approximately 6% non-residential and 94% residential, which makes the Project an Eligible Housing Development Project pursuant to Gov Code Section 65589.5(h)(2)(B) and subject to the Housing Crisis Act of 2019 (State Bill "SB" 330).

Pursuant to SB 330, the Applicant submitted a Preliminary Application to the Department of City Planning, Case No. PAR-2021-662-VHCA. The Preliminary Application was deemed complete on March 23, 2021. As such, impacts would be less than significant.

Density

The allowable density for the C4-zoned area is 1 dwelling unit per 400 square feet of lot area. With approximately 55,567 square feet of net lot area in the C4 zone, the base density is 139 dwelling units. The allowable density for the [Q]C2-zoned area is 1 dwelling unit per 5,000 square feet of lot area (consistent with the R1 zone). With approximately 17,830 square feet of net lot area in the [Q]C2 zone, the base density is 4 dwelling units. Combined, the total base density across the Project Site is 143 dwelling units.

The Project proposes to restrict 10% of the total density as restricted affordable at the Extremely Low-Income level, which qualifies the Project for the Base incentive, pursuant to TOC Guidelines Section VI, to increase the density up to 70%, or 244 dwelling units. The Project includes 242 dwelling units. As such, impacts would be less than significant.

Floor Area

The Project Site is located in the C4-2D, [Q]C2-1 and [Q]C2-1-HPOZ zones and height districts. The C4 zone is a general commercial zone that permits commercial uses (with some restrictions) and multi-family housing units. Height District 2D indicates that the Project Site is in Height District 2, which typically allows a maximum permitted Floor Area Ratio ("FAR") of 6 to 1, or six times the buildable area of the Project Site. However, the Project Site is limited by the "D" Development Limitation pursuant to Ordinance No. 165,331 (Subarea No. 2085), which limits the FAR to 3 to 1.

The 55,567 square feet of lot area in Height District 2D yields a total permitted floor area of 166,701 square feet. The 17,830 square feet in Height District 1 yields a total permitted floor area of 26,745 square feet. The combined floor area permitted by-right across the Project Site would be 193,446 square feet, which equates to an FAR of 2.64 to 1.

The Project would provide 10% of the units for Extremely Low Income households, which qualifies the Project for the Base incentive, pursuant to TOC Guidelines Section VI, to increase the FAR in the Height District 2D by 50% and to increase the FAR in Height District 1 to 3.75 to 1. With the TOC Incentive, the total permitted floor area averaged across the Project Site is 316,914 square feet, or an FAR of 3.84 to 1.

Broken down by use, the commercial floor area includes approximately 10,900 square feet and the residential floor area includes approximately 270,650 square feet. The Project also includes an approximate 500 square-foot paseo on the ground floor that connects the sidewalk on Wilshire Boulevard to the ground floor parking area. Overall, the Project includes approximately 282,050 square feet of floor area, or an FAR of 3.84 to 1. As such, impacts would be less than significant.

Height

The Project Site is located in the C4-2D, [Q]C2-1 and [Q]C2-1-HPOZ zones and height districts. Generally, commercial zones in Height Districts 1 and 2 have no story or height limitations. Although the Project Site is subject to a "D" Limitation and a "Q" Condition, neither qualifiers address height. Thus, there are no story or height limitations across the Project Site based on the underlying zoning.

The Project Site is limited by Transitional Height regulations pursuant to LAMC Section 12.21.1 A.10, which limits the height of buildings developed in commercial zones based on proximity to single-family residential zones, such as the R1 zone, the RE9 zone and the R1R3 zone that are

located to the north and east of the Project Site. These transitional height regulations prescribe that within 0 – 49 feet from a single-family zone the height is limited to 25 feet, within 50 – 99 feet from single-family the height is limited to 33 feet and within 100 – 199 feet from single-family, height is limited to 61 feet.

The Project Site is located within 50 feet of the R1 and R1R3 zones, thus the Project Site would be limited to 25 feet in height for a portion of the Project Site. However, TOC Guidelines allows the Project height limit to be stepped-back at a 45-degree angle as measured from a horizontal plane originating 25 feet above grade at the property line of the adjoining lot in the single-family zones.

The Project will achieve up to 105 feet in height. Although the Project technically includes 8 stories, the ground floor will appear double-height from the exterior. This “double-height” ground floor will allow for desirable ground floor commercial space and eight townhome units.

LAMC Section 12.03 defines a Commercial Corner as any commercial or multi-family residentially used “corner lot located in a C zone in Height District Nos. 1, 1-L, 1-VL or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to, or is located across the street from, any portion of a lot zoned RW1 or more restrictive zone.” Although the building will be developed on the C4 portion of the Project Site, which is located in Height District 2 and thus not subject to commercial corner, the Project Site includes lots in the C2-1 zone that adjoin the single-family zones to the north.

Despite the above, the Project is still exempt from commercial corner regulations pursuant to LAMC Section 12.22 A.23(d)(1) because the Project is a mixed-use building consistent with the definition provided in LAMC Section 13.09. As such, impacts would be less than significant.

Yards and Setbacks

The Project Site is rectangular in shape and has three street frontages. The Project would merge all the lots and Carling Way together to create one site and to resubdivide the site into two ground lots. Lot 1 will primarily be located in the C4-2D zone, although a small portion of the proposed lot will extend across the centerline of existing Carling Way into the C2-1 zones. Lot 1 will be improved with the proposed mixed-use building and is designed to contain all accessory uses required by the building. Lot 2 will be located entirely in the C2-1 zones and contain open space in excess of what is required. No buildings are proposed on Lot 2 or within the C2-1 zones. As a result, no setbacks are analyzed in this area.

Based on the proposed subdivision design, the shortest street frontages for both Lots 1 and 2 will be along South Citrus Avenue and South Highland Avenue. Thus, pursuant to LAMC Section 12.03 and the definition of front yard, the Project Site will be comprised of two through lots with front yards oriented toward South Citrus Avenue and South Highland Avenue. The side yards will be oriented toward the north and south lot lines. The Applicant also requests the Advisory Agency designate both Lot 1 and Lot 2 as through lots with front yards on South Citrus Avenue and South Highland Avenue.

The eight-story building is proposed entirely within the C4 zone. Pursuant to LAMC Section 12.16 C.1, no front yards are required in the C4 zone. Pursuant to LAMC Section 12.22 C.1, where a Building Line has been established by ordinance, the space between such Building or Setback Line and the front or side lot line may be used as the front or side yard, as the case may be, in lieu of the front or side yard required by this article. The Project Site is subject to a 5-foot Building Line on Wilshire Boulevard (Ordinance No. 59,577) and is therefore required to provide a 5-foot setback on Wilshire Boulevard. Pursuant to LAMC Section 12.16 C.1, side yards are required to be provided at the first level of residential uses in the C4 zone consistent with R4 regulations, or a minimum of 5 feet and an additional foot for every story over 2 stories. An eight-story building with ground floor residential would be required to provide an 11-foot side yard setback at the ground level.

The Project includes 0-foot setbacks on Citrus Avenue and on Highland Avenue. The Project respects the 5-foot building line on Wilshire Boulevard. The Project provides an approximate 36'-2" side yard setback from the proposed lot line in accordance to the subdivision request for VTT-83358. The building footprint would be located a minimum of 60 feet from the northern property line of the Project Site. As such, impacts would be less than significant.

Open Space and Landscaping

According to LAMC Section 12.21 G, the Project is required to provide a minimum of 100 square feet of open space per unit with less than 3 habitable rooms, 125 square feet of open space per unit with three habitable rooms and 175 square feet of open space per unit with more than three habitable rooms. According to the LAMC definition of habitable rooms, a kitchen is not considered a habitable room for open space purposes. The Project would construct 179 units with less than three habitable rooms and 62 units with three habitable rooms and one unit with more than three habitable rooms, yielding an open space requirement of 25,825 square feet.

The Project will provide at least 26,350 square feet of common open space including indoor and outdoor recreation areas exclusive to residents of the Project and their guests, as well as ground level open space element, the Green Belt, which will be available to both residents and the general public (with hour restrictions). Private balconies are also included in the Project design to allow for an indoor/outdoor experience within 117 units. As such, impacts would be less than significant.

Vehicle Parking

LAMC Section 12.21 A.4(a) requires at least one parking space for each dwelling unit of less than three habitable rooms, one and one-half parking spaces for each dwelling unit of three habitable rooms, and two parking spaces for each dwelling unit of more than three habitable rooms. The Project is 66 studio units, 113 one-bedroom units, and 62 two-bedroom units and one three-bedroom unit, which would result in an overall residential parking requirement of 362 parking spaces.

However, the Project qualifies for a parking reduction in accordance with base incentives in the TOC Guidelines, which reduces the minimum residential parking requirement to 0.5 vehicle parking spaces per unit. The Project includes 242 units, which equates to 151 required residential parking spaces. The Project will provide 324 residential parking spaces, which is the equivalent of 1.34 parking spaces per dwelling unit. The residential parking will be provided in a three-story subterranean parking structure.

Pursuant to the TOC Guidelines, the Project is eligible for a 30% non-residential parking reduction. After the parking reduction, 30 non-residential parking spaces are required and 30 non-residential parking spaces are proposed. As such, impacts would be less than significant.

Bicycle Parking

Bicycle parking is required pursuant to LAMC Section 12.21 A.16(a). The Project consists of 242 dwelling units, thus a total of 143 long-term and 21 short-term residential bicycle parking stalls are required. The Project would provide all 143 required long-term residential stalls within an enclosed room on the ground floor and 21 short-term residential stalls near the residential access oriented toward the Green Belt and on the sidewalk around the Project Site in various locations.

Non-residential bicycle parking is required at one space per every 2,000 square feet of floor area, with a minimum of two long-term spaces and two-short term spaces for each proposed use. The Project consists of 10,900 square feet of combined non-residential floor area. In total, the Project is required to provide seven short-term and seven long-term bicycle parking spaces and will

provide seven short-term and seven long-term stalls. The short-term bicycle parking would be located on the sidewalk around the Project Site in various locations. As such, impacts would be less than significant.

Based on the above information, the Project would be consistent with applicable plans, policies, regulations, and impacts would be less than significant.

12. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project is located on a well-developed, built out section of the Wilshire Community Area at the intersection of Wilshire Boulevard and South Highland Avenue within a commercial zone. The Conservation Element of the LA General Plan notes that the State Mining and Reclamation Act (SMARA) ensures against premature loss of minerals and protects sites threatened by development practices which might preclude future mineral extraction.[103] The Project site has not been utilized for mineral extraction and is not located within an oil drilling district, state-designated oil filed or surface mining district, and there are no active mining operations on the project site or near the project vicinity. The Project site is not within a Mineral Resource Zone (MRZ-2) - areas where adequate information indicates that significant mineral

[103] City of Los Angeles *General Plan*, "Conservation Element" (2001), *Mineral Resources Exhibit A*, January 2001. Available online at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

deposits are present, or where it is judged that a high likelihood exists for their presence.[104] Therefore, the project will not result in an impact.

b. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. As stated above, the proposed development is not located within an MRZ-2 Area. The Project Site is not identified as an important mineral resource recovery site on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

13. Noise

The following information is from the Noise and Vibration Technical Assessment which describes the existing noise and vibration environment of the proposed mixed-use development project at 5001 Wilshire Boulevard, 671-677 South Highland Avenue, and 668 South Citrus Avenue, included as **Appendix G** to this SCEA.

Fundamentals of Noise and Vibration

Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies. For example, the human ear is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dB(A), is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dB(A) increase in noise level. Typically, changes in a community noise level of less than 3 dB(A) are not noticed by the human ear.[105] Changes from 3 to 5 dB(A) may be noticed by some individuals who are sensitive to changes in noise. A greater than 5 dB(A) increase is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound.

[104] California Department of Conservation (2001); ESRI Streetmap USA (2008); Alta Planning + Design (2011).
[105] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.

On the A-weighted scale, the range of human hearing extends from approximately 3 to 140 dB(A). **Table IV.13-1, A-Weighted Decibel Scale**, provides examples of A-weighted noise levels from common sources. Noise sources occur in two forms: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large number of point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dB(A) at acoustically "soft" sites.[106] For example, if a noise source produces a noise level of 89 dB(A) at a reference distance of 50 feet, the noise level would be 83 dB(A) at a distance of 100 feet from the noise source, 77 dB(A) at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dB(A) over hard surfaces and 4.5 dB(A) over soft surfaces for each doubling of distance.

Table IV.13-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dB(A), Leq)
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.

Sound levels also can be attenuated by man-made or natural barriers (e.g., sound walls, berms, ridges), as well as elevational differences. Noise is most audible when traveling by direct line-of-sight, an interrupted visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver, can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dB(A) or more. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

106 Federal Highway Administration, *Highway Noise Fundamentals*, (1980) 97. Examples of "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft, sand, plowed farmland, grass, crops, heavy ground cover, etc.

Solid walls and berms may reduce noise levels by 5 to 10 dB(A) depending on their height and distance relative to the noise source and the noise receptor.[107] Sound levels may also be attenuated 3 dB(A) by a first row of houses and 1.5 dB(A) for each additional row of houses.[108]

Sound Rating Scales

Various rating scales approximate the human subjective assessment to the "loudness" or "noisiness" of a sound. Noise metrics have been developed to account for additional parameters, such as duration and cumulative effect of multiple events. Noise metrics are categorized as single event metrics and cumulative metrics, as summarized below.

In order to simplify the measurement and computation of sound loudness levels, frequency weighted networks have obtained wide acceptance. The A-weighted scale, discussed above, has become the most prominent of these scales and is widely used in community noise analysis. Its advantages are that it has shown good correlation with community response and is easily measured. The metrics used in this analysis are all based upon the dB(A) scale.

Equivalent Noise Level[109]

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the "acoustic energy" average noise level during the period of the sample. It is based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dB(A). Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24 hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1 hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

[107] Federal Highway Administration, *Highway Noise Mitigation*, (1980) 18.

[108] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol,* 2013.

[109] Federal Highway Administration. Construction Noise Handbook: 2.0 Terminology. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook02.cfm

Community Noise Equivalent Level[110]

Community Noise Equivalent Level (CNEL) is a 24-hour, time-weighted energy average noise level based on the A-weighted decibel. It is a measure of the overall noise experienced during an entire day. The term "time-weighted" refers to the penalties attached to noise events occurring during certain sensitive periods. In the CNEL scale, 5 dB are added to measured noise levels occurring between the hours of 7:00 P.M. and 10:00 P.M. For measured noise levels occurring between the hours of 10:00 P.M. and 7:00 A.M., 10 dB are added. These decibel adjustments are an attempt to account for the higher sensitivity to noise in the evening and nighttime hours and the expected lower ambient noise levels during these periods. Existing and projected future traffic noise levels in this section use the CNEL scale.

Day-Night Average Noise Level[111]

The day-night average sound level (Ldn) is another average noise level over a 24-hour period. Noise levels occurring between the hours of 10:00 P.M. and 7:00 A.M. are increased by 10 dB. This noise is weighted to take into account the decrease in community background noise of 10 dB(A) during this period. Noise levels measured using the Ldn scale are typically similar to CNEL measurements.

Adverse Effects of Noise Exposure[112]

Noise is known to have several adverse effects on humans, which has led to laws and standards being set to protect public health and safety, and to ensure compatibility between land uses and activities. Adverse effects of noise on people include hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts on people is briefly discussed in the following narrative.

Hearing Loss

Hearing loss is generally not a community noise concern, even near a major airport or a major freeway. The potential for noise-induced hearing loss is more commonly associated with occupational noise exposures in heavy industry, very noisy work environments with long-term exposure, or certain very loud recreational activities (e.g., target shooting and motorcycle or car

110 Ibid.

111 Ibid.

112 Federal Highway Administration. Construction Noise Handbook: 3.0 Effects of Construction Noise. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook03.cfm

racing). The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dB(A) for 8 hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud enough to cause hearing loss.

Communication Interference

Communication interference is one of the primary concerns in environmental noise. Communication interference includes speech disturbance and intrusion with activities such as watching television. Noise can also interfere with communications such as within school classrooms. Normal conversational speech is in the range of 60 to 65 dB(A) and any noise in this range or louder may interfere with speech.

Sleep Interference

Noise can make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and cause awakening. Noise may even cause awakening that a person may or may not be able to recall.

Physiological Responses

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, and other physical changes. Studies to determine whether exposure to high noise levels can adversely affect human health have concluded that, while a relationship between noise and health effects seems plausible, there is no empirical evidence of the relationship.

Annoyance

Annoyance is an individual characteristic and can vary widely from person to person. Noise that one person considers tolerable can be unbearable to another of equal hearing capability. The level of annoyance depends both on the characteristics of the noise (including loudness, frequency, time, and duration), and how much activity interference (such as speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that 2% to 10% of the population is highly susceptible to annoyance from any noise not of their own making, while approximately 20% are unaffected by noise.[113] Attitudes may also be affected

[113] Wayne County Airport Authority. *Background information on noise & its measurement, 2009.*

by the relationship between the person affected and the source of noise, and whether attempts have been made to abate the noise.

Vibration

Vibration consists of waves transmitted through solid material. Groundborne vibration propagates from a source through the ground to adjacent buildings by surface waves. Vibration may comprise a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating and is measured in hertz (Hz). Most environmental vibrations consist of a composite, or "spectrum" of many frequencies, and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than one Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak particle velocity (PPV) in inches per second (in/sec) when considering impacts on buildings or other structures, as PPV represents the maximum instantaneous peak of vibration that can stress buildings. Because it is a representation of acute vibration, PPV is often used to measure the temporary impacts of short-term construction activities that could instantaneously damage built structures. Vibration is often also measured by the Root Mean Squared (RMS) because it best correlates with human perception and response. Specifically, RMS represents "smoothed" vibration levels over an extended period of time and is often used to gauge the long-term chronic impact of a project's operation on the adjacent environment. RMS amplitude is the average of a signal's squared amplitude. It is most commonly measured in decibel notation (VdB).

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High frequency vibrations reduce much more rapidly than low frequencies, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss (i.e., the foundation of the structure does not move in sync with the ground vibration), but the vibration can also be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows or items on shelves, or the motion of building surfaces. At high levels, vibration can result in damage to structures.

Manmade groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic induces perceptible vibration in buildings, such as

window rattling or shaking of small loose items (typically caused by heavy trucks in passing), then it is most likely an effect of low-frequency airborne noise or ground characteristics. Human annoyance by vibration is related to the number and duration of events. The more events or the greater the duration, the more annoying it will be to humans.

Construction vibration damage criteria are assessed based on structural category (e.g. reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[114] The FTA Guidelines include a table showing the vibration damage criteria based on structural category and is presented below in **Table IV.13-2, Construction Vibration Damage Criteria.**

Table IV.13-2
Construction Vibration Damage Criteria

Building/Structural Category	PPV, in/sec
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. September 2018.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. Noise-sensitive receptors surrounding the project site include residential dwellings to the north, adjacent to the project site; More residential units to the northeast across Highland Avenue;

[114] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

John Burroughs Middle School to the east approximately 500 feet from the project site; residential uses approximately 250 feet south of the Project Site; Mansfield Avenue Park to the west across South Citrus Avenue; and more residential uses to the northwest across South Citrus Avenue.

Existing Conditions

A noise monitoring survey was completed to establish existing noise levels in the vicinity of the project site. Transportation noise is the main source of noise in urban environments, largely from the operation of internal combustion engines and frictional contact between vehicles and ground and air.[115] It should be noted that due to the ongoing Coronavirus pandemic, traffic conditions are likely lower than usual. Therefore, noise measurements that were conducted in February 2021 are likely lower than pre-pandemic conditions and therefore conservative measurements for the existing noise environment. **Figure IV.13-1, Noise Monitoring Locations** maps the noise measurement locations relative to the project site. The existing average daily noise levels are presented in **Table IV.13-3, Ambient Sound-Level Readings.**

Table IV.13-3
Ambient Sound-Level Readings

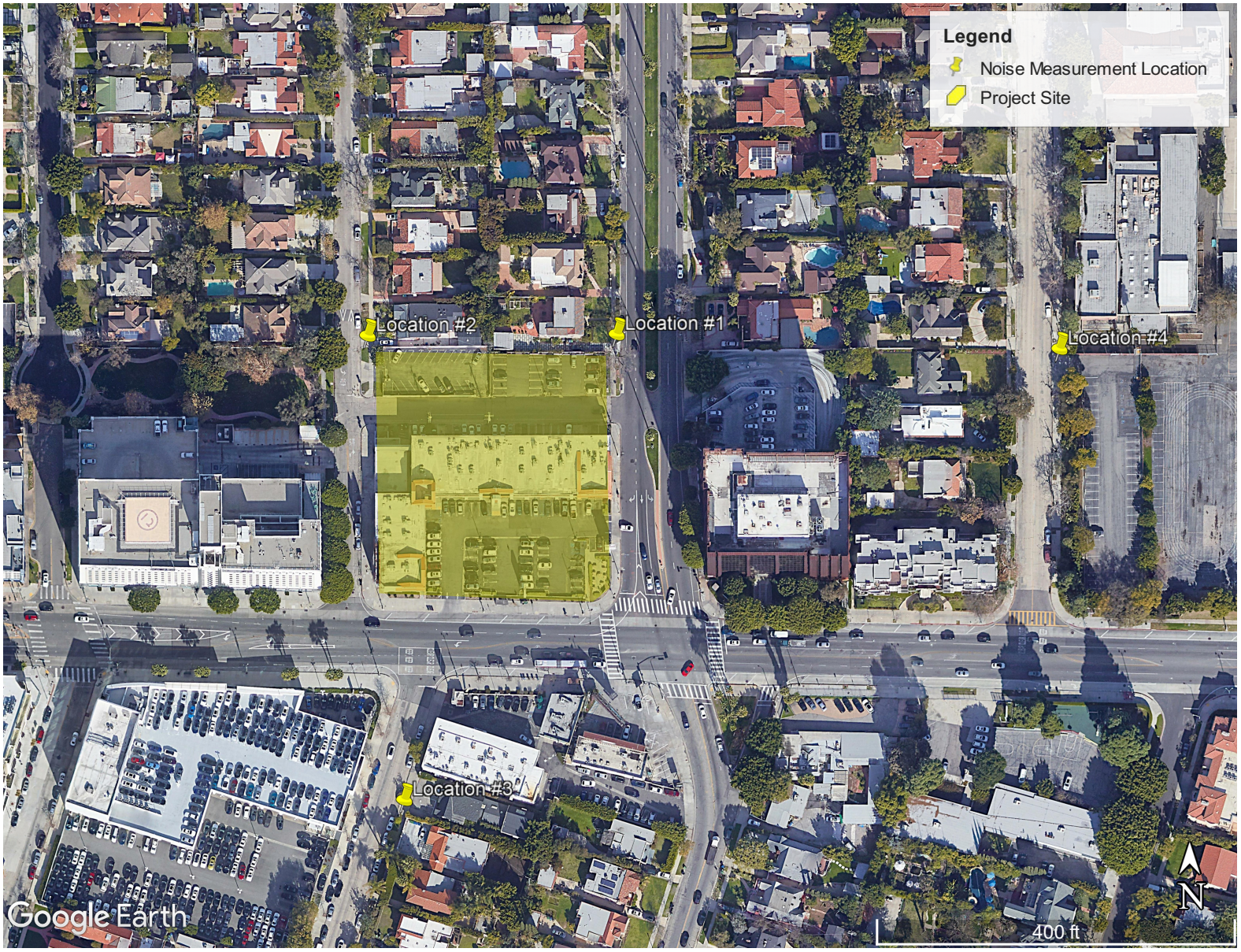
Modeled Noise Measurement Location #	Street Address	dBA Leq
Location #1	665 S. Highland Ave (Residence)	68.7
Location #2	664 S. Citrus Ave (Residence)	56.7
Location #3	716 S. Citrus Ave (Residence)	59.6
Location #4	600 S. McCadden Place (John Burroughs Middle School)	59.9

Source: Impact Sciences, 2021.

The only sources of groundborne vibration in the project site vicinity are heavy-duty vehicles (e.g., refuse trucks, delivery trucks, and school buses) traveling on local roadways. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road.[116] In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

115 World Health Organization. *Noise Sources and Their Measurements*. Available online at: https://www.who.int/docstore/peh/noise/Comnoise-2.pdf, accessed July 2, 2020.

116 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.



SOURCE: Google Earth, 2021

Figure IV.13-1

IMPACT SCIENCES

Noise Monitoring Locations

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation Incorporated.

Construction Impacts

Temporary On-Site Construction Activity Noise

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-site activities could include the use of heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Off-site secondary noises could be generated by sources such as construction worker vehicles, vendor deliveries, and haul trucks.

Noises from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty,

diesel-powered earthmoving equipment. The types of heavy equipment required for these activities may include excavators, bulldozers, front-end loaders, graders, backhoes, and scrapers.

For this Project, demolition and grading noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively to demolish and grade for the Project. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA. Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and demolished materials, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The impacts of other construction equipment and vehicles would be neither as loud nor as extensive over the duration of the Project's demolition, grading, and other phases. Therefore, this analysis examines a worst-case-scenario; the noise impacts of all other construction equipment and phases would not exceed the impacts analyzed here. The projected noise impact from excavators and front-end loaders are shown in **Table IV.13-4, Construction Noise Impacts at Off-Site Sensitive Receptors – Unmitigated** and summarized below.

Table IV.13-4
Construction Noise Impacts at Off-Site Sensitive Receptors - Unmitigated

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
Location #1 – Residences at 665 S. Highland Ave	73.0	68.7	74.4	5.7	Yes
Location #2 – Residences at 664 S. Citrus Ave	73.0	56.7	73.1	16.4	Yes
Location #3 – Residences at 716 S. Citrus Ave	59.0	59.6	62.3	2.7	No
Location #4 – John Burroughs Middle School	50.0	59.9	60.3	0.4	No

Source: Impact Sciences, 2021.

These estimated construction noise levels would exceed the City's significance threshold of 5 dBA. The LAMC Section 112.05 limits construction noise to 75 decibels at 50 feet of distance when you are within 500 feet of a residential zone. During project construction the project will comply with LAMC 112.05 which will ensure noise levels do not exceed 75 decibels at 50 feet of distance. However, the project would still increase noise levels above the City's 5dBA threshold.

As such, **Mitigation Measure NOI-1 and NOI-2** are necessary to reduce construction noise to a below the 5 dBA threshold and to a level of less than significant.

Mitigation Measure NOI-2 would require the use of sound barriers capable of achieving attenuation of at least 15 dBA along the Project's northern and western boundaries. The analysis assumes a "worst case" condition where the construction equipment is located at the property line nearest to the sensitive receptors. In this condition, the noise would need to be reduced by 15 dBA. However, in practice, construction equipment will be in different places during different phases of the construction and actual sound levels will vary. For each doubling of distance construction equipment is located away from the property line to a receptor (i.e. going from a distance of 15 to 30 feet), noise attenuates by 6 dBA. Therefore, actual noise levels would be lower as the construction equipment moves further from the property line. Nonetheless, the **Mitigation Measure NOI-2** still requires a performance standard of 15 dBA reduction in noise at 15 feet of distance from the sensitive receptor to ensure noise levels do not exceed 5 dBA above measured ambient noise levels.

Mitigation Measures:

MM-NOI-1: During the construction phase along the northern property line, the project shall employ construction control measures to reduce increases in ambient noise at the closest receptors by a minimum of 1 decibel Leq. Examples of employable measures include use of mufflers, sound barriers and reducing activity levels of construction of equipment. This specification shall be included on all construction documents to ensure compliance.

MM-NOI-2: During the construction phase along the northern property line, the project shall employ construction control measures to reduce increases in ambient noise at the closest receptors by a minimum of 12 decibels Leq. Examples of employable measures include use of mufflers, sound barriers and reducing activity levels of construction of equipment. This specification shall be included on all construction documents to ensure compliance.

As shown in **Table IV.13-5, Construction Impacts at Off-Site Sensitive Receptors (with Mitigation)**, implementation of Mitigation Measures NOI-1 and NOI-2 would reduce noise exposure of sensitive receptors to below the 5 dBA threshold. As a result, construction noise impacts would be considered less than significant with mitigation.

Table IV.13-5
Construction Noise Impacts at Off-Site Sensitive Receptors (with Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
Location #1 – Residences at 665 S. Highland Ave	58.0	68.7	69.1	0.4	No
Location #2 – Residences at 664 S. Citrus Ave	58.0	56.7	60.4	3.7	No
Location #3 – Residences at 716 S. Citrus Ave	56.0	59.6	61.2	1.6	No
Location #4 – John Burroughs Middle School	47.0	59.9	60.1	0.2	No

Source: Impact Sciences, 2021.

Temporary Off-Site Construction Activity Noise

Construction haul trucks would generate noise off-site during site demolition and would peak during grading. This would include removal of materials from the project site, base materials, and demolished materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 3 dBA or greater at any noise sensitive land use. A 3 dBA increase in sound level pressure is barely detectable by the human ear.[117] 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.[118] While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.

The proposed haul truck route would have arriving trucks exit the I-10 freeway and head north on Crenshaw Boulevard then turn west onto Wilshire Boulevard to arrive at the project site. Exiting trucks would head west on Wilshire Boulevard then south on La Brea Avenue to the I-10 freeway.

Average daily traffic (ADT) counts from the City of Los Angeles Department of Transportation were used to estimate the existing traffic at the intersection of Wilshire Boulevard and South

[117] Federal Highway Administration. Noise Fundamentals. Available at: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm

[118] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013.

Highland Avenue. Traffic counts indicate average daily traffic at the intersection of Wilshire Boulevard and South Highland Avenue are 42,203 daily vehicle trips.[119]

The grading phase for project construction would average approximately 142 haul truck trips per day. Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.[120] Therefore, 142 haul truck trips would account for approximately 2,712 PCE trips per day during the grading phase. This would account for approximately 6.43 percent of the average daily traffic that passes through the intersection of Wilshire Boulevard and South Highland Avenue. Since it would take a doubling (i.e. a 100 percent increase) of roadway traffic volume to increase noise levels by 3 dBA[121], the addition of haul trucks from the project would not increase traffic to levels capable of producing 3 dBA ambient noise increases.

Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let along augment their traffic to levels capable of producing 5 dBA ambient noise increases. As a result, off-site construction noise impacts related to haul trips would be considered less than significant.

Operational Impacts

Permanent Operational Traffic Noise

As discussed above, 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.[122] A 3 dBA noise level increase is the minimum noise level increase required for a human to perceive a change in ambient noise.

[119] City of Los Angeles Department of Transportation. December 2013. 24 Hours Traffic Volume: Highland Av N/O Wilshire Bl. Available at: https://navigatela.lacity.org/dot/traffic_data/automatic_counts/HIGHLAND.WILSHIRE.131217.N-AUTO.pdf, accessed March 24, 2021.

[120] Caltrans, Technical Noise Supplement Table 3-3, 2013.

[121] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013

[122] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013

Traffic volumes in the project area were obtained from the Los Angeles Department of Transportation traffic count information.[123] Trip generation information for the proposed project was added to average daily traffic volumes for Wilshire Boulevard at the intersection of Highland Avenue to determine whether traffic increased enough to result in an audible noise level increase. The DOT Traffic Count shows that the intersection of Wilshire Boulevard and South Highland Avenue has a daily traffic volume of approximately 42,203 vehicles.[124] The Project's estimated 1,547 daily vehicle trips would account for approximately 3.67 percent of the average daily traffic volume at this intersection which lies immediately to the southeast of the project site. This volume is not nearly the doubling of traffic volume required for a 3 dBA increase in noise.[125] This increase in traffic volumes compared to current traffic counts is not significant enough to cause an audible increase in traffic noise and impacts would be less than significant.

Permanent Operational Stationary Noise

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems which typically generate noise levels of approximately 60 dBA Leq at 50 feet[126], on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL to or within their respective L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" noise categories, or by 5 dBA or greater overall.

The proposed project includes open balconies on the third through eighth and fifth floors, where socializing could occur. These outdoor spaces represent gathering places for outdoor activities that are private. There would be intermittent outdoor 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

123 City of Los Angeles Department of Transportation. December 2013. 24 Hours Traffic Volume: Highland Av N/O Wilshire Bl. Available at: https://navigatela.lacity.org/dot/traffic_data/automatic_counts/HIGHLAND.WILSHIRE.131217.N-AUTO.pdf, accessed March 24, 2021.

124 Ibid.

125 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013

126 City of Los Angeles. West Adams New Community Plan Draft EIR. Available at: https://planning.lacity.org/eir/WestAdams/DEIR/4.12%20Noise.pdf

noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.[127] Even assuming a worst-case scenario, where up to 67 dBA of human noise is generated over an ambient noise level as low as 59.6 dBA Leq at an open balcony (existing ambient noise levels at Noise Monitoring Location #3 – Residence at 716 South Citrus Avenue), human conversations from balcony activities could generate about a 0.3 dBA Leq increase at the nearest sensitive receptors at 716 South Citrus Avenue. Because the threshold of audibility for humans is 3 dBA, this impact would be inaudible and far below the City's thresholds of significance for operational noise impacts. Any attenuation from solid railing, roof edges, and safety barriers around these open balconies would further mitigate any noise transmission. If activities were to occur during the evening from 7:00 P.M. to 10:00 P.M., any CNEL adjustment of 5 dBA to account for human sensitivities would result in a 1.0 dBA Leq increase in ambient noise levels at the nearest receptor. If any outdoor activities were to occur after 10:00 P.M., a CNEL adjustment of 10 dBA would to 10:00 P.M., any CNEL adjustment of 5 dBA to account for human sensitivities would result in a 2.5 dBA Leq increase in ambient noise levels at the nearest receptor, an impact that is inaudible and below the City's thresholds of significance.

Parking noise typically generates noise levels of approximately 60 dBA at 50 feet. However, parking from the project would occur in a three-level underground structure. Noises from the Project's underground parking level would be inaudible, or at the very least considerably attenuated[128], at nearby receptors. Impacts would be less than significant.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The Federal Transit Administration provides ground-born vibration impact criteria with respect to building damage during construction activities. PPV, expressed in inches per second, is used to measure building vibration damage. Construction vibration damage criteria are assessed based on structural category (e.g. reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[129]

[127] Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

[128] California Department of Transportation. 2013. Technical Noise Supplement, Table 7-1. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

[129] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

Groundborne vibration generated by construction activities associated with the proposed project would affect sensitive uses located in close proximity to the project site. **Table IV.13-6, Vibration Levels at Off-Site Sensitive Uses from Project Construction** shows the estimated vibration velocities for nearby sensitive receptors.

Table IV.13-6
Vibration Levels at Off-Site Sensitive Uses from Project Construction

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Receptor Significance Threshold PPV (in/sec)	Estimated PPV (in/sec)
Location #1 – Residences at 665 S. Highland Ave	15	0.2	0.191
Location #2 – Residences at 664 S. Citrus Ave	15	0.2	0.191
Location #3 – Residences at 716 S. Citrus Ave	250	0.2	0.003
Location #4 – John Burroughs Middle School	500	0.2	0.001

Source: Impact Sciences, Inc. 2021

The vibration velocities predicted to occur at the nearest receptors located 15 feet from the nearest project site boundary would be 0.191 in/sec PPV. All receptors are considered to be a non-engineered timber or masonry building and would not experience a PPV groundborne vibration level that exceed the FTA 0.2 in/sec PPV threshold. Therefore, vibration impacts associated with building damage due to construction activities would result in a less than significant impact. No mitigation is required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not in the vicinity of a private airstrip or airport land use plan. Likewise, the project site is not located within an airport land use plan or within two miles of a public airport or public use airport. As such, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. No impact would occur from the proposed project and no further analysis is required.

14. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 road or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

The Project Site is located in SCAG's City of Los Angeles Jurisdiction for growth forecasting. The most recent U.S. Census Bureau population estimates indicated a 2019 population of 3,979,576 for the City of Los Angeles.[130] According to SCAG's Connect SoCal 2020 RTP/SCS, the City of Los Angeles is expected to increase in population to 4,771,300 by the year 2045.[131] The average persons per household for the City of Los Angeles is 2.80 persons per household.[132] The proposed project would include 242 multi-family units for an estimated population of approximately 680 residents.

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 242 housing units. As such, 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 and would be in line with the planned increases in population for the City of Los Angeles.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population projections for the City of Los Angeles. Therefore, the Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any residents or housing, and would have no related impacts.

130 U.S. Census Bureau. 2021. Quickfacts. Available online at: https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,CA/PST045219

131 Southern California Association of Governments (SCAG). April 2020. Demographics and Growth Forecast Technical Report. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

132 U.S. Census Bureau. 2021. Quickfacts. Available at: https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia,CA/PST045219

15. Public Services

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i)	Fire protection?	☐	☐	☒	☐
ii)	Police protection?	☐	☐	☒	☐
iii)	Schools?	☐	☐	☒	☐
iv)	Parks?	☐	☐	☒	☐
v)	Other public facilities (Libraries)?	☐	☐	☒	☐

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire Protection?

Less Than Significant Impact. Consistent with the ruling of *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, § 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. A development project would have a significant impact on fire protection if it requires a new or expanded fire station to maintain service and that new or expanded facility resulted in adverse physical effects.

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services in the event of an emergency. This is due to

construction activities which may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

That noted, to comply with California Department of Industrial Relations (Cal-OSHA) and State and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[133] This is to lessen reliance and not deplete resources from the local fire department. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and State regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, would be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General “good housekeeping” procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Traffic Management Plan (CTMP), which includes traffic management strategies for Project construction. Compliance with CTMPs is typically included as conditions of approval prior

[133] California Department of Industrial Relations, Subchapter 4, Article 36: Fire and Protection Measures, https://www.dir.ca.gov/title8/1920.html.

to issuance of construction permits for the approved project. The CTMP would outline and dictate how construction operations would be carried out and would identify specific actions to reduce effects on the surrounding community. The CTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity. In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. It is acknowledged that, even with the CTMP, the Project could incrementally increase traffic, which could potentially delay emergency response times. However, the Project's potential impacts are minimal given these other factors that influence emergency response time (alarm transfer, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics).

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, impacts on fire protection services associated with construction of the Project would be less than significant.

Operation

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (Plan Check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

Response Distance

LAFD’s ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion along the response route. Section 57.09.07 of the LAMC requires land uses to include the installation of an automatic fire-sprinkler system should the type

of land use exceed 1.5 miles.[134] The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. The site location is served by LAFD Fire Station 61, located at 5821 West Third Street, about one mile from the Project Site.[135] Therefore, this Project meets the standards outlined in LAMC Section 57.09.07.

Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the incorporation of fire sprinklers and other fire protection systems within the proposed building, Project impacts related to response distance would be less than significant.

Emergency Access

The LAFD would review Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. The Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Conclusion

Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines §s 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this

134 LAMC Section 57.09.07

135 Los Angeles Fire Department. Find My Station. Available online at: https://www.lafd.org/fire-stations/station-results, accessed on March 25, 2021.

document. Thus, the Project impacts on fire protection and emergency medical services would be less than significant.

ii. Police protection?

Less Than Significant Impact. The Project Site is served by the Los Angeles Police Department (LAPD) District 738 of the Wilshire Division[136], which services the Greater Wilshire and Hancock Park communities.[137] The station is located at 4861 West Venice Boulevard, about two miles from the proposed development.

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security could include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
- Construction impacts are temporary in nature and do not cause lasting effects; and
- Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding

136 Los Angeles ZIMAS. Available online at: http://zimas.lacity.org/, accessed March 25, 2021.

137 Los Angeles Police Department. Wilshire Community Police Station. Available online at: https://www.lapdonline.org/wilshire_community_police_station.

traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The Project would include security features such as appropriate lighting in and around the proposed office building and controlled access to the subterranean parking garage. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. These measures would be to offset the increase in residents, employees and potential patrons as a result of the Project. In addition, the lighting and landscaping design would ensure high visibility. The provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Project impacts related to police protection services would be less than significant.

Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

iii. Schools?

Less Than Significant Impact. The Project Site is served by the Los Angeles Unified School District (LAUSD). A significant impact could occur if a project includes substantial employment or

population growth that could generate a demand for school facilities which would exceed the capacity of LAUSD. Whether a project results in a significant impact on public schools is made with the following considerations:

1. Population increases resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area;

2. Demand for school services anticipated at the time of project completion and occupancy compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;

3. Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s); and

4. Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by one elementary school, one middle school, and one high school that is part of the LAUSD system.[138] 3rd Street Elementary is located at 201 S June Street, less than a mile from the Project Site. John Burroughs Middle School is located at 600 S McCadden Place about a third of a mile away, and Fairfax Senior High School is located at 7850 Melrose Avenue approximately three miles away from the Project Site. All three schools are within a 10-minute drive to the Project site. This Project consists of 242 residential apartment units with 306 bedrooms, which as noted in Section 14 – Population and Housing – would translate to a population estimate of 680 people based on City of Los Angeles average of 2.80 persons per multi-family unit. 179 of those units would consist of studio and one-bedroom apartments, while 63 units would be two or more bedrooms. Taking into consideration the possibility of children living in a two bedroom or larger apartment, the potential increase of students for the area would be about 63 students. Given that the Project site is equally represented by one elementary, one middle school, and one high school, the potential impacts would be less than significant to school facilities.

[138] Resident School Identifier, Los Angeles Unified School District. Available online at: https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed on March 25, 2021.

Pursuant to the California Government Code § 65995[139], the Project Applicant would be required to pay school fees established by LAUSD, payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

iv. Parks?

Less Than Significant Impact. A Project could result in a significant impact on local parks if the population increase as a result of the development disproportionally increases or reduces the demand for recreation and park services. However, this Project Site is served by several public parks and would not create a significant impact.

The Project is located approximately a half mile from the nearest Los Angeles City park, La High Memorial Park.[140] It is also located about a mile from Harold A. Henry Park, both of which are located southeast of the Project Site and consist of open fields and children's playgrounds. There is a senior activity center with a swimming pool approximately one mile northwest of the Site off West Pico Boulevard. There is also a recreation center with a swimming pool approximately one mile south of the Project Site.

The population of the Hancock Park neighborhood is 10,671, according to estimates by the Los Angeles Department of City Planning.[141] The proposed project is expected to generate at 680 residents based on 242 residential units[142], and may result in a proportional increase in the use of local community parks.

The demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. The Los Angeles Citywide General Plan Framework Final EIR[143] identifies the City's standard long-range (minimum) ratios for parks to population. According to Section 2.14, Recreation and Open Space, of the Framework's Final EIR, the City's standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks and two acres per

[139] also known as SB 50 – the Leroy F. Greene School Facilities Act of 1998

[140] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator, accessed on March 30, 2021.

[141] Hancock Park. Los Angeles Times. Mapping Central L.A. Available online at: http://maps.latimes.com/neighborhoods/neighborhood/hancock-park/

[142] Project Plans indicate the residential building would have 306 bedrooms.

[143] City of Los Angeles, Los Angeles Citywide General Plan Framework Final EIR, June 1996.

1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks. LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents[144], with an exception made for affordable housing units. These fees are used to fund land acquisition and capital improvements. This Project is not requesting a zoning change and is a use allowed within this community. Therefore, the Project would not lead to substantial physical deterioration of any recreational facilities, and would have no related significant impacts.

The Public Recreation Plan, part of the Service Systems Element of the Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City including Local Recreation Standards.[145] The standard ratio of neighborhood and community parks to population is two acres per 1,000 residents within a 1- to 2-mile radius for neighborhood and community parks. The Project site is located within an urbanized area of the Wilshire community. There are six parks and recreational facilities within a 5-mile radius of the Project.[146] It is estimated that development of the Project would result in an increase of at least 680 residents, which could increase the activity and frequency of use of these facilities. The Project includes on-site open space amenities intended to serve the recreational needs of on-site residents, including outdoor open space, podium courtyard, a swimming pool, and a roof deck. However, it assumed the future residents of the Project site would utilize recreation and park facilities in the surrounding area and generate additional demand for such amenities. Based on the standard parkland ratio goal of two acres per 1,000 residents, the Project would generate a need for approximately one and a half acre of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents,[147] with an exception made for affordable housing units. The Project would provide on-site open space

144 Board Report No. 17-120. Board of Recreation and Park Commissioners. Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

145 Public Recreation Plan. Services Systems Element of the LA General Plan,. Available online at: https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf.

146 City of Los Angeles Department of Recreation and Parks. Facility Map Locator. Available online at: https://www.laparks.org/maplocator, accessed March 30, 2021.

147 Board Report No. 17-120. Board of Recreation and Park Commissioners. Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

and be compliant with LAMC Section 12.33 in paying the requisite fees for new housing development. Therefore, impacts related to parks and recreational facilities would be less than significant.

v. Other public facilities?

Libraries

Less Than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth whose demand would exceed the capacity available to serve the Project site.

Library facilities within two miles of a Project site are generally considered to be within the service area of a Project, and the nearest Los Angeles Public Library (LAPL) is the Memorial Branch Library, which is about a mile away from the Project site. The Project would introduce new residents to the site.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[148]

Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, electronic media, computers, and other library materials. Therefore, impacts to library facilities would be less than significant.

[148] Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed August 23, 2021.

16. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☒	☐

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. The project is located approximately half a mile from the nearest Los Angeles city park, La High Memorial Park.[149] La High Park consists of a small field and child's play lot. Harold A. Henry Park, located less than a mile from the Project Site, also consists of a child's play lot. Both La High and Harold Henry Parks are located southeast of the Project Site, situated about a third of a mile from each other. There is also a senior citizen[150] center consisting of a community room, kitchen, auditorium, gym, computer lab, and dining hall located northwest of the Project Site, and an aquatic center located one mile southeast from the Project Site.

The Project would lead to a population increase of 680 people, and it proposes green space for its residents to extend behind the Project Site through Carling Way and to a vacant parcel north of the Site. The proposed green space would go over an existing asphalt parking lot and would provide 18,000 square feet of open space. Moreover, the Applicant is proposing a 10,000 square foot courtyard and 2,000 square feet for a roof deck, for a total of 30,000 square feet of open

[149] City of Los Angeles Department of Recreation and Parks. Facility Map Locator. Available online at: https://www.laparks.org/maplocator, accessed February 2021.

[150] City of Los Angeles. Pan Pacific Senior Activity Center. Available online at: https://www.laparks.org/scc/pan-pacific-activity.

space.[151] The Project also proposes 3,400 square feet of indoor amenities for recreational use. Therefore, the Project allows ample opportunity for onsite residents to enjoy outdoor recreation and facilities, and impacts to local parks would be less than significant.

LAMC Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents[152], with an exception made for affordable housing units. These fees are used to fund land acquisition and capital improvements. Given the number of available parks and recreation centers located near the Project Site, the dedication of land for open recreation space, and the requisite park fees, the development itself would not lead to substantial physical deterioration of existing recreational facilities. Therefore, this project would have no related significant impacts.

b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project includes private recreational facilities for the residents of the Project, including an outdoor green space, a 10,000 square foot courtyard inclusive of a pool, 2,000 square foot roof deck, and approximately 3,400 square feet of indoor amenities. The indoor amenities would be within the footprint of the project site and would not expand into public space nor affect available facilities. Therefore, the impacts to the environment would be less than significant.

17. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

151 Site Plans, Plot Data Plan, A-1.3

152 Board Report No. 17-120, Board of Recreation and Park Commissioners, Approved May 17, 2017. Available online at: https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A project could result in a significant impact if it adversely affects an existing community plan, transportation ordinance or policy addressing transit and pedestrian facilities. This purpose of this Project is to revitalize an existing retail corridor and provide much needed housing, including affordable housing, in a centrally located community near rapid transit. In accordance with a transportation assessment memorandum of understanding (MOU) with the City of Los Angeles Department of Transportation (LADOT) and supplemental traffic analysis, this Project would not conflict with any existing plans and facilities. In fact, its design and proximity to a future metro stop would be beneficial for residents and commuters. Refer to **Appendix H** of this SCEA.

The Wilshire Community Plan identifies traffic congestion and inadequate transportation linkage between residential and commercial facilities.[153] To help address these issues, the Wilshire Community Plan Transportation Improvement and Mitigation Program (TIMP), identifies measures to mitigate some impacts of new developments on the transportation system, primarily through measures funded by traditional transportation revenue sources.[154] Moreover, the Community Plan state implementation of local area-specific traffic mitigation measures are required for major projects to be completed in the Wilshire Plan Area.

A TIMP was prepared for the Wilshire Community Plan Area that analyzes land use impacts on transportation and was incorporated with the Wilshire Community Plan as part of the Environmental Impact Report to analyze the environmental impacts of the Wilshire Community Plan. The Wilshire Community Plan TIMP establishes a program of specific measures to reduce land use impacts on transportation to be undertaken during the life of the Wilshire Community

153 Wilshire Community Plan. City of Los Angeles. Available online at: https://planning.lacity.org/odocument/3333424a-21b9-4f7b-86db-064926b9dcb9/Wilshire_Community_Plan.pdf.

154 *Id. at I-8.*

Plan. It also takes into account and incorporates the local, state and regional programs including the Los Angeles County Congestion Management Program (CMP); the Long Range Plan prepared by the Los Angeles County Metropolitan Transportation Authority (LACMTA); the Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments (SCAG); and the Statewide Transportation Improvement Program (STIP) prepared by the California Department of Transportation (CALTRANS). LADOT also implements pedestrian-oriented arterials, bikeways, and transit-priority streets. The Wilshire Community Plan TIMP provides an implementation program for the circulation needs of the Wilshire Community Plan Area including transit improvements transportation demand management strategies, transportation systems management strategies and capital improvements. In particular, the Wilshire Community Plan TIMP has goals and policies which include:

- Objective 10-2: Increase work trips and non-work trips made on public transit
    - Goal 12: Encourage alternative modes of transportation to reduce single-occupancy vehicular trips
    - Goal 15: Provide a sufficient supply of well-designed and convenient off-street parking lots and facilities throughout the plan area
- Objective 16-2: Ensure that the location, intensity, timing of development is consistent with the provision of adequate transportation infrastructure

The Project Site centrally located within the Wilshire Community Plan Area and is designated as a Transit Priority Area in the City of Los Angeles.[155] Transit Priority Areas are identified under Zoning Information File No. 2452 as an area within one half mile of a major transit stop that is existing or planned.[156] Construction is currently underway for a three phased extension of the D Line along Wilshire Boulevard from Wilshire/Western Metro Station to the Westwood community of Los Angeles.[157] The project site would be located within 0.29 mile of a planned Metro Station at the intersection of Wilshire Boulevard and La Brea Avenue, which is expected to open in 2023.

155 ZIMAS. LA City. Available online: http://zimas.lacity.org/, accessed March 1, 2021.

156 Section 21064.3 of the PRC (PRC) defines a “major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of § 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (City) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). City of Los Angeles Department of City Planning. ZI No. 2452. Available online: https://pdf4pro.com/view/city-of-los-angeles-department-of-city-planning-zoning-44bd27.html.

157 Metro D Line (Purple) Extension Transit Project. LA Metro. Available online at: https://www.metro.net/projects/westside/.

The Project seeks to utilize existing mass transit access as well as benefit from the future D Line extension stop at the intersection Wilshire Boulevard and Western Avenue as part of the Section I opening expected to operate in 2023. When constructed, the Wilshire/ Western Metro Station would provide rapid transit from the eastern edge of Beverly Hills to Los Angeles Union Station.[158]

Currently, several major bus lines serve the project site[159], providing connections to the Wilshire/Western Metro Station approximately 1.80 miles away. The Wilshire/Western Metro Station is serviced by the Metro D (formerly Purple) Line subway. The D Line is a centrally located subway line that begins/ends at the Wilshire/Western stop and travels east/west through Koreatown and terminates/begins at L.A. Union Station.[160]

The Project also proposes a three-level subterranean parking garage to accommodate parking for residents and shoppers. This Project therefore would not complicate existing parking issues along Wilshire Boulevard, and the proposed parking garage meets Goal 15 of the Wilshire Community Plan TIMP in providing a sufficient supply of well-designed and convenient off-street parking facilities.

As outlined in the analysis above, this Project meets the goals and policies of the Wilshire Community Plan and the Wilshire Community Plan TIMP. The purpose of this Project is to provide much needed housing near a transit stop; therefore, impacts would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project exceeding the Los Angeles Department of Transportation's (LADOT) recommended level of service. CEQA Guidelines § 15064.3(b) outlines the criteria for analyzing transportation impacts. § 15064.3(b)(1) – Land Use Projects - states that Vehicle Miles Traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. In 2019, the City of Los Angeles - pursuant to SB 743 and the recent changes to § 15064.3

158 Ibid.

159 The major bus lines include the 720 and 20 servicing east/west service along Wilshire Boulevard. Bus & Rail System Overview – Maps & Timetables, July 2017. Available online: http://media.metro.net/riding_metro/maps/images/4_17-3071_BLT_BusRailOverview.pdf.

160 Metro and Regional Rail Map. Available online: https://media.metro.net/documents/90e3378c-e786-4cc7-8f4b-88fc15a4b3b3.pdf/, accessed March 1, 2021.

of the State's CEQA Guidelines - adopted VMT as the applicable criteria for determining transportation impacts under CEQA.[161] The current LADOT TAG provide instructions on preparing transportation assessments for land use proposal and defines the significant impact thresholds. The LADOT VMT Calculator tool measures project impacts in terms of Household VMT per Capita and Work VMT per Employee. DOT identified distinct thresholds for significant VMT impacts (which is 15% below APC criteria) for each of the seven Area Planning Commission (APC) areas in the City. This Project is located in the Central APC area, which following the following thresholds:

- Daily Household VMT per Capita: 6.0
- Daily Work VMT per Employee: 7.6

Currently, LADOT estimates 1,318 daily vehicle trips to the Project Site, with 7,965 vehicle miles traveled (VMT) daily. (See **Appendix H, Memorandum of Understanding**) CEQA analysis would be triggered by the threshold set by the City of Los Angeles, at which added VMT from a project would require environmental mitigation. A memorandum of understanding between the Applicant and the City's Department of Public Works that acknowledges the Transportation Assessment for the proposed Project would be prepared in accordance with LADOT's Transportation Assessment Guidelines was prepared in anticipation of the Project on December 7, 2020. The City's threshold for Daily VMT at Tier 2 is 250 trips. This Project would increase the level of service to the Project Site to 1,547 daily trips and 9,410 daily VMT. [162] This would equate to a net increase of 229 daily trips and 1,445 daily VMT, both of which fall below levels of significance for Tier 2 criteria. Moreover, the Applicant is proposing 10,900 square feet of commercial space, which is below the threshold of 50,000 square feet. Therefore, given the projections of net daily trips, it was found this Project would not exceed thresholds and therefore not necessitate further VMT analysis.

The proposed project is not projected to have Household nor Work VMT per Capita of exceeding the thresholds 15% below APC (6.0 per household and 7.6 for work)[163]; therefore, this Project would not have a significant VMT impact on the Site nor the environment.

161 City of Los Angeles Transportation Assessment Guidelines. Chapter 2. CEQA Analysis of Transportation Impacts. July 2019.

162 Transportation Assessment Memorandum of Understanding. 5001 Wilshire Boulevard Mixed-Used Project. December 7, 2020.

163 City of Los Angeles VMT Calculator Version 1.3, generated December 4, 2020.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact could occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. Some existing driveways on the Project site would be modified to enable access and egress for both the residential and commercial space; however, the Project would not include any change in intersection or roadway design. Moreover, the Project would not include unusual or hazardous design features that are atypical to large scale commercial and residential developments. Therefore, impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LA Fire Department, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses. Development of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Such closures would be coordinated with the City of Los Angeles Departments of Transportation, Buildings and Safety, and the Department of Public Works. Closures would not be expected to interfere with emergency response or evacuation plans. As described under Public Services, this Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to site plan review by the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Because the Project would not be expected to result in inadequate emergency access, impacts would less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

a. 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 a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant with Mitigation Incorporated.

As described in the Cultural Resources section of this SCEA, the NAHC search of the Sacred Lands File returned a negative result. The condition of the parcel and specifically the presence or

absence of archaeological materials prior to the initial development and subsequent redevelopment on the property is unknown. As such, archaeological monitoring of initial ground disturbance related to the Project, up to approximately sixfeet in depth or when a qualified archaeologist has recommended that the possibility of encountering archaeological material has been exhausted, is recommended as a mitigation measure. The language would read:

MM-TCR-1: The Applicant shall retain a qualified archaeological monitor who meets the Secretary of the Interior's Professional Qualifications Standards for an archaeologist who shall be present during construction excavations such as grading, trenching, grubbing or any other construction excavation activity associated with the Project. The frequency of monitoring shall be determined by the archaeological monitor based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus fill soils, and the depth of excavation, and if found, the abundance and type of archaeological resources encountered.

MM-TCR-2: In the event that archaeological resources are unearthed during ground-disturbing activities, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Work shall be allowed to continue outside of the vicinity of the find. All archaeological resources unearthed by Project construction activities shall be evaluated by the archaeologist. The Applicant shall coordinate with the archaeologist and the City to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register or potentially qualify as unique archaeological resources pursuant to CEQA. In the event the archaeological resources are prehistoric, the archaeological monitor shall coordinate with the Applicant and the City to retain a Native American Representative from the Gabrieleno/Tongva San Gabriel Band of Mission Indians tribe to help determine the appropriate treatment for the resources and whether Native American construction monitoring is warranted in the area of the find thereafter. If avoidance of the resource is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource from the Project Site.

Incorporating such mitigation measures would reduce potential impacts to less than significant.

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant with Mitigation Incorporated. There are no resources at the project site that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, as described above, there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. In the event that such resources are determined to be significant under PRC § 5024.1, the project could result in significant impacts to such resources, if the resource is disturbed, destroyed, or otherwise improperly treated. As such, **Mitigation Measure TCR-2** has set forth procedures to ensure that any finds that are exposed during construction activities for the proposed project are properly handled and treated. Upon incorporation of **Mitigation Measure TCR-2**, impacts to tribal cultural resources would be less than significant.

19. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

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?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

Like most projects in the City of Los Angeles, water services for this Project would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP is the primary provider of water and electric services for the City of Los Angeles, servicing more than four million customers in 473 square miles through an intricate network of more than 7,000 miles of pipes.[164] This Project Site is centrally located in the City of Los Angeles within the Wilshire community area near the Hancock neighborhood, and is being served by an existing system of water lines.

The proposed project consists of 242 residential units and 10,900 square feet of commercial space, and as a result would increase the demand for water services. The following table provides an estimate of how much water would be needed to sustain this Project upon completion:

164 Los Angeles Department of Water and Power, Facts & Figures, accessed on February 18, 2021, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=yvd8gvrjg_4&_afrLoop=19640900766831.

Table IV.19-1
Project Water Use During Operation[165]

Land Use	Size	Usage Rate (gallons per day)	Water Use (gallons per day)
Residential per room	306 rooms	110 gpd/unit	33,660
Landscaping[166]	19,145 sf	39.7 gpd/1000 sf	760
Office	900 sf	120 gdp/1000 sf	108
Retail	10,000 sf	50 gdp/1000 sf	500
		Subtotal	**35,028**

Source: Impact Sciences, Inc. 2021

The Applicant would also comply with the City of Los Angeles' Low Impact Development Ordinances (City Ordinance No. 181,899 and No.183,833) and is recommended to implement Best Management Practices (BMPs) that have stormwater recharge or reuse benefits for the entire Project.

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 AFY in 2025.[167] The UWMP forecasts water demand by estimating baseline water consumption by use (single-family, multi-family, commercial/government, industrial), then by adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG's 2012 RTP.[168] 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).[169] Neither the UWMP 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

165 Estimated water demand is generated using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012)). The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

166 The Project meets the required 25% provided outdoor common open space. The Project's landscape plans reflect usage of low water vegetation including low-water use turf mounds and desert landscape mounds to reduce water usage. Wilshire Highland, Los Angeles, updated March 3, 2021.

167 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

168 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

169 SCAG, 2012 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

(groundwater, recycled, conservation, LA aqueduct) is offset with Metropolitan Water District (MWD) purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit, as the Project does not propose any changes to the land use or zoning designations for the Project Site. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site.

As shown on **Table IV.19-1**, the Project would demand an increase of approximately 35,028 gallons of water per day (or 0.04 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the Project. As provided in the Project Description, the Project includes numerous sustainable features aimed at increasing energy efficiency, reducing GHG emissions and water demand. The Project would be designed in line with the California Green Building Code for sustainability. The project is being designed to promote more sustainable buildings by minimizing impacts on the environment and increasing greenspace. With the remaining capacity of approximately 50 to 150 mgd, the Los Angeles Aqueduct Filtration Plant (LAAFP) would have adequate capacity to serve the Project's projected demand for treatment of 0.04 mgd. Therefore, impacts related to water treatment would be less than significant and the Project would be adequately served by existing treatment facilities.

In addition, the LADWP has provided a 'Will Serve' letter dated September 2, 2021, stating the Project "can be supplied with water from the municipal system subject to the Water System rules of the Los Angeles Department of Water and Power (LADWP)." A copy of the letter is included in **Appendix I** of this SCEA.

Wastewater

The Los Angeles Bureau of Sanitation would provide sewer service to the proposed Project area. Sewage from the Project Site would be conveyed through existing infrastructure and deposited at the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 million gallons per day (mgd) and has the capacity to treat 450 mgd.[170] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

As shown in Table 4.19-2, the Project is estimated to generate a net total of approximately 22,900 gallons per day (or 0.04 million gallons per day) of wastewater. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project's projected 0.04 mgd generation. Further, as stated above, the Project does not propose any changes to the zoning or

170 City of Los Angeles Department of Public Works, Bureau of Sanitation, "Wastewater System Fact Sheet" (2014).

land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates. Furthermore, the Project Applicant would be required to implement applicable LA Green Building Code requirements that would further reduce wastewater flow. The Project is being designed to promote more sustainable buildings by minimizing impacts on the environment and increasing greenspace. Therefore, impacts related to wastewater treatment would be less than significant, and the Project would be adequately served by the City's wastewater facilities. As part of the Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve the Project, the Project Applicant would be required to install adequately sized sewer lines.

In addition, in a letter dated September 20, 2021, the Bureau of Sanitation has confirmed that there is capacity available to handle the anticipated discharge from the proposed project. A copy of the letter is included in **Appendix I** of this SCEA.

Thus, sewer infrastructure would be adequate to accommodate the Project. Therefore, impacts related to wastewater service would be less than significant.

Table IV.19-2
Project Wastewater Generation During Operation

Land Use	Quantity	Generation Rate (gpd/unit)	Total Wastewater Generation (gpd)
Bedrooms	306	75/Room	22,950
Office Space	900 sf	50/1000 sf	45
Retail Area	10,000 sf	25/1000	250
Swimming Pool	1 unit	113/unit	113
		Subtotal Proposed	**23,358**
Existing Retail Area	36,330 sf	25/1000 sf	908
		Net Total	**22,450**

Source: Impact Sciences, Inc. 2021

Stormwater

The Project Site is located within the Ballona Creek urban watershed[171] in a developed area of Los Angeles served by LA Sanitation. Therefore, this Project would be subject to the policies of the Watershed Protection Program, which employs a multi-pronged approach to ensure the City of Los Angeles is in compliance with regulations and reduce the amount of pollution flowing into and through regional waterways.[172] One such regulation includes the LID Ordinance. The primary purpose of the LID Ordinance is to ensure development projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. The Stormwater LID Ordinance requires LID measures be incorporated into the design of all development and redevelopment projects that have a land disturbance activity and add, create or replace 500 square feet or more of impervious area. As such, this Project would be subject to LID measures by:

- Reducing stormwater/urban runoff while improving water quality;
- Promoting rainwater harvesting;
- Reducing offsite runoff and providing increased groundwater recharge;
- Reducing erosion and hydrologic impacts downstream; and
- Enhancing the recreational and aesthetic values in our communities.[173]

Further, as detailed above in Hydrology, the Project is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ[174] as well as NPDES Construction General Permit and a SWPPP would be prepared and implemented for the proposed project in compliance with the

171 Los Angeles Geohub. *Watersheds*. Available online at: https://geohub.lacity.org/datasets/watersheds?geometry=-118.375%2C34.025%2C-118.370%2C34.027.

172 Watershed Protection. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp?_afrLoop=2799911397528235&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_299#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2799911397528235%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_303.

173 Watershed Protection. Ordinance and History. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-lid/s-lsh-wwd-wp-lid-oh?_adf.ctrl-state=nqhx0d7oj_380&_afrLoop=2800477855450270#!.

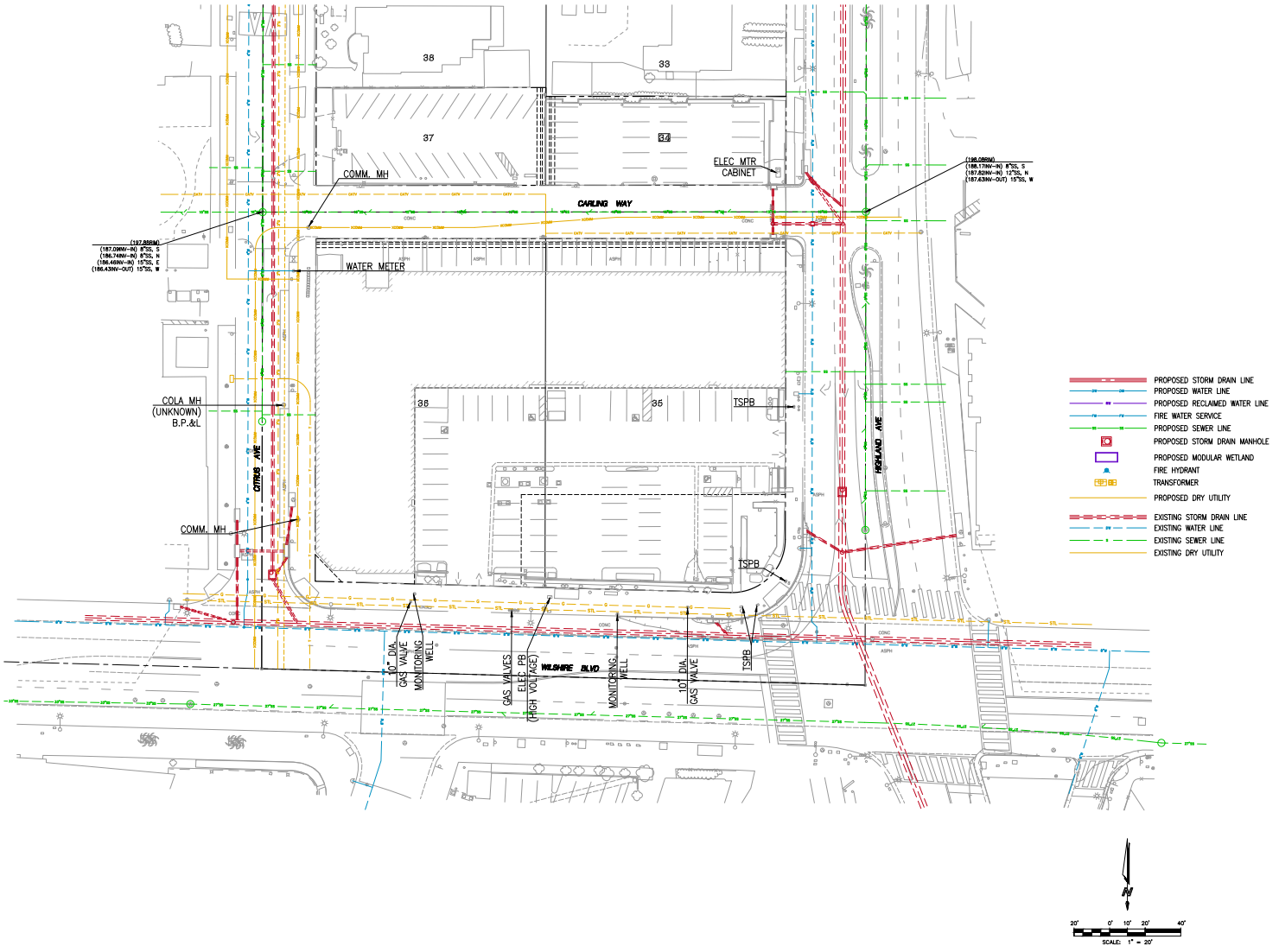
174 Watershed Protection, General Construction Activity Stormwater Permit. LA Sanitation – City of Los Angeles. Available online at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ec/s-lsh-wwd-wp-ec-rm?_afrLoop=2802032421121765&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_1068#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2802032421121765%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_1072.

requirements of the NPDES Permit. The SWPPP would identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Electric power, Natural gas, and Telecommunications

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas, and telecommunications services. Electricity would be provided by LADWP the proposed project will be all electric and will not use natural gas. In the context of the greater Los Angeles service area and the growth forecasts used by utility service providers, the Project would not be a substantial source of new unplanned demand for electrical, gas or telecommunications services (Refer to 'Energy' above). New connections for the Project would be coordinated with the appropriate service provider. Any trenching or other excavation within the public right of way would also be coordinated with the City Department of Public Works.

Based on the survey and existing Los Angeles records, there are existing utility lines that run around the perimeter of the property (see **Figure IV.19-1, Existing Utility Map**). The Applicant is proposing to include a sewer line through Carling Way, and a water line parallel to Highland Avenue to accommodate the development. The Project would not require relocation of electrical, gas, or telecommunications facilities, the relocation of which could cause significant environmental effects. Therefore, impacts to water, wastewater, stormwater, and other utilities would be less than significant.



SOURCE: Fusco Engineering, 2021

FIGURE **IV.19-1**

IMPACT SCIENCES

Existing Utility Map

1345.001•04/2021

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Refer to 'a' above. As shown in **Table IV.19-1** under projected water use, the Project would result in an increase of at least 35,028 gallons per day in water consumption. 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 Metropolitan Water District (MWD) purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit, as the Project does not propose any changes to the land use or zoning designations for the Project Site. Therefore, the impact would be less than significant. Refer also to the LADWP 'Will Serve' letter provided in **Appendix I**.

c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Refer to '19 a' above. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project's projected 0.04 mgd generation. Further, as stated above, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates.

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 Impacts. A significant impact would occur if a project were to increase solid waste generation to such a degree that the existing and projected landfill capacity would not be enough to accommodate the additional solid waste. A project is determined to result in a significant impact on solid waste when: 1) considering the amount of projected waste generation during construction and operation of the project; 2) the need for additional solid waste facilities to adequately handle project-generated waste; and 3) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE), the Solid Waste Management Policy Plan (SWMPP), or the Framework Element of the Curbside Recycling Program.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout the County of Los Angeles. While the Bureau of Sanitation provides waste collection services to

single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill. The County's Public Works Department prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.[175] Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.[176] Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.[177] The Class III landfills have an estimated remaining capacity of 167.58 million tons, with 149.77 million tons open to the City. The unclassified landfill serving the County is Azusa Land Reclamation with an estimated 55.71 million tons of remaining capacity.[178]

Pursuant to the requirements of Senate Bill 137466, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

As shown in **Table IV.19-3**, **Project Construction Solid Waste Generation** after accounting for mandatory recycling, the Project would result in approximately 1,880.2 tons of construction waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

175 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

176 The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

177 The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003

178 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019

Table IV.19-3
Project Construction Solid Waste Generation

Land Use	Quantity	Generation Rate (lbs/sf)	Total (tons)
Construction Waste			
Residential	270,650 sf	4.38	592.7
Commercial/Retail Area	10,900 sf	3.89	21.2
Parking Structure	164,340 sf	3.89	319.6
Demolition Waste			
Commercial Structure	85,000 sf	155	6,587.5
Total for Construction and Demolition Waste			**7,521.1**
Total after 75-Percent Recycling			***1,880.3***

sf = square feet lbs = pounds 1 ton = 2,000 pounds

Rate: 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 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types

Source: Impact Sciences, 2021

Table IV.19-4
Project Operational Solid Waste Generation

Land Use	Quantity	Generation Rate[a, b]	Total (tons)
Existing Conditions			
Commercial Structure	85,000 sf / 230 emp	2.98 tons/emp/yr	686.4
Existing Subtotal			**686.4**
Proposed Project			
Residential	242 du	2.23 tons/du/yr	539.7
Commercial/Retail Area	10,900 sf / 30 emp	2.98 tons/emp/yr	10.1
Project Subtotal			**549.8**
Total Net Decrease			***-136.6***

sf = square feet du = dwelling unit emp = employee lbs = pounds 1 ton = 2,000 pounds.

a Commercial employee generation = 0.00271/sf. Employee Generation Rates from LOS Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14

b Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau Of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002 Residential rates are from LA CEQA Thresholds Guide

Source: Impact Sciences, 2021

As shown in **Table IV.19-4, Project Operational Solid Waste Generation** the Project would generate approximately 549.8 tons per year of solid waste. This would be a net decrease of approximately 136.6 tons per year in on-site solid waste generation over the exiting uses of approximately 686.4 tons per year. Further, the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[179]

The Project solid waste disposal would represent approximately 0.017 of a percent of the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The Project solid waste disposal would represent approximately 0.0004 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of retail and mixed-use residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would be less than significant.

179 The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise." Available online at: www.lacitysan.org/san/faces/ home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lshwwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9at yQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4

20. Wildfire

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in a highly urbanized and built out commercial and residential area surrounded by existing roadways, transportation rails and other urban infrastructure. The Site is not located within or near the vicinity of a Very High Fire Hazard Severity Zone (VHFHSZ).[180] The City of Los Angeles Fire Department (LAFD) identifies the Kenneth Hahn State Recreation Area, Griffith Park and the Hollywood Hills as areas of VHFHSZ. The Project Site is located approximately three miles south of the Hollywood Hills, three and a

180 The Very High Fire Hazard Severity Zone (or "Zone") was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The "Zone" was carefully determined according to California State Law. Los Angeles Fire Department, Fire-Zone, https://www.lafd.org/fire-zone.

half miles south of Griffith Park, and three- and three-quarter miles from Kenneth Hahn State Recreation Area. The City of Los Angeles Emergency Operations Plan – Evacuation Annex identifies the LAFD as the lead in conducting evacuations for brush fires.[181] The Evacuation Annex's objectives include providing a concept of operations to support evacuation procedures including transportation resources. Preparedness is key in successful evacuations, and in this case it is important residents have the ability to leave the Project Site quickly and safely through a number of transportation means available to them. The Site is surrounded on all sides by existing infrastructure including roadways and a transit metro line. Two major freeways serve the Project Site, providing ready access to residents and employees of the proposed Project: Interstate 10 is located about two miles south of the Site, and U.S. 101 is located two and three-quarters to the northeast. Therefore, due to the Project's distance from VHFHSZ and ability for residents and employees to evacuate in the event of a fire, impacts would be less than significant.

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 Impact. As stated above, the Project is located three miles from VHFHSZ to the northeast and to the south of the Site. However, the Project Site itself is leveled due to urban infrastructure and development, and does not have wildlands or natural habitat that could exacerbate an ongoing fire. The Site is also served by LAFD Fire Station 61, located at 5821 West 3rd Street, about one mile away from the Project Site.[182] Therefore, given the leveled urbanized location of the Project Site and the Fire Station nearby, the probability of a brush fire spreading significantly beyond the identified VHFHSZ area is small. This would result in a less than significant impact.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is located within an urbanized area of the City and does not include wildlands nor high fire terrain. The Site is surrounded on all sides by existing infrastructure including roadways and a transit metro line. Moreover, two major freeways - Interstate 10 and

181 City of Los Angeles Evacuation Annex 2018. Available online at: https://emergency.lacity.org/sites/g/files/wph496/f/Evacuation%20Annex%202018.pdf

182 Los Angeles Fire Department, Find My Station. Available online at: https://www.lafd.org/fire-stations/station-results, accessed on March 25, 2021.

U.S. 101- are located several miles from the Site, providing ready access to residents and employees of the proposed Project. Therefore, no impacts would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The project site is a leveled, flat area of the Wilshire Community Plan Area near the Hancock Park neighborhood in a highly urbanized section of Los Angeles. The risk of wildfire or the resulting runoff and drainage changes as a result of a wildfire would not exist because any wildfire that could potentially occur would be at the State Recreation Area to the south of the Project Site, or the Hollywood Hills/Griffith Park to the north and northeast, but not on the Project Site itself. Therefore, there would be no impact.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. As discussed under **Biological Resources,** the project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the project site and the surrounding area, construction and operation of the proposed project would not impact the habitat or population of the project site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 4.5, Cultural Resources** and **4.7, Geology and Soils**, potential impacts related to historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance and mitigation measures.

Therefore, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant with Mitigation Incorporated. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other developments to result in impacts that are greater than those of this Project alone. Located within the vicinity of the project site are other past, current, and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. However, based on the proceeding discussions, which consider cumulative conditions/impacts, no unmitigatable significant impacts were identified for the environmental

resources identified in this SCEA. The proposed Project would not result in any unmitigated significant impacts pursuant to the topics analyzed in the above Environmental Checklist, and therefore cumulative impacts would be less than significant with recommended mitigations incorporated.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. A significant impact could occur if the Project has the potential to result in significant impacts. As identified throughout this SCEA, the proposed project would have no unmitigatable significant impacts that would cause substantial adverse effects to human beings directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures recommended. Therefore, the impact would be less than significant with mitigation incorporated.