



Mirabel Transit Priority Project

Case Number: ENV-2019-3937-EIR

Project Location: 5401 – 5425 Wilshire Boulevard, 664-670 Cochran Avenue, and 665 – 671 Cloverdale Avenue, Los Angeles, CA 90036

Council District: 5 – Katie Yaroslavyk

Project Description: The Project consists of the construction and operation of up to 348 dwelling units and approximately 12,821 square feet of ground floor commercial uses. Twenty nine of the dwelling units would be income-restricted affordable for Very Low Income households. The Project would remove approximately 38,545 square feet of existing commercial uses, including the existing commercial building at 5401 Wilshire Boulevard, which is a contributor to the Miracle Mile Historic District. The east and south façades of the 5401 Wilshire Boulevard building would be retained while the remainder of the building is demolished in order to construct the Project's subterranean levels. The east and south façades of the building at 5401 Wilshire Boulevard would be rehabilitated and incorporated into a new one-story building at 5401 Wilshire Boulevard. The remainder of the Project Site would be developed with a new 42-story mixed-use tower (39 stories over a three-level podium) with three levels of subterranean parking and a maximum height of 530 feet. The Project would include a total floor area of up to 476,777 square feet.

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Department of City Planning

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1 INTRODUCTION

An application for the proposed Mirabel Transit Priority Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (City), as lead agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code (PRC) §21000 et seq., and PRC Section 21155),¹ the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), Senate Bill 375 (SB 375), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in this document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. As discussed below, the Project qualifies as a Transit Priority Project, and the EIR will be prepared pursuant to PRC Section 21155.2(c). This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the lead agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration

¹ All references to the Public Resources Code or PRC in this Initial Study refer to the California Public Resources Code.

is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.²

1.2 SB 375 STREAMLINING PROVISIONS

The State of California adopted SB 375, also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate a “sustainable communities strategy” (SCS) into the regional transportation plans (RTPs) to achieve their respective region’s GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining tools for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. One such CEQA streamlining tool is the Sustainable Communities Environmental Impact Report (SCEIR).

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). In this capacity, SCAG bears the responsibility under SB 375 to implement and administer RTPs and sustainable communities strategies (SCSs) for purposes of achieving the goals for reducing greenhouse gases as envisioned by AB 32. The applicable sustainable communities strategy relevant to the region including the Project Site is SCAG’s 2020-2045 RTP/SCS, which is a long-range visioning plan for the six-county SCAG region, that highlights the existing land use and transportation conditions throughout the SCAG region and forecasts how it will meet the region’s transportation needs between 2020 and 2045, as well as achieve CARB’s GHG emissions reduction targets. Specifically, the 2020-2045 RTP/SCS identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as aviation ground access. It also includes a set of visions, goals, objectives, policies and performance measures developed through public and stakeholder outreach sessions across SCAG’s region. On May 7, 2020, SCAG’s Regional Council certified the Program EIR prepared for the 2020-2045 RTP/SCS, and on September 3, 2020, SCAG’s Regional Council formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB’s 2035 GHG emissions reduction target.

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see Public Resources Code Sections 21155 (a) and (b)):

² State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the lead agency when there is substantial evidence that the project may cause a significant effect on the environment: “(A) Prepare an EIR, or (B) Use a previously prepared EIR which the lead agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project’s effects were adequately examined by an earlier EIR or negative declaration.”

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

Pursuant to Public Resources Code Section 21155.2(a), qualifying TPPs that have incorporated all feasible mitigation measures and performance standards, or criteria set forth in the prior applicable EIR (e.g., SCAG's 2020-2045 RTP/SCS Program EIR) are eligible to prepare a Limited analysis EIR (or SCEIR)³ that complies with the following (Public Resources Code Section 21155.2(c)):

- (1) An initial study shall be prepared to identify all significant or potentially significant effects of the transit priority project other than those that do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative impact effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable for purposes of this subdivision.
- (2) An environmental impact report prepared pursuant to this subdivision need only address the significant or potentially significant effects of the transit priority project on the environment identified pursuant to paragraph (1). It is not required to analyze off-site alternatives to the transit priority project. It shall otherwise comply with the requirements of this division.

Pursuant to Public Resources Code Section 21159.28, the following topics would not need to be analyzed in the SCEIR:

- a. Growth-inducing impacts;
- b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network;⁴ and

³ Note that the terms "Limited EIR" and "SCEIR" are interchangeable.

⁴ "Regional transportation network" means all existing and proposed transportation system improvements, including the state transportation system, that were included in the transportation and air quality conformity modeling, including congestion

- c. A reduced residential density alternative to address the effects of car and light-duty truck trips generated by the Project.

1.3 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4 SUSTAINABLE COMMUNITIES EIR FINDINGS AND CONSISTENCY ANALYSIS

Provides a discussion of the Project's consistency with the transit priority project criteria and demonstrates that the Project satisfies all necessary criteria for a SCEIR as set forth in Public Resources Code Sections 21155 and 21155.2.

5 MITIGATION MEASURES FROM PRIOR EIRS

Identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for the City's Housing and Safety Element EIR and SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project.

6 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

modeling, for the final regional transportation plan adopted by the metropolitan planning organization, but shall not include local streets and roads. Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads.

7 PROJECT INCORPORATION OF MITIGATION MEASURES

Contains a list of mitigation measures the Project would incorporate from the City's Housing and Safety Element EIR.

1.4 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://resources.ca.gov/ceqa>).

Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine whether the Proposed Project may have a significant effect on the environment. As set forth in Section 6 below, this Initial Study determines that the Proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the Proposed Project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process and may certify the Final EIR and approve the Project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	Mirabel Transit Priority Project
ENVIRONMENTAL CASE NO.	ENV-2019-3937-EIR
RELATED CASES	CPC-2020-3143-DB-CDO-SPR-HCA, VTT-82716

PROJECT LOCATION	5401-5425 Wilshire Boulevard, 664-670 Cochran Avenue, and 665-671 Cloverdale Avenue, Los Angeles, CA 90036
COMMUNITY PLAN AREA	Wilshire
GENERAL PLAN DESIGNATION	Regional Commercial
ZONING	[Q]C4-2-CDO and [Q]C2-1-CDO
COUNCIL DISTRICT	5-Katie Yaroslavsky

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
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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.

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input checked="" type="checkbox"/> 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 revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one 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 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.

Jason McCrea, City Planner

PRINTED NAME, TITLE

August 31, 2023

DATE

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 may be 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 a mitigation measure has reduced an effect from "Potentially Significant Impact" to "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," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must 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. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - 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 document and the extent to which they 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 sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) 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 significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project consists of the construction and operation of up to 348 dwelling units and approximately 12,821 square feet of ground floor commercial uses. Twenty nine of the dwelling units would be income-restricted affordable for Very Low Income households. The Project would remove approximately 38,545 square feet of existing commercial uses, including the existing commercial building at 5401 Wilshire Boulevard, which is a contributor to the Miracle Mile Historic District. The east and south façades of the 5401 Wilshire Boulevard building would be retained while the remainder of the building is demolished in order to construct the Project's subterranean levels. The east and south façades of the building at 5401 Wilshire Boulevard would be rehabilitated and incorporated into a new one-story building at 5401 Wilshire Boulevard. The remainder of the Project Site would be developed with a new 42-story mixed-use tower (39 stories over a three-level podium) with three levels of subterranean parking and a maximum height of 530 feet. The Project would include a total floor area of up to 476,777 square feet.

Additional details are provided below under "Project Characteristics."

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is comprised of six lots totaling approximately 57,374 square feet and includes the following addresses: 5401 – 5425 Wilshire Boulevard; 664 – 670 Cochran Avenue;⁵ and 665 - 671 Cloverdale Avenue. The Site is generally bounded by Wilshire Boulevard to the south, Cloverdale Avenue to the east, multi-family residential uses to the north, and Cochran Avenue to the west. The Project Site has approximately 260 linear feet of frontage on Wilshire Boulevard, 220 linear feet of frontage on Cochran Avenue, and 227 feet of linear frontage on Cloverdale Avenue.

The Project Site is located within the Wilshire Community Plan area of the City of Los Angeles, approximately nine miles from the Pacific Ocean, and bears the land use designation Regional Commercial, which corresponds to the CR, C1.5, C2, C4, P, PB, RAS3, RAS4, R3, R4 and R5 zones defined in the Los Angeles Municipal Code (LAMC). The Project Site is zoned [Q]C4-2-CDO and [Q]C2-1-CDO. The Project Site is also located in the Miracle Mile Community Design Overlay (CDO). The Miracle Mile is a one-mile commercial corridor fronting Wilshire Boulevard, which extends from Sycamore Avenue to Fairfax Avenue. The Miracle Mile area reflects the commercial expansion in Los Angeles during the 1920s and 1930s attributable to the emergence of the automobile, which led to the creation of a unique urban commercial center outside of

⁵ The existing Project Site addresses on Cochran Avenue are 664 – 670 Cochran Avenue. As part of the Project, the Applicant intends to file for addresses up to 690 Cochran Avenue.

Downtown Los Angeles. The commercial buildings constructed during this time along this section of Wilshire Boulevard are generally representative of the Art Deco and Streamline Moderne architectural styles.

3.2.2 Existing Conditions

The Project Site is currently developed with two commercial buildings (currently occupied by Staples and Wilshire Beauty Supply), totaling approximately 38,545 square feet, and associated surface parking. There are 11 existing trees on the Project Site, although none are protected under the City's Protected Tree Ordinance.⁶ There are currently no street trees along the Project Site frontage on Wilshire Boulevard, Cochran Avenue, or Cloverdale Avenue. The Project Site is within the boundaries of the Miracle Mile Historic District, and the existing building at 5401 Wilshire Boulevard is a contributor to this District.

A map showing the Project Site in its regional and local context is included as Figure 3-1, and an aerial photograph is provided as Figure 3-2.

3.2.5 Surrounding Land Uses

The surrounding neighborhood is improved with a variety of office, retail, restaurant, and residential uses. The area adjacent to the Project Site to the north is zoned [Q]C2-2-CDO and is improved with two-story multi-family residential buildings, which are part of the Ridgeley Drive-Detroit Street Multi-Family Residential Historic District (identified through SurveyLA in 2015). Properties adjacent to the Project Site to the west, east, and south are zoned [Q]C4-2-CDO. To the west, across Cochran Avenue, is a 24-story commercial building. The property to the east, across Cloverdale Avenue, is improved with a two-story commercial building and the property to the south, across Wilshire Boulevard, is improved with a ten-story commercial building.

3.2.6 Surrounding Transit

The Project Site is located approximately 625 feet west of the intersection of Wilshire Boulevard and La Brea Avenue, an intersection that is served by several Metro Rapid and Metro Local Bus lines. The Metro Rapid Bus Line 720 runs east-west along Wilshire Boulevard between Santa Monica and East Los Angeles, providing access to destinations such as Downtown Los Angeles and Westwood along the route. Metro Local Bus Line 20 runs along the same route between Santa Monica and East Los Angeles. Under Metro's NextGen Plan, lines 20 and 720 have been merged, providing service between Santa Monica and Downtown Los Angeles. Both the Metro 720 and 20 Bus Lines, along with local Los Angeles Department of Transportation (LADOT) DASH service, stop in front of the Project Site at the intersection of Wilshire Boulevard and Cloverdale Avenue. During peak hours, Wilshire Boulevard has 7.7 miles of dedicated bus-only lanes and the Rapid 720 offers all-door boarding to reduce delay times and provide a more

⁶ Tree Report, prepared by Carlberg Associates, October 17, 2021, included as Appendix B of this Initial Study,

efficient and reliable transit option. Additionally, the Antelope Valley Transit (AVTA) Line 786, provides access to destinations along Wilshire Boulevard.⁷

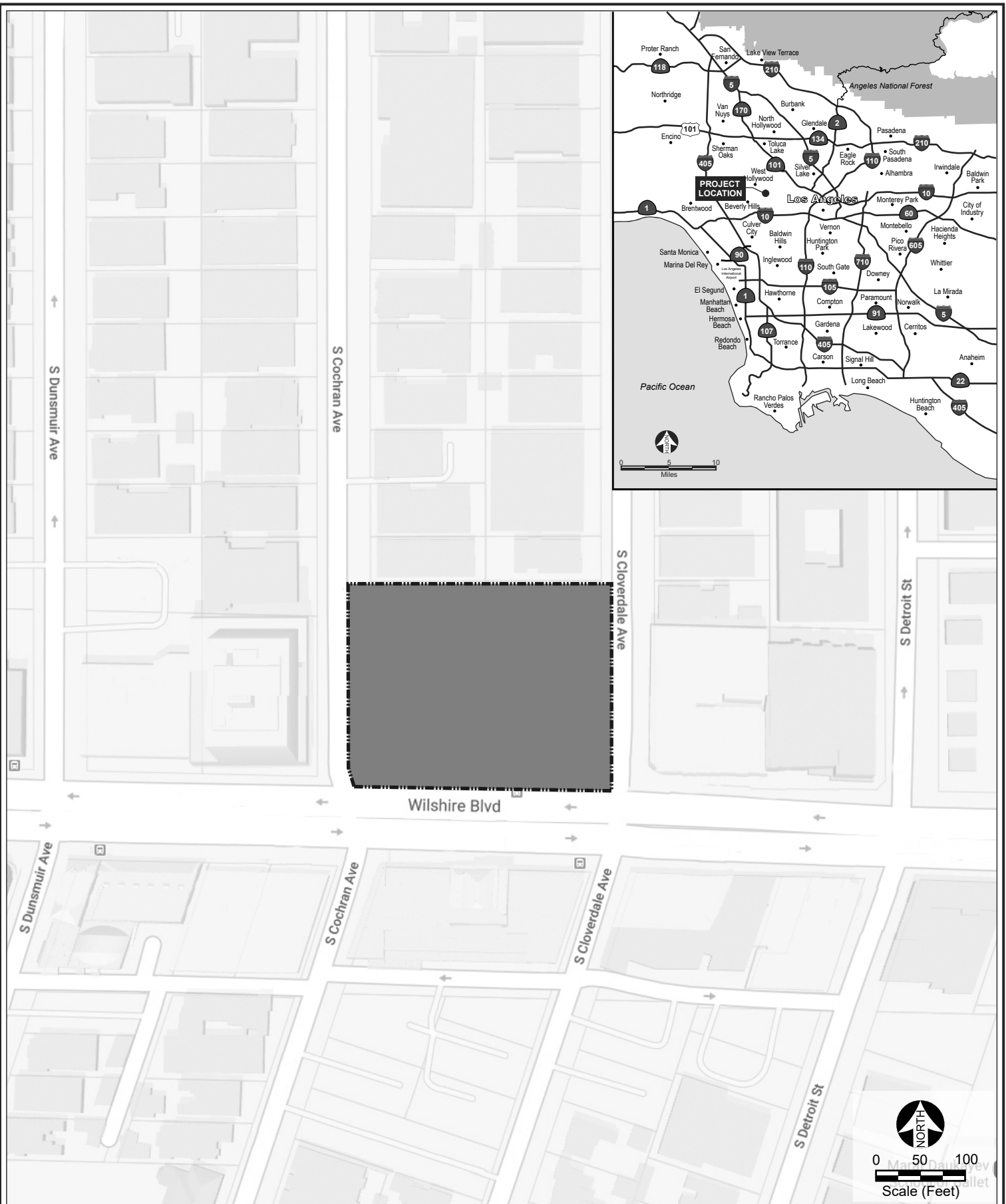
Metro Local Bus Line 212 travels north-south on La Brea Avenue between Hawthorne and Hollywood, where it connects to the Metro Red Line. During peak hours, the Metro Bus Line 312 operates on the same route but with limited stops between Obama Boulevard and Sunset Boulevard, providing faster and more reliable transit service. Under Metro's Next Gen Plan, lines 212 and 312 have been merged.

Additionally, LADOT operates the Fairfax DASH bus route, which stops in front of the Project Site. This route connects the Project Site to local destinations such as Cedars-Sinai Medical Center, the Beverly Center, the Grove, LACMA, and West Hollywood.

In addition to the bus lines described above, Metro's D Line Extension project, which is currently under construction, will include a heavy rail station at the intersection of Wilshire Boulevard and La Brea Avenue, approximately 625 feet from the Project Site. Currently, the D Line travels between Union Station and the Wilshire/Western Station in Koreatown. The westward extension will extend the D Line to run between Union Station and the VA Medical Center in Westwood, a trip that is expected to take approximately 25 minutes.⁸ The proposed Wilshire/La Brea station is scheduled to open in 2024. The Project is aiming for full completion by 2027.

⁷ AVTA Line 786 provides bus service from Palmdale Transportation Center to the V.A. Medical Center in West Los Angeles,

⁸ <https://www.metro.net/projects/westside/>



Legend

 Project Site

Source: Google Maps, 2021.

Figure 3-1
Regional Location Map



Legend



Project Site

Source: Google Maps, 2022.

Figure 3-2
Aerial Photograph

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project consists of the construction and operation of up to 348 dwelling units and approximately 12,821 square feet of ground floor commercial uses.⁹ Twenty nine of the dwelling units would be income-restricted affordable for Very Low Income households. The Project would remove approximately 38,545 square feet of existing commercial uses, including the existing commercial building at 5401 Wilshire Boulevard, which is a contributor to the Miracle Mile Historic District. The east and south façades of the 5401 Wilshire Boulevard building would be retained while the remainder of the building is demolished in order to construct the Project's subterranean levels. The east and south façades of the building at 5401 Wilshire Boulevard would be rehabilitated and incorporated into a new one-story building at 5401 Wilshire Boulevard. The remainder of the Project Site would be developed with a new 42-story mixed-use tower (39 stories over a three-level podium) with three levels of subterranean parking and a maximum height of 530 feet. The Project would include a total floor area of up to 476,777 square feet.

The podium deck (Level 4) would provide landscaped open space for Project residents including open space amenities pursuant to LAMC Section 12.21 G requirements. Interior residential amenities would include shared workspace areas, library, and fitness center. Overall, the Project includes approximately 38,592 square feet of open space of which approximately 7,041 square feet would be outdoor landscaped space. The Project would also provide 87 trees throughout the Project Site, and an additional five Canary Island Date Palms in the Wilshire Boulevard parkway.

The Project would also include a Sign Plan for the installation of up to 2,121 square feet of signage across three street frontages (Wilshire Boulevard, Cochran Avenue, and Cloverdale Avenue), including Projecting Signs, Window Signs, Wall Signs, Awning Signs, Information Signs, and regulatory signs for tenant identification, wayfinding, and public information purposes. All Project signage would comply with LAMC signage regulations.

The Project's site plan is included in Figure 3-3, floor plans are provided in Figures 3-4 through 3-6, elevations are provided in Figures 3-7 through 3-9, the landscape plan is provided in Figure 3-10, perspective views are provided in Figures 3-11 and 3-12, and the signage plan is provided in Figure 3-13. In addition, a breakdown of the Project's proposed floor area is provided in Table 3-1, below.

⁹ It is anticipated that all residential units would be rental units. However, as discussed later in this section under "Requested Permits and Approvals," the Project includes a Vesting Tentative Tract Map, which would allow for the sale of residential units.

**Table 3-1
Summary of Proposed Floor Area**

Land Use	Size
Residential	
Residential Units	348 du
Residential Square Footage	463,956 sf
<i>Total Residential</i>	<i>348 du (463,956 sf)</i>
Commercial	
Restaurant Square Footage	4,443 sf
Café Square Footage	1,000 sf
Retail Square Footage	7,378 sf
<i>Total Commercial</i>	<i>12,821 sf</i>
Total	476,777 sf
<i>du = dwelling units sf = square feet</i>	

3.3.2 Design and Architecture

The architectural design of the Project interprets the Streamline Moderne style of several buildings in the surrounding Miracle Mile through the imposition of a unique curvilinear tower with structural form. The exterior tower façade is designed such that each glazing unit overlaps against the next, providing shade and reducing the solar load into the building, and provides a textured and operable ventilation system. The tower would be set back from the podium edges to reduce the appearance of Project massing from the street level. Architectural features would include material changes, horizontal design elements, and Art Deco-inspired canopied entryways. The ground level would provide street-facing commercial uses with storefront glazing, as well as landscaping and pedestrian amenities.

The existing commercial building at 5401 Wilshire Boulevard, a contributor to the Miracle Mile Historic District, would be demolished and two of its façades would be retained and incorporated into the new building at 5401 Wilshire Boulevard to ensure that the building's Streamline Moderne architectural style and character-defining features are preserved. The other two façades and the building volume would be removed in order to construct the Project's subterranean parking. The east and south façades would be rehabilitated, the east façade would be extended approximately three feet to the north, and the south façade would be extended slightly to the west. Outdoor open space would be located on the roof of the rehabilitated building at 5401 Wilshire Boulevard.

3.3.3 Open Space and Landscaping

Pursuant 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 for 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 proposed unit mix includes 136 studio units, 102 one-bedroom units, and 110 two-bedroom units. Thus, the Project would construct 238 units with less than three habitable rooms and 110 units with three habitable rooms, yielding an open space requirement of 37,550 square feet. The Project would provide approximately 38,592 square feet of indoor and outdoor open space. Pursuant to LAMC Section 12.21.G.2(a)(4)(i), a maximum of 25% of the Project's total required open space may be provided as interior recreation rooms. The Project would provide approximately 9,388 square feet (25%) of its required open space in indoor recreation areas on the third, fourth, and fifth levels. Outdoor common open space would be provided on the Project's third and fourth levels. Level 3, the rooftop of the 5401 Wilshire Boulevard building, would include approximately 7,513 square feet of open space. The Level 4 podium deck would provide approximately 21,691 square feet of open space including recreational amenities such as sitting areas and a pool and spa. Overall, the outdoor common open space would total approximately 28,163 square feet. Approximately 7,041 square feet, or 25%, of the provided outdoor common open space would be landscaped.

Trees are required at the rate of one tree for every four residential dwelling units. As a result, 87 trees are required, and 87 trees would be provided throughout the Project Site. The Project would not remove any street trees and an additional five Canary Island Date Palms are proposed in the Wilshire Boulevard parkway.

3.3.4 Access, Circulation, and Parking

Vehicular Access

Vehicular access to the Project would be provided from the side streets (Cochran Avenue and Cloverdale Avenue) with no vehicle access proposed from Wilshire Boulevard. The Project includes a total of four driveways, two on Cochran Avenue and two on Cloverdale Avenue. Of the four driveways serving the Project, two driveways would provide off-street access for drop-off/pick-up, ride hailing services, deliveries, and loading on the ground floor via a one-way street-to-street porte-cochere from Cochran Avenue to Cloverdale Avenue (vehicles would enter the porte-cochere from Cochran Avenue and exit on Cloverdale Avenue). The remaining two driveways provide access for Project patrons and residents. Specifically, the driveway on Cochran Avenue would provide access to the above grade parking for patrons of the commercial uses, and the driveway on Cloverdale Avenue would provide access to the subterranean automated parking area for Project residents.

Pedestrian Access

Pedestrian access to the commercial uses would be from Wilshire Boulevard, Cochran Avenue, and Cloverdale Avenue. Primary access to the residential lobby would be from Cochran Avenue, and the Wilshire Boulevard lobby would provide additional residential access as well as access

to commercial patron parking. At the ground level, the Project would allow for landscaped areas with benches and outdoor dining at the proposed restaurants and café on Wilshire Boulevard, Cochran Avenue, and Cloverdale Avenue.

Vehicle Parking

The Project seeks approval of a Density Bonus entitlement and would include 136 studios, 102 one-bedrooms and 110 two-bedrooms. The Project proposes to set aside 11% of its base density for Very Low Income households (29 units). The Project Site is located approximately 625 feet west of the major transit stop at the intersection of Wilshire Boulevard and La Brea Avenue. Therefore, the Project qualifies for a parking reduction under the State Density Bonus Law, California Government Code Section 65915(p)(2), and thus, the Project would be required to provide 0.5 vehicle parking spaces per bedroom. Based upon the Project's 458 bedrooms, 229 residential parking spaces would be required.¹⁰ The Project would include 12,821 square feet of retail, restaurant, and café space, which would require 80 commercial parking spaces.

Residential parking, provided in the subterranean levels, would be parked in an automated parking system,¹¹ while the parking spaces for the commercial patrons would be provided above grade (levels 2-3) and would consist of traditional parking.

Bicycle Parking

Bicycle parking is required pursuant to LAMC Section 12.21.A.16(a). The Project proposes 348 dwelling units, requiring a total of 162 long-term and 17 short-term residential bicycle parking stalls. The Project would provide all 162 required long-term residential bicycle stalls within an enclosed room on the second level and would provide 18 short-term residential bicycle stalls at the ground floor on the sidewalk along Cochran Avenue.

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 contains 12,821 square feet of commercial area, which includes café, restaurant, and retail uses. In total, the Project is required to provide nine short-term and nine long-term bicycle parking spaces for commercial uses, and would provide 10 short-term and 10 long-term stalls. The short-term commercial bicycle parking would be located on the sidewalk along Wilshire Boulevard and Cloverdale Avenue, and the long-term commercial bicycle parking would be located within the commercial parking area on level 2 of the building's podium. In total, the Project would provide 200 bicycle parking spaces.

¹⁰ Without the allowable parking reductions per Government Code Section 65915(p)(2), the Project would be required to provide 509 residential parking spaces, consistent with the requirements of the LAMC.

¹¹ The automated parking system would allow residents to park in a specified loading area, and then the automated system would transfer the vehicle to the storage area. Once a resident is ready to retrieve their vehicle, they would call their vehicle using an app, kiosk, or keyfob, and the automated system would transfer their car to the specified loading area where the resident would retrieve it.

3.3.5 Sustainability

The Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations).

3.3.6 Anticipated Construction Schedule

The Project's construction would occur over approximately 36 months and would include the following phases: demolition, site preparation, grading and excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, paving, and architectural coatings. The Project is expected to become operational in 2027. The Project's estimated construction schedule is shown in Table 3-2.

**Table 3-2
Estimated Construction Schedule**

Phase	Duration
Demolition	Month 1
Site Preparation	Month 2
Grading	Months 3-7
Drainage/Utilities/Trenching	Month 5
Foundations/Concrete Pour	Months 5-6
Building Construction	Months 6-36
Paving	Months 25-36
Architectural Coatings	Months 8-36

Excavation to construct the Project is expected to reach a depth of 63 feet below the existing grade, and would result in approximately 152,032 cubic yards of material that would be exported from the Project Site and disposed of at the Vulcan Landfill in Sun Valley (while the driving distance to this facility is approximately 16 miles, the analysis contained in this Initial Study conservatively assumes a one-way distance of up to 30 miles). Therefore, a Haul Route would be required as part of the City's permitting process. The haul route would likely be as follows, subject to LADOT approval:

- Trucks would exit the Project Site by turning right onto southbound Cloverdale Avenue, left onto eastbound Wilshire Boulevard, and right onto southbound La Brea Avenue to access the I-10 freeway.
- Trucks returning to the Project Site would exit the I-10 freeway onto La Brea Avenue and would travel north on La Brea Avenue, turn left on Wilshire Boulevard, and right onto Cloverdale Avenue.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all public agency actions associated with the Project. The discretionary approvals required to implement the Project are:

1. Pursuant to **Los Angeles Municipal Code (LAMC) Section 12.22.A.25** and **Government Code Section 65915**, a Density Bonus for a Housing Development Project with 348 dwelling units, of which 11 percent of the base density, or 29 units, would be set aside for Very Low Income households, with the following on- and off-menu incentives:
 - Pursuant to **LAMC Section 12.22.A.25(f)(8)**, an on-menu incentive to average the density, floor area, open space, parking, and vehicle access across contiguous parcels in the [Q]C4-2-CDO and [Q]C2-1-CDO Zones.
 - Pursuant to **LAMC Section 12.22.A.25 (g)(3)**, an off-menu incentive to permit a Floor Area Ratio (FAR) of up to 8.31:1 across the [Q]C4-2-CDO and [Q]C2-1-CDO Zones, in lieu of the 6:1 FAR otherwise permitted in the C4-zoned portion of the Project Site, and the 1.5:1 FAR otherwise permitted in the C2-zoned portion of the Project Site.
2. Pursuant to **LAMC Section 12.24 W.1**, a Main Conditional Use Permit for the sale, dispensing, and consumption of a full-line of alcoholic beverages for on-site and off-site consumption at five establishments.
3. Pursuant to **LAMC Section 13.08.E**, a Community Design Overlay (CDO) Plan Approval for the partial demolition and rehabilitation of the existing improvements on the Project Site, the construction of a new mixed-use building, and a Sign Program allowing the installation of up to 2,121 square feet of signage within the boundary of the Miracle Mile CDO.
4. Pursuant to **LAMC Section 16.05**, a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units.
5. Pursuant to **LAMC Section 17.03 and 17.15**, a **Vesting Tentative Tract Map** for the merger and resubdivision of six ground lots into one ground lot and nine airspace lots.
6. Haul route for approximately 152,032 cubic yards of export.
7. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- None.

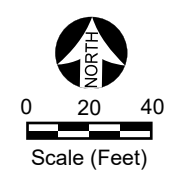
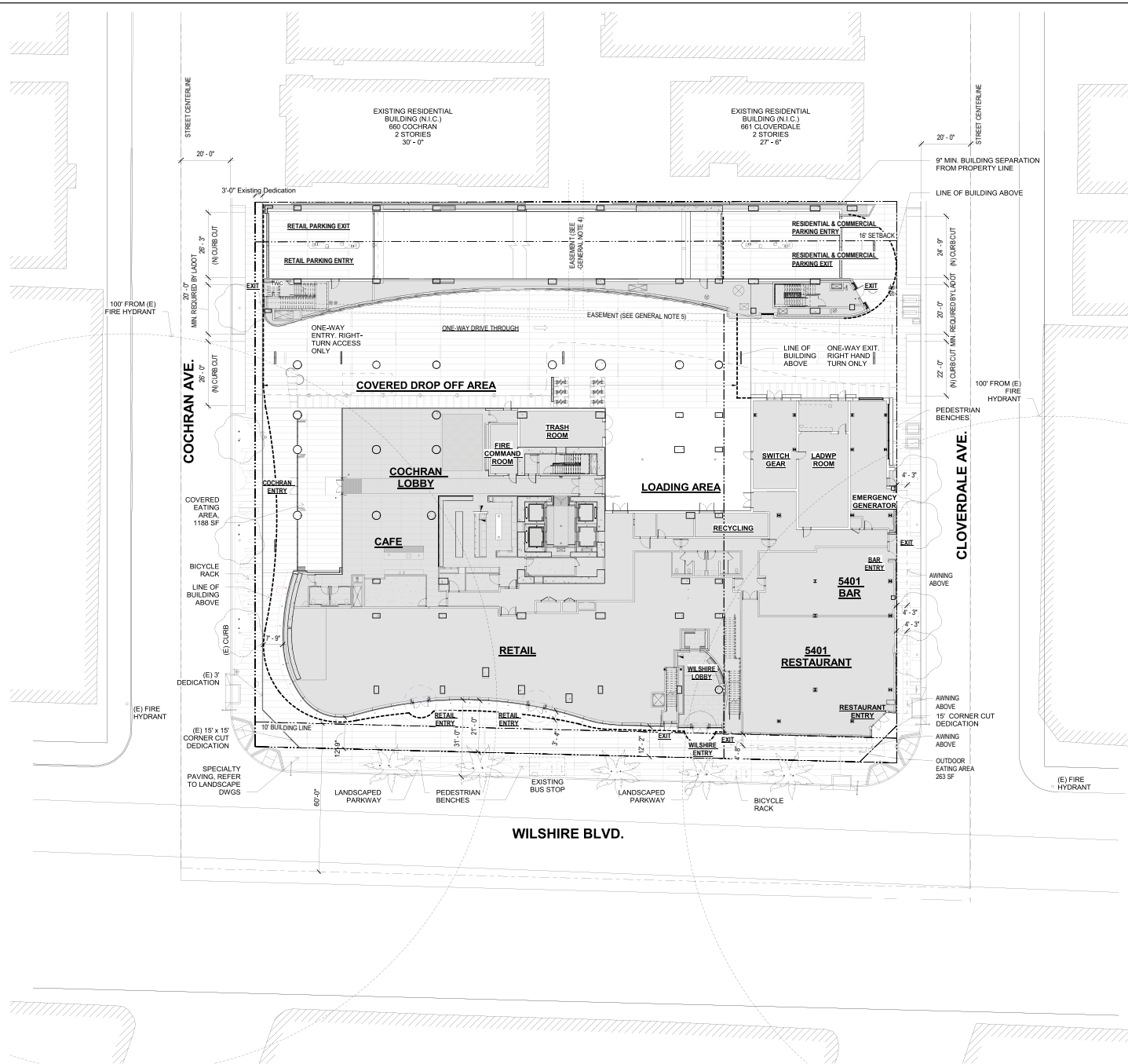
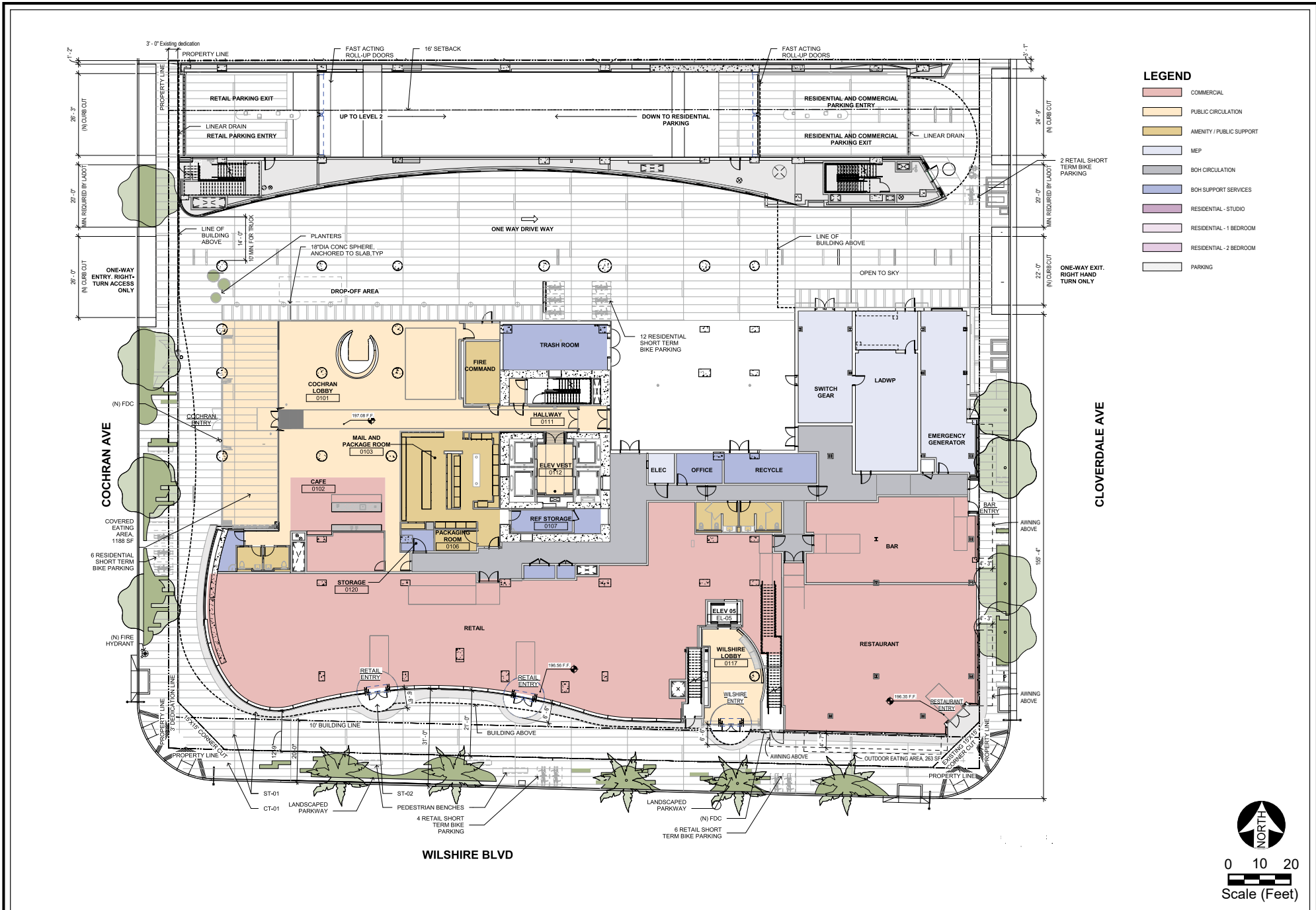


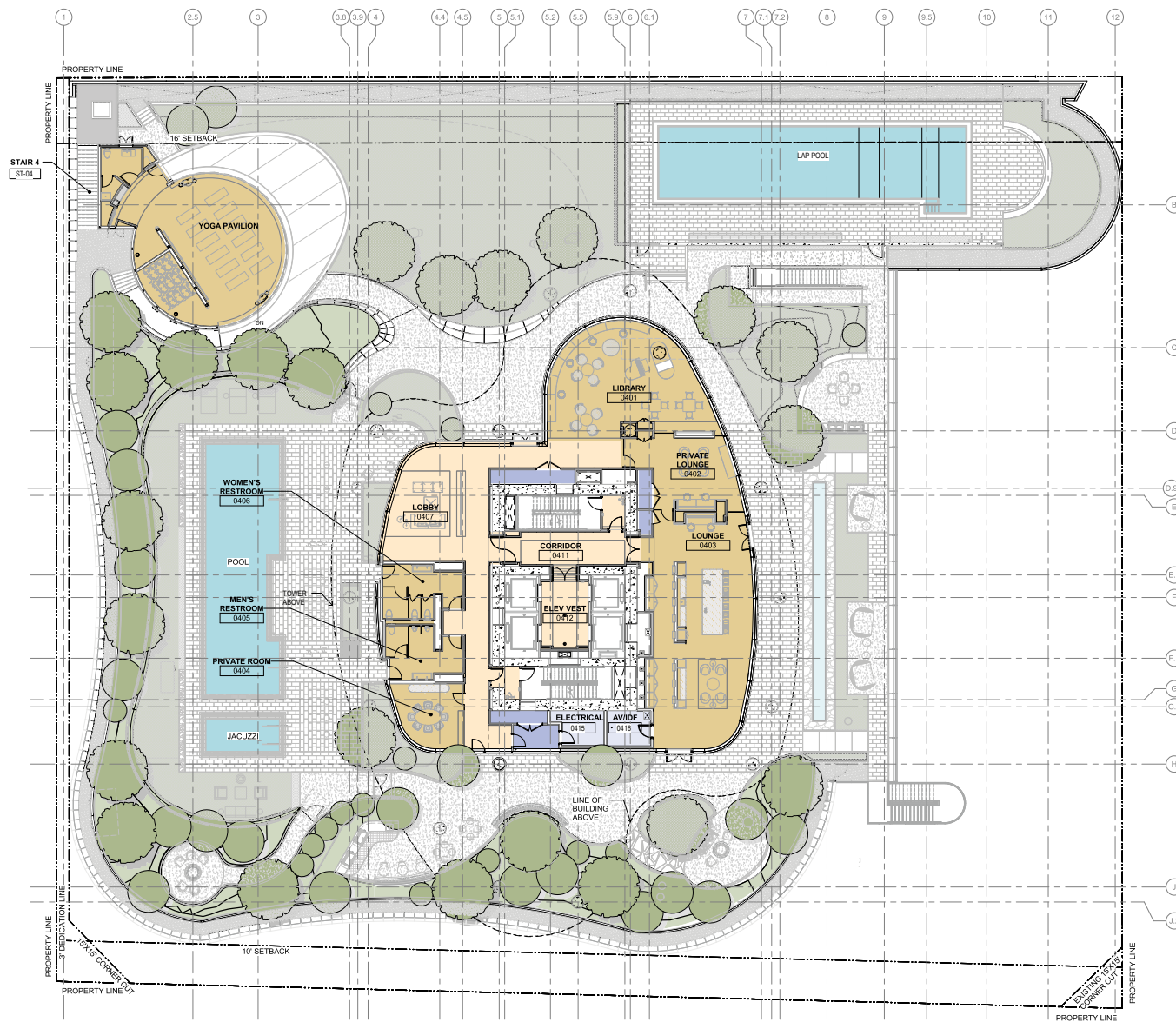
Figure 3-3
Site Plan

Source: Keating, 2022.



Source: Keating, 2022.

Figure 3-4
Ground Level Floor Plan



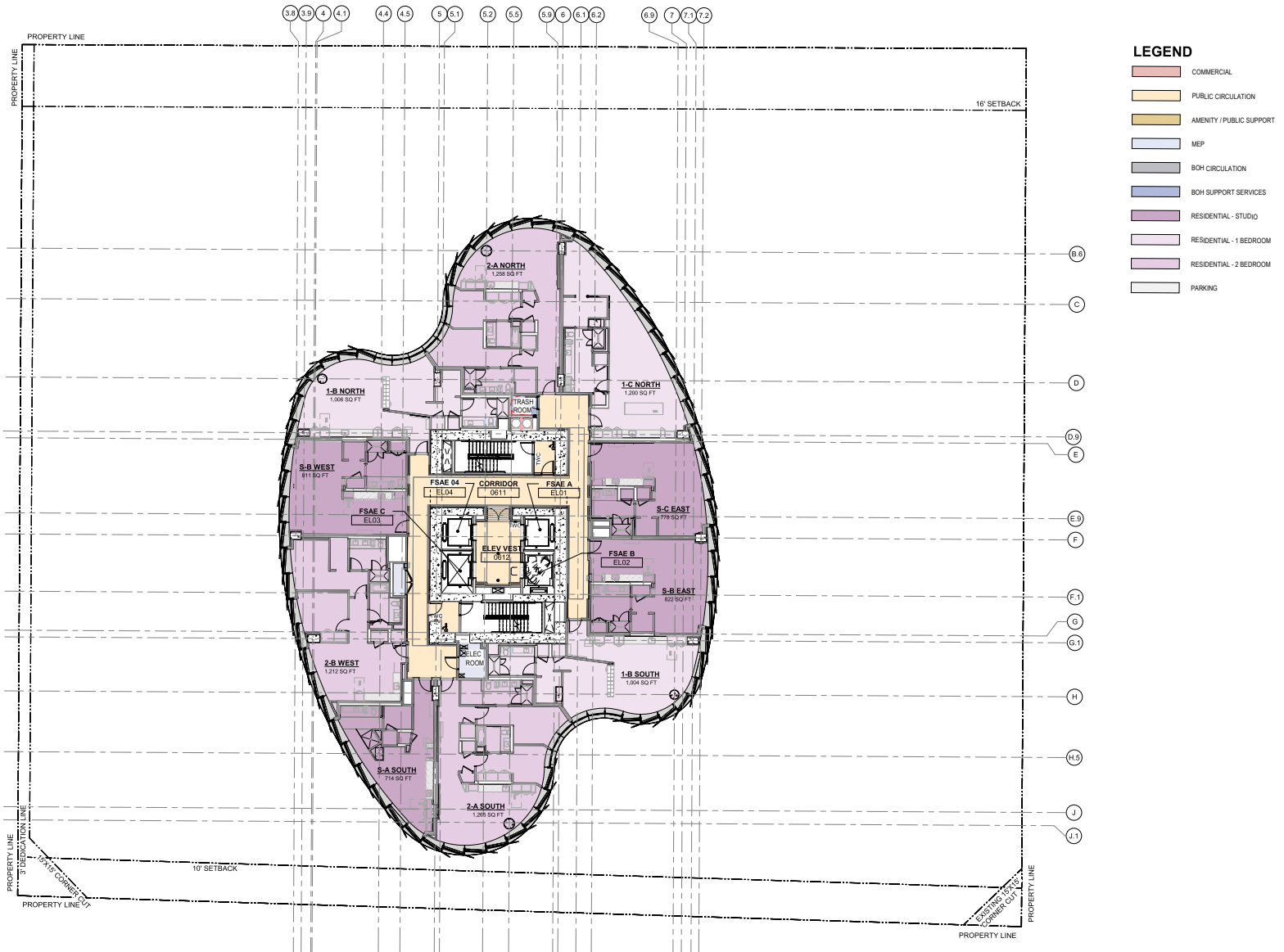
LEGEND

- COMMERCIAL
- PUBLIC CIRCULATION
- AMENITY / PUBLIC SUPPORT
- MEP
- BOH CIRCULATION
- BOH SUPPORT SERVICES
- RESIDENTIAL - STUDIO
- RESIDENTIAL - 1 BEDROOM
- RESIDENTIAL - 2 BEDROOM
- PARKING



0 10 20
 Scale (Feet)

Figure 3-5
 Level 4 (Podium) Floor Plan



LEGEND

[Pink Box]	COMMERCIAL
[Yellow Box]	PUBLIC CIRCULATION
[Light Green Box]	AMENITY / PUBLIC SUPPORT
[Light Blue Box]	MEP
[Dark Blue Box]	BOH CIRCULATION
[Light Purple Box]	BOH SUPPORT SERVICES
[Medium Purple Box]	RESIDENTIAL - STUDIO
[Light Pink Box]	RESIDENTIAL - 1 BEDROOM
[Light Blue Box]	RESIDENTIAL - 2 BEDROOM
[White Box with Border]	PARKING

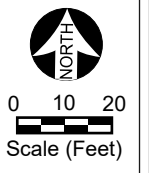


Figure 3-6
Typical Tower Floor Plan

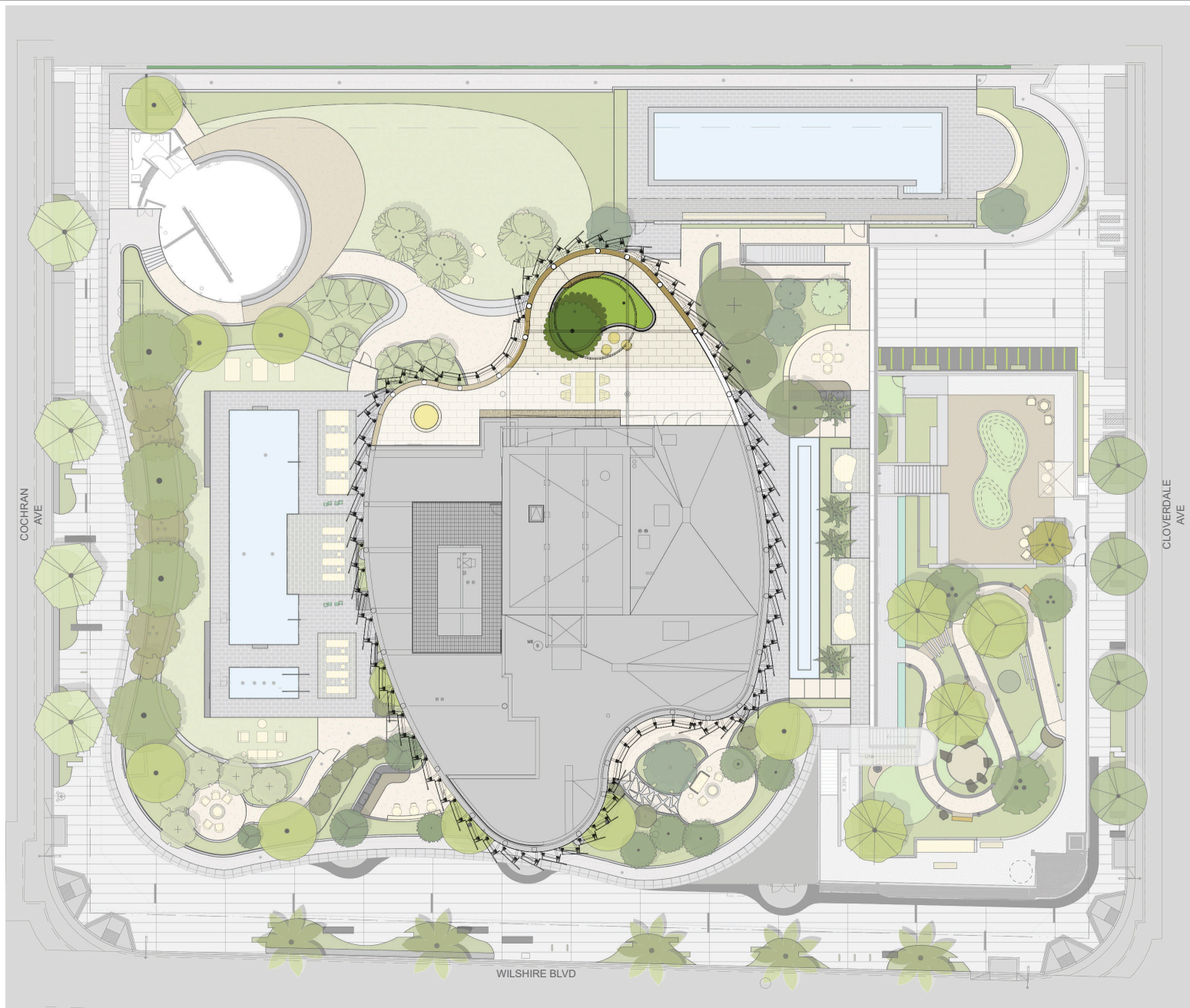
Source: Keating, 2022.



Figure 3-7
Wilshire Elevation







NOTE: Plants and trees represented in renderings represent sizes at maturity and not at installation.

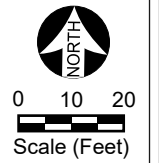


Figure 3-10
Composite Landscape Plan



AERIAL VIEW (LOOKING WEST)

Source: Keating, 2021.

Figure 3-11
Perspective View



STREET VIEW - WILSHIRE BLVD. (LOOKING EAST)



STREET VIEW - WILSHIRE BLVD. (LOOKING WEST)

Figure 3-12
Additional Perspective Views

COCHRAN AVE

CLOVERDALE AVE

WILSHIRE BLVD

Sign Type	Description
101	Secondary Building Identification
102	Entrance Identification
104	Building Address Numerals
105	Leasing ID
107	Parking Totem
110	Residential Parking ID
112	Retail Parking ID
400.1	Primary Retail Tenant ID - Option A
400.2	Primary Retail Tenant ID - Option B
401.1	Primary Restaurant Tenant ID - Option A
401.2	Primary Restaurant Tenant ID - Option B
401.3	Primary Restaurant Tenant ID - Option C
401.4	Primary Restaurant Tenant ID - Option D
401.5	Primary Restaurant Tenant ID - Option E
402	Primary Bar/Coffee Bar Tenant ID
403	Pedestrian Sign
404.1	Awning Sign, Restaurant - Option A
404.2	Awning Sign, Restaurant - Option B
405	Awning Sign, Bar
406	Retail Address Numerals
407	Window Signage

Key

- 000 Sign location
- 000 Illuminated sign location



Figure 3-13
Sign Location Plan

Source: Keating, 2022.

4 SCEIR FINDINGS AND CONSISTENCY ANALYSIS

As discussed in Section 1, Introduction, a SCEIR may be prepared for a project that: (a) is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy (see Public Resources Code Section 21155(a) and (b) is a “transit priority project” (as defined in Public Resources Code Section 21155(b)). As further described below, the Project meets these criteria and thus, qualifies for certain CEQA streamlining benefits by way of preparing a SCEIR for purposes of compliance with CEQA. Specifically, Section 21155(b) applies to a project that:

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which CARB has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas emission reduction targets established by CARB;
2. Is a Transit Priority Project meeting the following criteria:
 - a. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
 - b. Provides a minimum net density of at least 20 units per acre; and
 - c. Is located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

As described previously, SCAG is the metropolitan planning organization for the Project Site area, and in that capacity bears the responsibility under SB 375 to implement and administer RTPs and SCSs for purposes of achieving the goals for reducing greenhouse gases as envisioned by AB 32. The applicable sustainable communities strategy relevant to the region including the Project Site is SCAG’s 2020-2045 RTP/SCS, which is a long-range visioning plan for the six-county SCAG region, that highlights the existing land use and transportation conditions throughout the SCAG region and forecasts how it will meet the region’s transportation needs between 2020 and 2045, as well as achieve CARB’s GHG emissions reduction targets. Specifically, the 2020-2045 RTP/SCS identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as aviation ground access. It also includes a set of visions, goals, objectives, policies and performance measures developed through public and stakeholder outreach sessions across SCAG’s region. On May 7, 2020, SCAG’s Regional Council certified the Program EIR prepared for the 2020-2045 RTP/SCS, and on September 3, 2020, SCAG’s Regional Council

formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emissions reduction target.

Consistency with Criterion #1 – The Project is consistent with the general use designation, density, and building intensity and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy.

Consistency with RTP/SCS Land Use, Density and Intensity

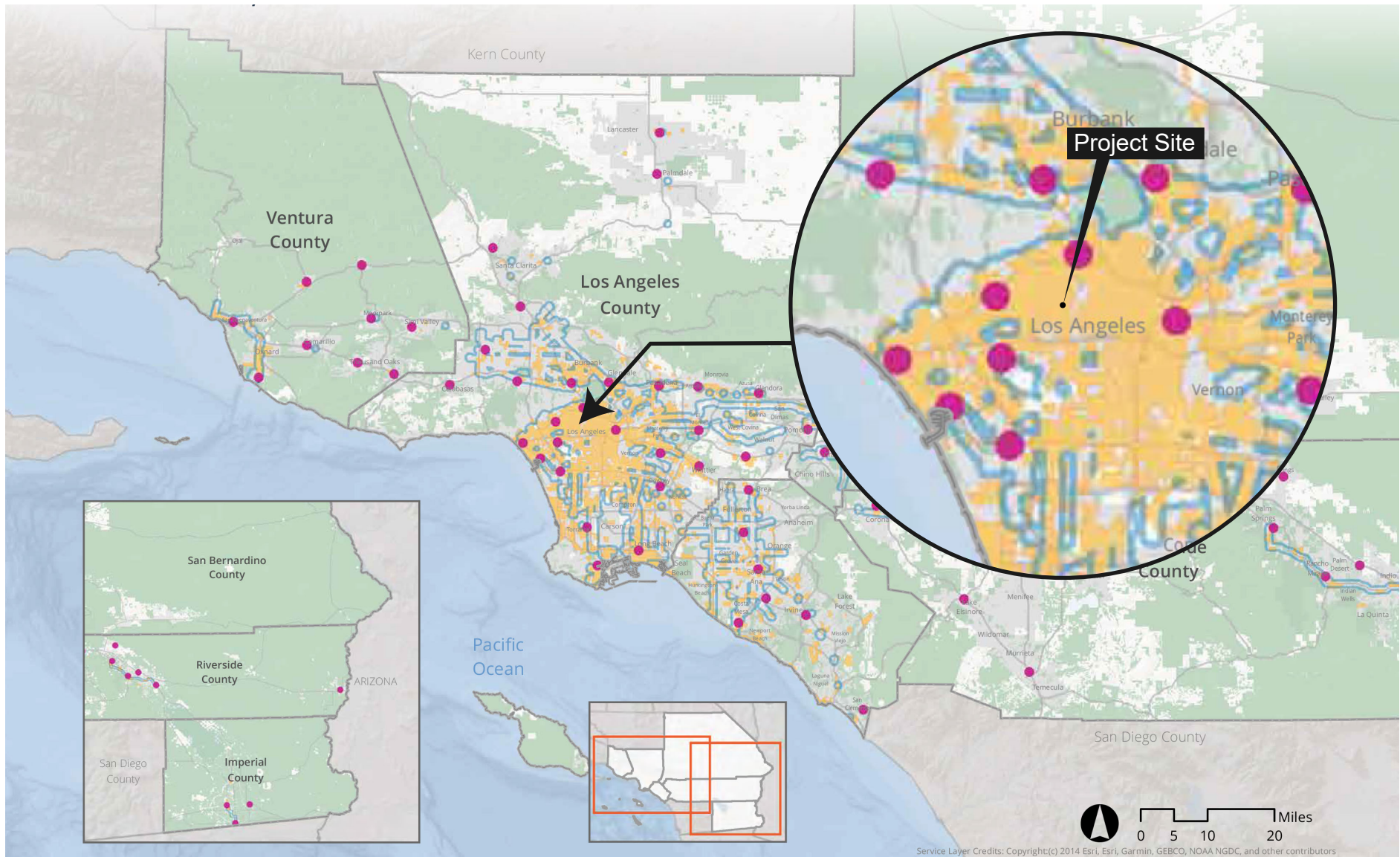
The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices aimed at triggering reduced dependence on automobiles and increased growth in walkable, mixed-use communities and High Quality Transit Areas (HQTAs), and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. As a land use tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where these land use strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas, High Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence. These PGAs account for only four percent of region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.¹²

The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.4 through 3.10, which are included in this Initial Study as Figures 4-1 through 4-7. As shown on the figures, the Project Site is located near a Job Center, within the boundaries of an HQTA, Transit Priority Area, and a Neighborhood Mobility Area, and along a Livable Corridor. (The Project Site is not within a Sphere of Influence.) The Project would include housing and neighborhood-serving commercial uses on an infill site near transit and employment, services, cultural uses, and shopping centers. The Project Site is located within specifically designated areas identified in the 2020-2045 RTP/SCS as PGAs, and the Project would increase housing supply in the Project area. The Project would also increase housing diversity and affordability in the PGA in which the Project Site is located. Of the Project's 348 proposed dwelling units, 29 units would be set aside for rental to households qualifying at the Very Low Income level. Given the urban nature of the Project Site area, Project residents and employees would be able to walk and bike to work and to shop. In addition, the Project Site's location near transit (bus and the future Metro D Line) would further reduce dependence on

¹² Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Southern California Association of Governments, adopted September 3, 2020, page 50.

automobile travel. The Project would provide sidewalks that meet City requirements. Specifically, a 13-foot sidewalk is required for Cochran Avenue and the Project proposes a 13-foot sidewalk. While a 12-foot sidewalk is required for Cloverdale Avenue, no additional dedications to provide a wider sidewalk along Cloverdale Avenue are required pursuant to LAMC Section 12.37 A.5. This is because the Cloverdale Avenue roadway is improved to two feet more than its required width. Accordingly, the existing 10-foot sidewalk would remain. Finally, while a 15-foot sidewalk is required along Wilshire Boulevard, the existing 10-foot sidewalk would remain because the Wilshire Boulevard roadway is improved to five feet more than its required width. Accordingly, no additional dedications are required along Wilshire Boulevard to provide a wider sidewalk, again pursuant to LAMC Section 12.37 A.5. However, the Project would provide varying stepbacks along Wilshire Boulevard, between 10 and 21 feet, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas.

Finally, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation. This type of transit-oriented mixed-use project helps reduce both dependence on automobile travel and mobile-source GHG emissions. Thus, the Project is consistent with SCAG's land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the general use, density, and intensity as contained in the 2020-2045 RTP/SCS.



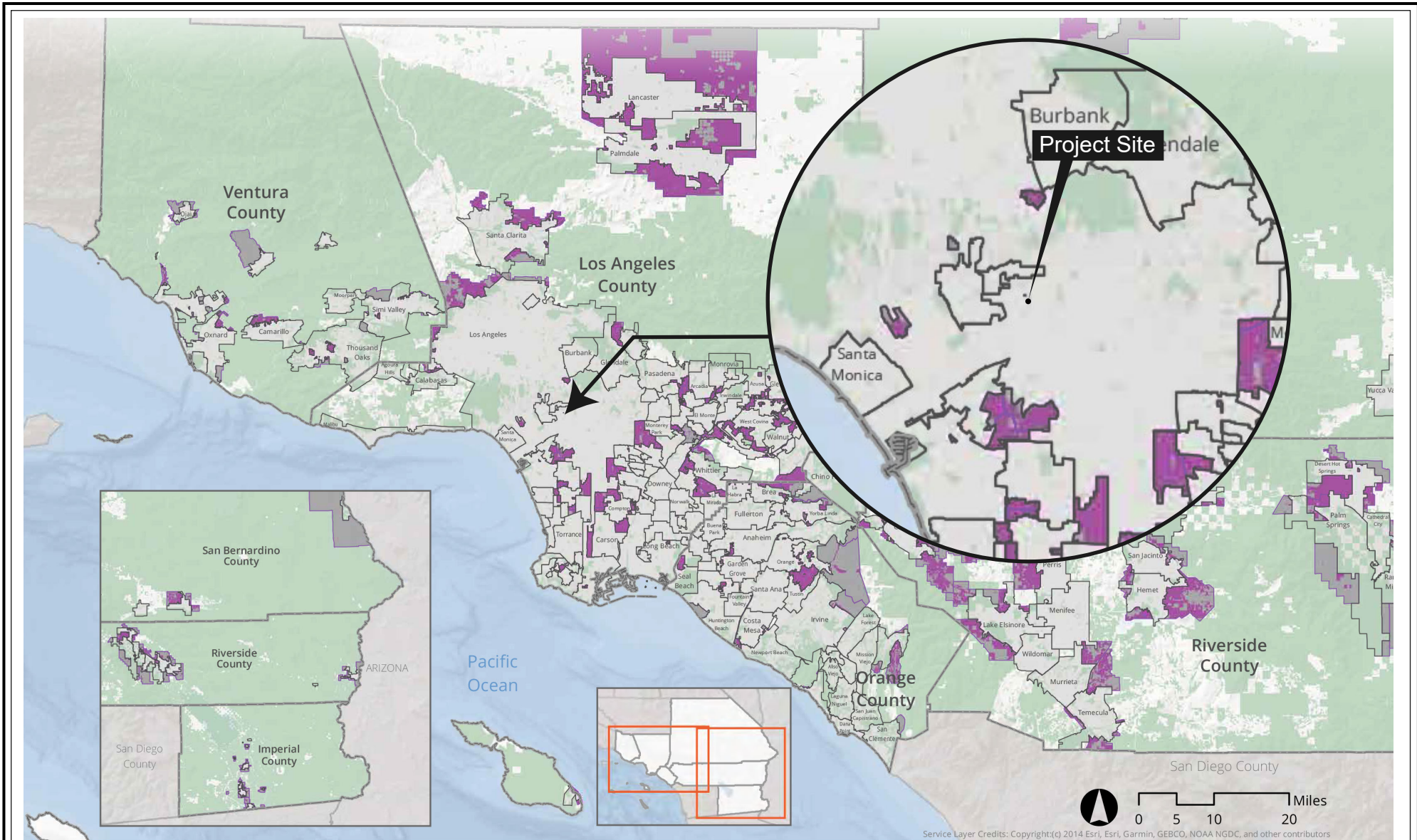
Priority Growth Areas vs. Regional Growth Constraints

- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Note: SCAG used locally informed data elements to determine Regional Growth Constraints such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details.

Figure 4-1
Priority Growth Areas & Regional Growth Constraints

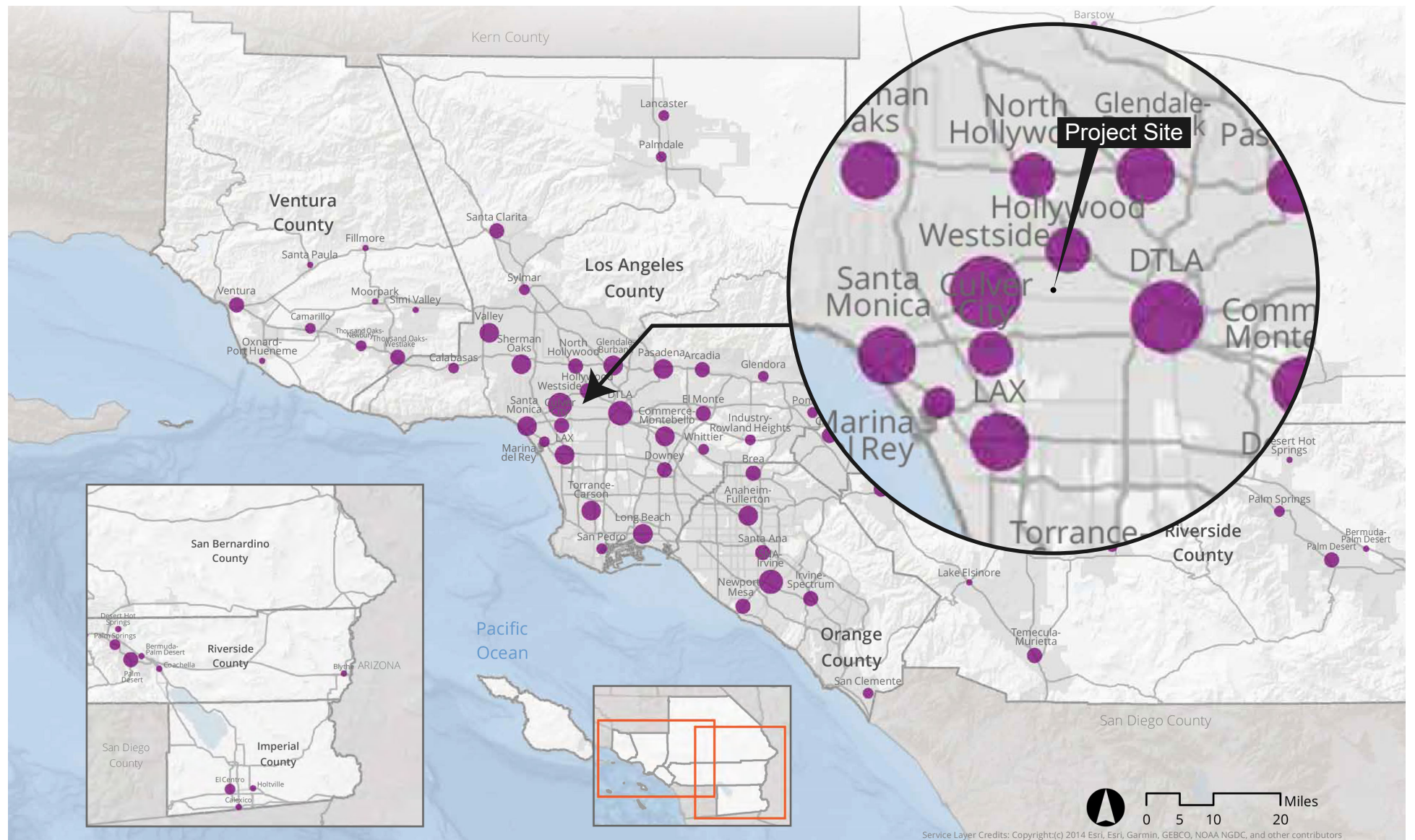


County Boundaries
 Sphere of Influence
 City Boundaries
 Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details.

Source: Counties and local jurisdictions LAFCO in SCAG region, 2018

Figure 4-2
Priority Growth Areas - Spheres of Influence



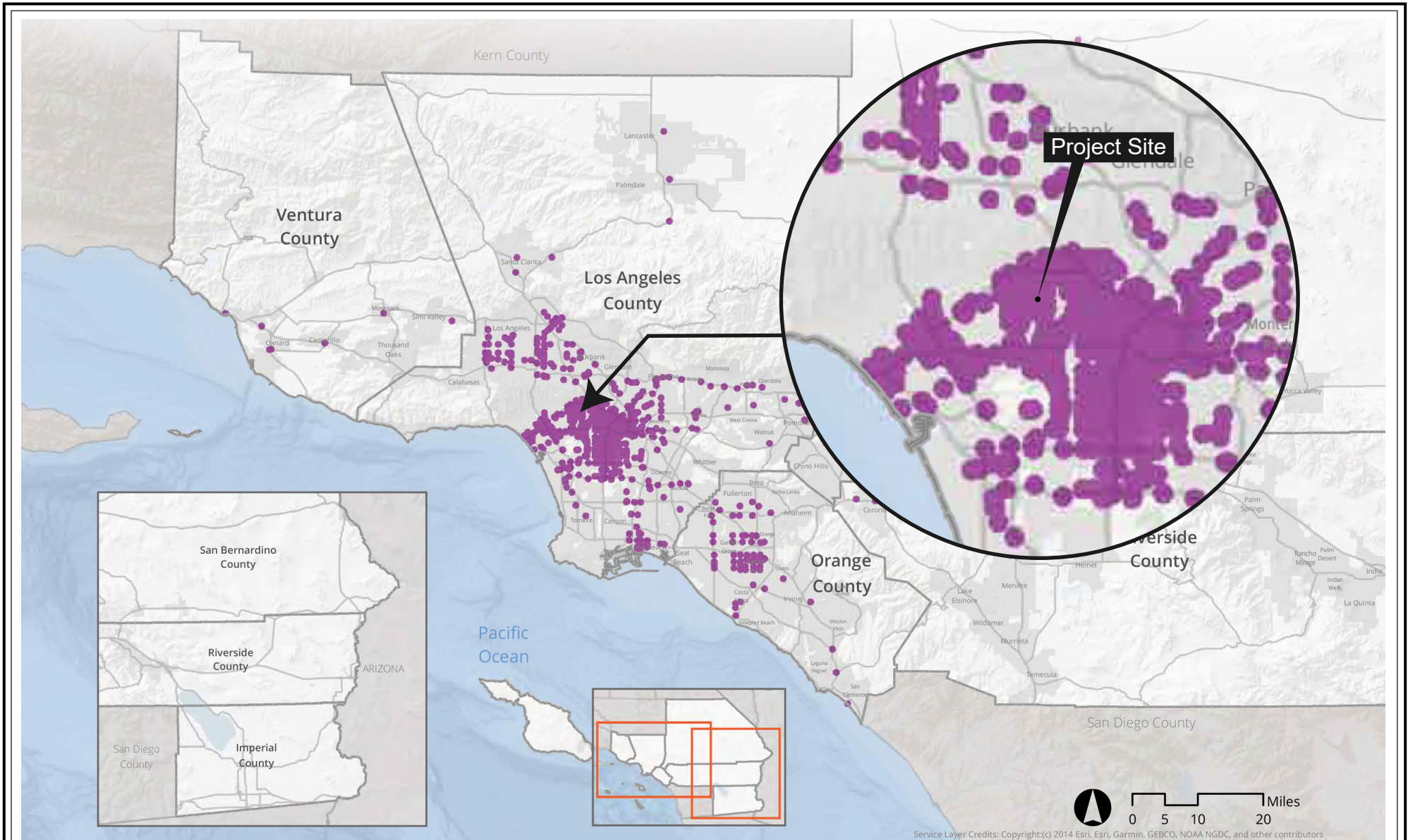
SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Source: SCAG, 2019

Notes:

- (1) Centers are areas with denser employment than their surroundings.
- (2) Dots represent the total employment in each center, not center boundaries.
- (3) Names are intended to be illustrative and may not reflect all the jurisdictions in which a center fully lies.

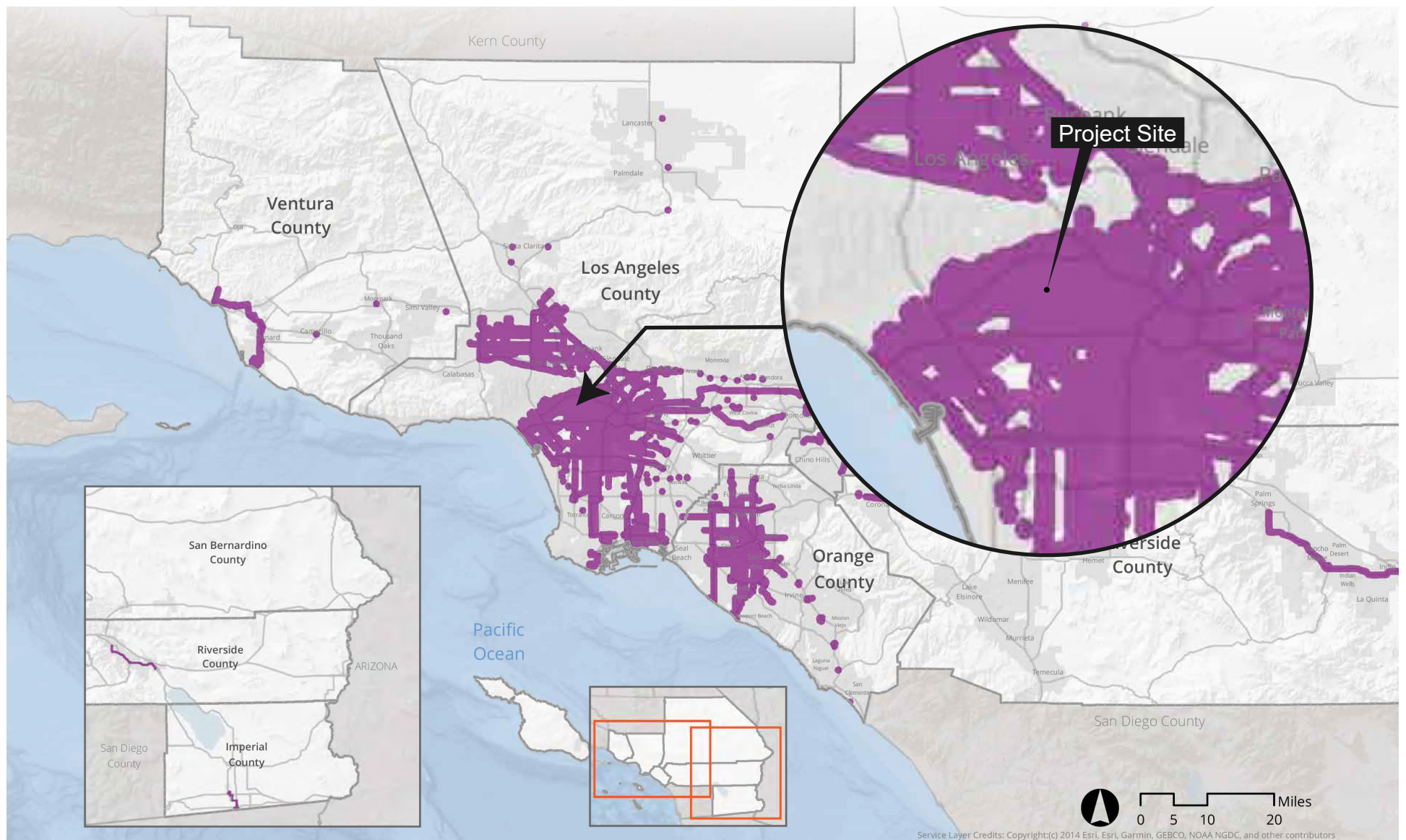


Transit Priority Areas (2045)

■ TPA

Source: County Transportation Commissions, SCAG, 2019

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

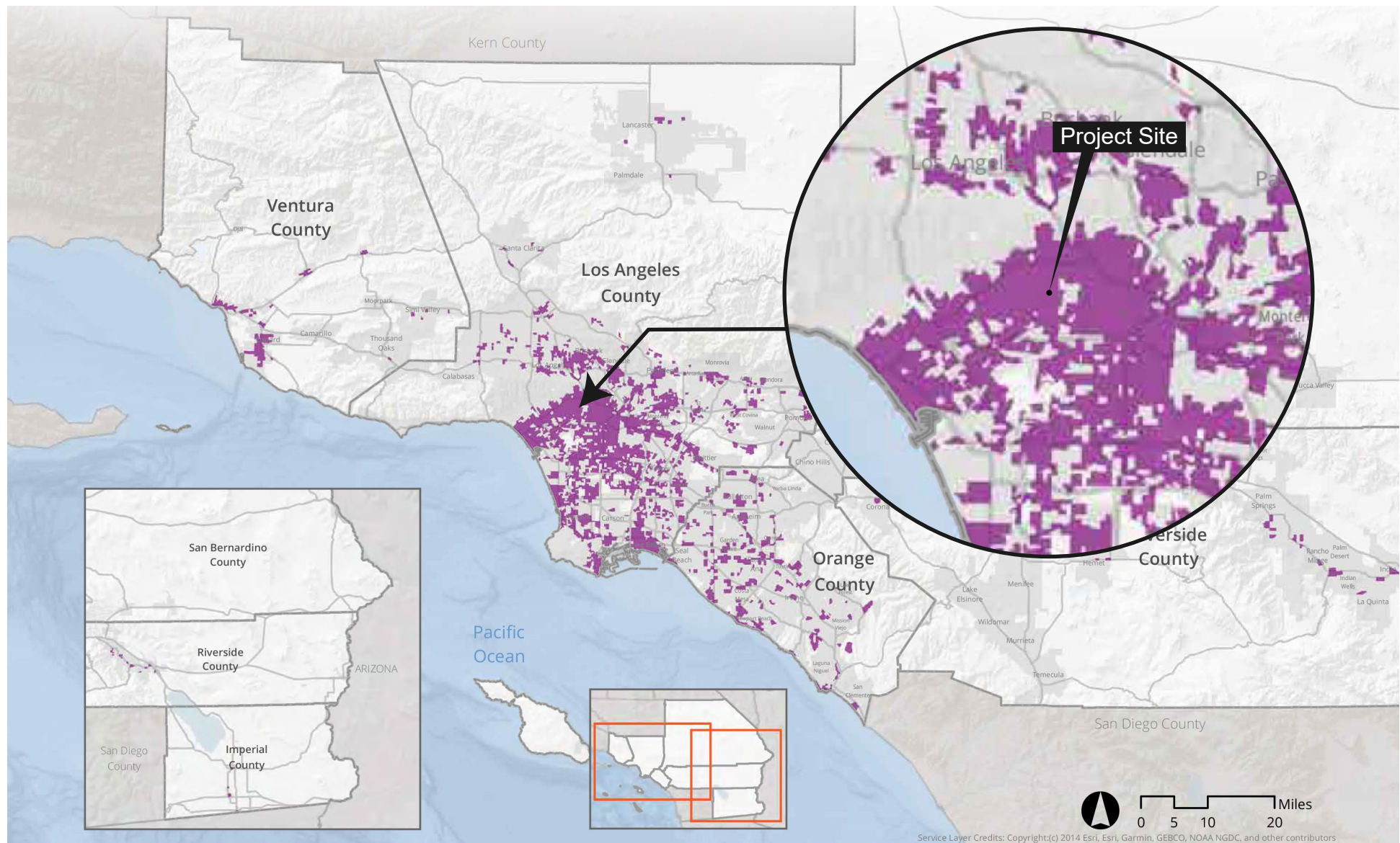


High Quality Transit Areas (2045)

■ HQTA

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTAs using the methodology described in the Transit Technical Report. Major transit stops and HQTAs are extracted from 2045 plan year data of Connect SoCal.

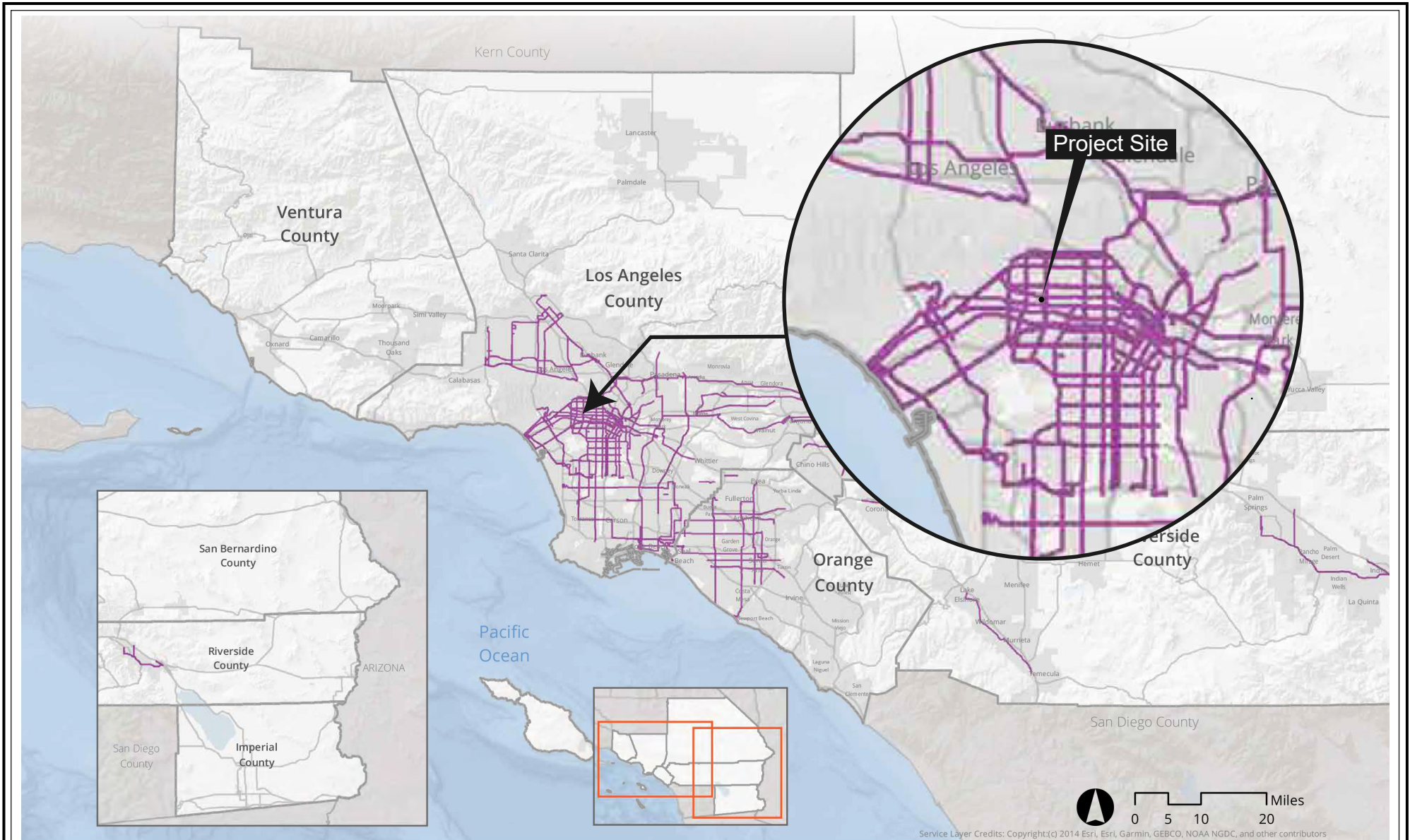


Neighborhood Mobility Areas (NMA)

■ NMA

Source: SCAG, 2019

Note: Neighborhood Mobility Areas (NMA) were identified by analyzing and assigning z-scores four measures at the Tier 2 TAZ level, and subsequently summing the z-scores. TAZs that scored at the 80th percentile or higher for the composite score were considered NMAs.



Livable Corridors

— Livable Corridors

Source: SCAG, 2019

Source: Connect SoCal, May 2020.

Figure 4-7
Priority Growth Areas - Livable Corridors

Consistency with Applicable RTP/SCS Goals and Strategies

As discussed below in Table 4-1, the Project would be substantially consistent with the applicable goals of SCAG’s 2020-2045 RTP/SCS. While the 2020-2045 RTP/SCS also includes guiding principles, these are directed towards SCAG and other jurisdictions and would not be applicable to the Project. Additionally, as discussed in Table 4-2, the Project would be substantially consistent with the applicable land use strategies of SCAG’s 2020-2045 RTP/SCS. There are some land use strategies that are directed towards SCAG and other jurisdictions. As these strategies would not be applicable to the Project, they have not been included in Table 4-2.

**Table 4-1
Consistency with the 2020-2045 RTP/SCS: Goals**

Goals	Consistency Assessment
<p>Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.</p>	<p>No Conflict. The Project Site is located in a highly urbanized area in the City and would develop 348 multi-family residential units and approximately 12,821 square feet of commercial land uses within an HQTAs, as defined by SCAG, and within a transit priority area as defined by SB 743, and also in close proximity to existing and proposed residences and commercial areas. Also, the Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site in accordance with City standards and ensuring safe vehicular and pedestrian access. Furthermore, the Project would be subject to the plan review requirements of the City and would be required to coordinate with the Department of Building and Safety, the Los Angeles Fire Department, and Los Angeles Department of Transportation to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would not conflict with or inhibit the improvement of mobility, accessibility, reliability and travel safety for people and goods.</p>
<p>Goal 4 Increase person and goods movement and travel choices within the transportation system.</p>	<p>No Conflict. The Project would construct housing and neighborhood-serving commercial uses near other commercial and office uses. Therefore, Project residents and employees would be able to walk and bike to work and to shop. The Project Site’s location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions and would increase person movement and travel choices within the</p>

**Table 4-1
Consistency with the 2020-2045 RTP/SCS: Goals**

Goals	Consistency Assessment
	<p>transportation system. Finally, as discussed later in this Initial Study under “Transportation,” the Project would comply with the City’s Transportation Demand Management (TDM) Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project and surrounding area.</p> <p>The Project would also provide sidewalks that meet City requirements, with additional stepbacks, between 10 and 21 feet, along Wilshire Boulevard, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas. The provision of ground floor commercial spaces, including outdoor dining spaces, would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation, thereby increasing person movement and travel choices.</p>
<p>Goal 5 Reduce greenhouse gas emissions and improve air quality.</p>	<p>No Conflict. The Project would construct housing and neighborhood-serving commercial uses near other commercial and office uses. Therefore, Project residents and employees would be able to walk and bike to work and to shop. The Project Site’s location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant and GHG emissions. Finally, as discussed later in this Initial Study under “Transportation,” the Project would comply with the City’s TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project and surrounding area. These TDM measures would further reduce</p>

**Table 4-1
Consistency with the 2020-2045 RTP/SCS: Goals**

Goals	Consistency Assessment
	<p>dependence on automobile travel, reducing VMT and associated pollutant and GHG emissions.</p> <p>The Project would also provide sidewalks that meet City requirements, with additional stepbacks, between 10 and 21 feet, along Wilshire Boulevard, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas. The provision of ground floor commercial spaces, including outdoor dining spaces, would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation and reduce mobile-source GHG and other pollutant emissions.</p>
<p>Goal 6 Support healthy and equitable communities.</p>	<p>No Conflict. The Project would construct housing and neighborhood-serving commercial uses near other commercial and office uses and add to housing diversity. Of the 348 proposed dwelling units, 29 of the units would be set aside for rental to households qualifying at the Very Low Income level. Given the urban nature of the Project Site area, Project residents and employees would be able to walk and bike to work and to shop. In addition, the Project Site’s location near robust transit opportunities (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.</p> <p>The Project would also provide sidewalks that meet City requirements, with additional stepbacks, between 10 and 21 feet, along Wilshire Boulevard, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas. Finally, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of exercise and transportation. Based on the above, the Project would support and would not conflict with this goal of healthy and equitable</p>

**Table 4-1
Consistency with the 2020-2045 RTP/SCS: Goals**

Goals	Consistency Assessment
	communities.
<p>Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p>No Conflict. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes 200 bicycle parking spaces. This type of transit-oriented mixed-use project helps to support an integrated regional development pattern and transportation network, and would reduce dependence on automobile travel and to reduce mobile-source GHG emissions.</p> <p>The Project Site’s location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant and GHG emissions. Finally, as discussed later in this Initial Study under “Transportation,” the Project would comply with the City’s TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project and surrounding area. These TDM measures would further reduce dependence on automobile travel, reducing VMT and associated pollutant and GHG emissions.</p>
<p>Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p>No Conflict. The Project includes development of 348 residential units, in addition to 12,821 square feet of ground floor commercial uses. Of the 348 proposed units, 29 of the units would be set aside for rental to households qualifying at the Very Low Income level. In addition, the Project would provide units in a mix of unit types, thereby providing a diversity of housing types for varying income levels in any area that is supported by multiple transportation options.</p>
<p>Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p>No Conflict. The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.</p>
<p>Source: Connect SoCal.</p>	

**Table 4-2
Consistency with the 2020-2045 RTP/SCS: Strategies**

Strategies	Consistency Assessment
<i>Focus Growth Near Destinations & Mobility Options</i>	
<p>Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.</p>	<p>No Conflict. The Project would build on land use patterns identified in the General Plan Framework Element, as well as the Wilshire Community Plan by locating a high-rise mixed-use building in an area identified for such development. The Project would further emphasize these land use patterns by its proposed utilization of State Density Bonus law, allowing for a greater provision of housing units and floor area ratio in exchange for setting aside a portion of the total units as affordable units. The Project Site’s location adjacent to employment, shopping, and cultural centers would facilitate walking or biking trips to these destinations, while providing more housing in an area identified by the General Plan Framework Element as a Regional Center. The Project Site’s location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, thus facilitating multi-modal access to work, educational, and other destinations. Finally, as discussed later in this Initial Study under “Transportation,” the Project would comply with the City’s TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project and surrounding area.</p> <p>The Project would also provide sidewalks that meet City requirements, with additional setbacks, between 10 and 21 feet, along Wilshire Boulevard, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas. Also, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation. Project users would therefore have multiple sources of access to local destinations.</p>

**Table 4-2
Consistency with the 2020-2045 RTP/SCS: Strategies**

Strategies	Consistency Assessment
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	No Conflict. The Project includes development of mixed residential and commercial uses on an infill site in an area undersupplied for housing, that is near several sources of transit. Also, the Project includes 200 bicycle parking spaces. This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce commute times.
Plan for growth near transit investments and support implementation of first/last mile strategies.	No Conflict. The Project would not preclude the City from planning for growth near transit investments nor implementation of first/last mile strategies. The Project includes both residential and commercial uses in an area currently designated for such growth, directly adjacent to a currently under construction transit line, and generally comporting with planned growth in an area designated as Regional Center by the Community Plan and the General Plan Framework Element.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	No Conflict. The Project includes development of mixed residential and commercial uses on an infill site, which is currently developed with low-rise retail uses, in an urbanized area of the City that is near several sources of transit, including the future Metro D line. Also, the Project includes 200 bicycle parking spaces. Therefore, the Project would redevelop a site that contains outmoded retail uses.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	No Conflict. The Project would build on land use patterns identified in the General Plan Framework Element, as well as Wilshire Community Plan by locating a high-rise mixed-use building in an area identified for such development but currently developed with low scale commercial uses. The Project would further emphasize these land use patterns by its proposed utilization of State Density Bonus law, allowing for a greater provision of housing units and floor area ratio in exchange for setting aside a portion of the total units as affordable units. The Project Site's location adjacent to employment, shopping, and cultural centers would facilitate walking or biking trips to these destinations, increasing amenities and

**Table 4-2
Consistency with the 2020-2045 RTP/SCS: Strategies**

Strategies	Consistency Assessment
	connectivity in an existing neighborhood while providing more housing in an area identified by the General Plan Framework Element as a Regional Center.
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).	No Conflict. The Project includes development of mixed residential and commercial uses on an infill site, which is currently developed with retail uses, in an urbanized area of the City that is near several sources of transit, including the future Metro D line. Also, the Project includes 200 bicycle parking spaces. This type of transit-oriented mixed-use project supports growth near transit as a way to reduce reliance on the automobile, VMT, and associated pollutant emissions.
Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	No Conflict. The Project would not affect any existing affordable housing. In addition, the Project would provide 29 additional units set aside for rental to households qualifying at the Very Low Income level.
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 dedicated lanes, charging and parking/drop-off space.	No Conflict. The Project would include 200 bicycle parking spaces and would provide EV parking in accordance with Code requirements. As discussed below under “Transportation,” the Project would include TDM measures, such as the use of “passive” marketing and promotional tools, such as information kiosks, posters, website, and/or other similar displays containing route maps and schedules for public transit and other transportation alternatives serving the Project and surrounding area. In addition, the Project would comply with all applicable requirements of the City’s TDM Ordinance.
Promote a Green Region	
Preserve, enhance and restore regional wildlife connectivity.	No Conflict. The Project is an infill development in an urbanized area and would not interfere with regional wildlife connectivity.

**Table 4-2
Consistency with the 2020-2045 RTP/SCS: Strategies**

Strategies	Consistency Assessment
Reduce consumption of resource areas, including agricultural land.	No Conflict. The Project is an infill development in an urbanized area would not affect any agricultural land.
Identify ways to improve access to public park space.	No Conflict. The Project is an infill development in an urbanized area would not interfere with access to public park space.
Source: Connect SoCal.	

Consistency with TPP Criterion #2(a) – The Project contains at least 50 percent residential use.

Criterion 2(a) requires that a project "Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75."

The Project includes the construction of 476,777 square feet of floor area, and based on total square footage, the Project contains approximately 97 percent residential uses. In addition, the FAR for the Project is 8.31:1. As such, the Project would be consistent with this criterion.

Consistency with TPP Criterion #2(b) – The Project includes a minimum net density of at least 20 units per acre.

Criterion 2(b) requires that a project "Provides a minimum net density of at least 20 units per acre." The proposed density of the Project is approximately 266 residential dwelling units per acre (348 units on 1.31 acres). As such, the Project would be consistent with this criterion.

Consistency with TPP Criterion #2(c) – The Project Site is located within one-half mile of a major transit stop or a high quality transit corridor included in the 2020-2045 RTP/SCS.

Criterion 2(c) requires that a project "Is located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

PRC Section 21064.3 defines "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.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

Public Resources Code (PRC) Section 21155 (b) defines a “high-quality transit corridor” (HQTC) as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The Project meets both of the definitions to qualify for this criterion, as the Project Site is within one-half mile of a major transit stop and along a high quality transit corridor. The Project Site is located in an urban area served by multiple local bus lines that are adjacent to the Project Site and with service intervals of 15 minute or less during morning and afternoon peak commute periods. Specifically, the Project Site is directly served by Metro Rapid Bus Line 720, which provides stops in both directions of travel along Wilshire Boulevard at the site-adjacent intersection with Cloverdale Avenue, with headways of about five to 10 minutes in both directions throughout the day. Further, according to the 2020-2045 RTP/SCS, the Project Site is located within an HQTA.

In addition, Metro is currently constructing the extension of the D Line subway system from its existing western terminus near Wilshire Boulevard and Western Avenue into the Westwood community of the City of Los Angeles near the Veterans Administration (VA) Hospital campus. The first phase of construction, extending the D Line through the immediate Project area to near the intersection of Wilshire Boulevard and La Cienega Boulevard, would include a new station accessed at the northwest corner of Wilshire Boulevard and La Brea Avenue, located about two blocks directly east of, and on the same side of the street as, the Project. The proposed Wilshire/La Brea station is scheduled to open in 2024. Upon station completion, the Project would also be located within one-half mile of a major transit stop.

5 MITIGATION MEASURES FROM PRIOR EIRS

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs.

To comply with PRC Section 21155.2, the City has reviewed all mitigation measures contained in the following EIRs and determined their applicability to the Project: 1) the City's Housing and Safety Element EIR (Table 5-1, below); 2) the SCAG 2020-2045 RTP/SCS Program EIR (Table 5-2, below); 3) the City's Mobility Plan EIR (see Appendix J of this Initial Study); and 4) the Wilshire Community Plan EIR (see Appendix J of this Initial Study). The City's applicability determination based on the analysis contained in Section 6, Environmental Impact Analysis, of this Initial Study.

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
AIR QUALITY	
4.2-2(a) Construction Emissions Reduction	
<p>For discretionary projects that meet the following criteria, prior to project approval, the Applicant shall be required to provide to the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze construction emissions and identify necessary mitigation:</p> <ul style="list-style-type: none"> • Demolition of more than 13,500 square feet of building area; • Greater than 5,000 cubic yards of soil cut/fill; • Greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading. <p>The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> • Off-road diesel-powered construction equipment greater than 50 horsepower shall be certified for either the Tier 4 Final emission standards for CARB In-Use Off-Road Diesel-Fueled Fleets Regulations or the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. • All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT 	<p>No Mitigation Required. This mitigation measure is not incorporated because an Air Quality Impact Analysis has already been prepared for the Project consistent with Mitigation Measure 4.2-2(a) and demonstrates that Project emissions are less than applicable SCAQMD regional and LST thresholds and no mitigation measures are therefore required. See Section 6.III of the Initial Study for a discussion of the Air Quality Impact Analysis and associated technical modeling in Appendix A-1 of this Initial Study. The analysis provided in Section 6.III and in Appendix A-1 assumes compliance with applicable regulations identified by CARB and the South Coast Air Quality Management District, and other agencies to facilitate consistency with plans for attainment of the NAAQS and CAAQS, including the following, as applicable and feasible:</p> <ul style="list-style-type: none"> • The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: <ul style="list-style-type: none"> ○ All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. ○ The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. ○ All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. ○ All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. ○ All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. ○ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>documentation, and ARB or SCAQMD operating permit shall be provided.</p> <ul style="list-style-type: none"> • Vehicle idling shall be limited to five minutes as set forth in the California Code of Regulations, Title 13. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits. • Heavy duty diesel-fueled equipment shall use low NOx diesel fuel to the extent that it is available and feasible to use. • Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 grams per brake horsepower-hour of PM and 0.20 grams per brake horsepower-hour of NOx emissions. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and shall make these records available for inspection upon request by the City of Los Angeles or the South Coast Air Quality Management District (SCAQMD). • Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use. • Equipment such as tower cranes and signal boards shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards shall utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible. • Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial 	<ul style="list-style-type: none"> ○ Trucks having no current hauling activity shall not idle but be turned off. • The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). • The Project shall comply with the CARB 2010 model year engine (MYE) phasing program (Truck and Bus Regulation). • In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. • In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. • The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. • The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. <p>Regarding the portion of Mitigation Measure 4.2-2(a) that suggests Tier 4 Final equipment, where available, the analysis contained in Section 6.III, Air Quality, of the Initial Study, and also in the air quality modeling contained in Appendix A-1 of this Initial Study assumes a mix of both Tier 3 and Tier 4 equipment. As the analysis demonstrates that the Project would not result in any significant impacts requiring mitigation, the Project would not be required to use only Tier 4 equipment during construction.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>availability of such equipment will be made by the City prior to issuance of grading or building permits based on applicant provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.</p> <ul style="list-style-type: none"> • Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust. • Construction contractors shall maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer’s specifications shall be kept on-site and made available to LADBS inspectors during inspection. • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction activities shall be discontinued during second-stage smog alerts (when feasible). A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. If infeasible to stop work, i.e., in the instance of a continuous concrete pour, construction activities shall be limited to those activities necessary to complete the immediate job. • For projects where continuous pour activities will extend past the typical construction day: <ul style="list-style-type: none"> ○ Concrete trucks shall have an average capacity of 10 cubic yards to minimize the number of concrete truck trips. ○ Contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by one or more facilities within a driving distance of less than 5 miles per one-way trip or 10 miles round trip where feasible. ○ Contractor shall be required to use alternatively fueled concrete trucks that achieve the same or lower NOx emissions as CNG-fueled concrete trucks to the extent feasible. The level of feasibility/infeasibility shall be approved by the City prior to the beginning of concrete pouring activities. 	<p>Nevertheless, as discussed below, the Project would implement MM 4.2-3, which requires the use of Tier 4 construction equipment or the preparation of a construction health risk assessment.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> During plan check, applicant shall make available to SCAQMD a comprehensive inventory of all of road trucks and concrete trucks to be used for the project, including horsepower rating, engine production year, and certification of the specified equipment. 	
4.2-2(b) Operations Emissions Reduction	
<p>For discretionary projects, prior to project approval, the Applicant shall be required to provide the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze operational emissions and identify necessary mitigation for any discretionary project that would include more than 462 single-family residential units, 612 multi-family residential units, or any equivalent combination thereof. The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> Implementation of a Transportation Demand Management Plan. Installation of additional electric vehicle charging stations Public infrastructure improvements (e.g., bus stop shelter improvements) Carpool or ridesharing programs Subsidized transit costs Unbundled parking costs Bicycle amenities (storage, showers, lockers, etc.) Use of all-electric appliances (i.e., elimination of natural gas service). Use solar or low emission water heaters that exceed Title 24 requirements. Increased walls and attic insulation beyond Title 24 requirements. Property management plan that obligates property manager to use of low-VOC paints and coatings, meeting SCAQMD standards, for property management and required use of electric yard and landscaping equipment, including lawnmowers, leaf-blowers, and chainsaws. 	<p>No Mitigation Required. MM 4.2-2(b) would not be applicable to the Project as the Project includes fewer than 612 multi-family residential units (the Project includes 348 multi-family residential units). In addition, the air quality impact analysis provided in Section 6.III of the Initial Study confirms that the Project's impacts with respect to air quality during operation would be less than significant and no mitigation measures are required.</p>
4.2-3 Construction TAC Reduction Measures	
<p>For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes</p>	<p>Mitigation Incorporated. As discussed in Section 6.III(c) of this Initial Study, and also in the air quality modeling contained in Appendix A-1 of this Initial Study, Project impacts related to exposure of sensitive receptors to substantial pollutant concentrations during Project</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with all mitigation measures in the mitigation plan.</p> <p>Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</p>	<p>construction would be less than significant. However, the Project would implement MM 4.2-3 and would therefore be required to use Tier 4 construction equipment. or prepare a construction health risk assessment.</p>
BIOLOGICAL RESOURCES	
4.3-1(a) Biological Resources Reconnaissance Survey and Reporting	
<p>For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural (e.g., native, virgin) or disturbed but undeveloped (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning, including through consultation with CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors.</p> <p>Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a</p>	<p>No Mitigation Required. As described in greater detail in Section 6.IV of the Initial Study, the Project Site is located in an urbanized area of the City and is developed with commercial uses and surface parking. The Project would not require the incorporation of this mitigation measure for the following reasons:</p> <ul style="list-style-type: none"> • Project impacts related to adverse effects, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, would be less than significant, and no mitigation is required. • The Project Site does not contain any critical habitat or support any species identified or designated 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. • The Project Site does not contain any wetlands, riparian habitats, sensitive natural community or critical habitat or support any species identified or designated as a candidate, sensitive, or

**Table 5-1
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Mitigation Measures	Applicability to the Project
<p>qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.</p>	<p>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.</p> <ul style="list-style-type: none"> The Project Site is not located within a wildlife corridor, nor would the Project interfere with any wildlife movement or result in habitat fragmentation. <p>Additionally, the Project would incorporate the second and third paragraphs of MM 4.3-1(b) as it relates to nesting birds, and with implementation of these subsections of MM 4.3-1(b), Project impacts to nesting and migratory birds would be less than significant.</p>
<p>4.3-1(b) Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification</p>	
<p>For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall be prepared and submitted to DCP and CDFW following construction.</p> <p>Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the</p>	<p>Mitigation Incorporated. The Project would comply with applicable regulatory requirements, which include the MBTA (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Nevertheless, the Project would incorporate the second and third paragraphs of this measure with respect to nesting birds. Implementation of this measure would ensure that impacts with respect to nesting and migratory birds are less than significant.</p> <p>The first paragraph of MM 4.3-1(b) is not incorporated for the reasons discussed above.</p>

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Mitigation Measures	Applicability to the Project
<p>construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist.</p> <p>Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</p>	
<p>4.3-1(c) Focused Surveys for Rare Plants</p> <p>If indicated as appropriate by the biological resources assessment report required in Mitigation Measure 4.3-1(a), focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a</p>	<p>No Mitigation Required. As discussed above, the Project is not required to implement MM 4.3-1(a). Therefore, this mitigation measure would not be applicable to the Project.</p>

**Table 5-1
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Mitigation Measures	Applicability to the Project
<p>five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, and CDFW.</p>	
<p>4.3-1(d) Adaptive Management Plan</p>	
<p>If indicated as appropriate in a reconnaissance, pre-construction or focused survey required in Mitigation Measure 4.3-1(a), (b), or (c) the biologist shall prepare an Adaptive Management Plan for future operations to ensure that operations will not result in impacts to special status species, such as lighting plans, fencing plans, revegetation plans, and/or necessary covenants to ensure property owners maintain their properties in a way to reduce impacts to native species, such as requirements for keeping domestic animals or use of non-native vegetation, and/or education campaigns. Applicants shall prepare necessary documentation and provide adequate assurances to ensure compliance with ongoing operational requirements, including, but not limited to, such measures as filing of covenants, creation of funding mechanism, or provision of bonds.</p>	<p>No Mitigation Required. As discussed above, the Project is not required to implement MM 4.3-1(a). Therefore, this mitigation measure would not be applicable to the Project.</p>
<p>4.3-2(a) Habitat Mitigation and Monitoring Plan</p>	
<p>For discretionary projects that are in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the project approval, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City.</p> <p>The HMMP shall mitigate for impacts to jurisdictional areas via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats, preservation of in-kind habitats, or by a contribution to an in-lieu fee program approved by the City, CDFW (and USACE, RWQCB, if applicable).</p>	<p>No Mitigation Required. As described in greater detail in Section 6.IV of the Initial Study, the Project would not require the incorporation of this mitigation measure for the following reasons:</p> <ul style="list-style-type: none"> • Project impacts related to adverse effects, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, would be less than significant, and no mitigation is required. • The Project Site does not contain any critical habitat or support any species identified or designated 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.

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Mitigation Measures	Applicability to the Project
<p>The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1602 and supporting regulations, prior to issuance of a grading permit for the project. In broad terms, this Program shall at a minimum include:</p> <ul style="list-style-type: none"> • Description of the project/impact and mitigation sites; • Specific objectives; • Success criteria; • Plant palette; • Implementation plan; • Maintenance activities; • Monitoring plan; and • Contingency measures. <p>Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area.</p> <p>The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the HMMP.</p> <p>The HMMP shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the HMMP shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable). Five years after project start, a final report shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable), which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period, and indicate whether the HMMP has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at</p>	<ul style="list-style-type: none"> • The Project Site is located in an urbanized area of the City, is developed with commercial uses and surface parking, and does not contain any wetlands, riparian habitats, sensitive natural community or critical habitat or support any species identified or designated 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.

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Mitigation Measures	Applicability to the Project
<p>least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW (USACE, RWQCB, if applicable).</p>	
<p>4.3-2(b) Protected Tree and Tree Canopy Survey</p>	
<p>For discretionary projects that include the removal of trees, prior to project approval, a tree report and tree replanting plan shall be conducted by a certified arborist to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to the City’s Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees’ resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devices [e.g., increment borers, drills] shall be used). Following the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way.</p> <p>Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of City Planning.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because compliance by the Project with existing City regulatory requirements are equal to or more effective than MM 4.3-2(b). As described in greater detail in Section 6.IV(e), the Project would result in the removal of 11 trees on the Project Site (the Project does not include the removal of any street trees). As discussed in the tree report (included in Appendix B of this Initial Study), none of the trees that would be removed are designated by the City as protected trees. Nonetheless, and if applicable, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Site in conformance with the City’s Urban Forestry Division requirements for Project landscaping and street tree replacement and planting.</p> <p>Prior to the removal of trees located within the public right-of-way, the Project Applicant would be required to obtain approval from the Board of Public Works for the removal and replacement of said trees. Street trees would be required to be removed and replaced as required by the Urban Forestry Division and the Board of Public Works. The landscape plans for the Project shall identify all trees that would be removed. Compliance with the City’s requirements would ensure no significant impacts related to biological resources, in particular trees, would occur.</p>

**Table 5-1
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Mitigation Measures	Applicability to the Project
<p>Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.</p> <p>The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities.</p> <p><i>Pre-Construction</i></p> <ul style="list-style-type: none"> • Fencing: Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed. • Pre-Construction Meeting: A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such. 	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p><i>During-Construction</i></p> <ul style="list-style-type: none"> • Fence Monitoring: The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately. • Equipment Operation and Storage: Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist. • Materials Storage and Disposal: Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil. • Grade Changes: Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond. 	

**Table 5-1
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Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Trenching: Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary. • Erosion Control: Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free. • Inspection: A registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection. <p><i>Post-Construction</i></p> <ul style="list-style-type: none"> • Mulch: The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree 	

**Table 5-1
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Mitigation Measures	Applicability to the Project
<p>is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible.</p> <ul style="list-style-type: none"> • Watering Adjacent Plant Material: All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays. • Monitoring: A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be prepared. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the City. 	
CULTRUAL RESOURCES	
4.4-1(a) Identification of Built-Environment Historical Resources	
<p>For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.</p> <p>The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified.</p> <p>If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:</p>	<p>Mitigation Incorporated. The EIR will include an analysis of Project impacts with respect to historical resources. The analysis contained in the EIR will include a historical resources evaluation, consistent with MM 4.4-1(a).</p>

**Table 5-1
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Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history. • The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects. <p>Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.</p>	
<p>4.4-1(b) Rehabilitation of Historical Resources</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes alteration or addition to a historical resource to allow for its continued use, the integrity of the resource could be undermined such that it would no longer convey the historical associations that make it eligible for listing. To reduce such impacts, a resource may be rehabilitated in conformance with the Secretary’s Standards to allow for continued or new uses while maintaining features that convey the resource’s historical significance. Construction of a project</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(b) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>as it relates to rehabilitation of a historical resource shall be monitored for compliance with the Secretary’s Standards. The construction monitoring shall:</p> <ul style="list-style-type: none"> • Be performed by a professional meeting the Secretary of the Interior’s Professional Qualifications Standards (PQS) for historic architecture with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. • Be performed by the professional at regular intervals during the rehabilitation of the historical resource. The intervals shall include, but not necessarily limited to 50 percent, 90 percent, and 100 percent construction. <p>The monitor shall create a technical memorandum at each interval summarizing the findings, making recommendations as necessary to ensure compliance with the Secretary’s Standards, and documenting construction with digital photographs. Compliance with the Secretary’s Standards shall include the review specifications, tests, and mockups for the treatment of historic building materials.</p> <p>The monitor shall submit the memoranda to City of Los Angeles Office of Historic Resources (OHR) for concurrence. In the event OHR does not concur, all activities shall cease until compliance with the Secretary’s Standards is resolved and concurrence is obtained.</p>	
<p>4.4-1(c) Design Requirements for New Construction</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes new construction on a site containing a historical resource, the project design team shall consult with a preservation architect or other qualified professional to ensure that new construction is designed and constructed in accordance with the Secretary of Interior’s Standards to ensure the proposed new construction would protect the historic integrity of the historical resource and any adjacent historical resources. The final design shall require the approval of OHR. In the event OHR does not concur, all activities shall cease until compliance with the Secretary’s Standards is resolved and concurrence is obtained.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(c) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>
<p>4.4-1(d) Relocation and Rehabilitation of Historical Resources</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will</p>

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Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>For any project for which retention or rehabilitation of a historical resource is not feasible, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation, which would preclude the demolition of a resource by removing it intact to another site. If the study concludes it is feasible to relocate the historical resource, the structure's availability shall be advertised in historic preservation websites such as HistoricForSale, Historic Properties, Old Houses, and Preservation Directory and a local newspaper such as the Los Angeles Times for a period of not less than 60 days by the project applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for History, Architectural History, or Architecture, pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary's Standards. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to its implementation. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on the historical resource. If after three months it is evident that no party is interested in purchasing the historical resource per the mitigation measure stipulated above, then the Historic American Building Survey (HABS) Level II documentation, as described below in Mitigation Measure 4.4-1(e), would be required to document the important history and architecture of the historical resource. Relocation shall not take place until the historical resource is first recorded pursuant to the HABS Level II requirements.</p> <p>Any relocation activities undertaken by third parties shall be fully completed prior to the commencement of construction activities. The relocated historical resource shall be moved in accordance with all applicable regulatory requirements, including those applicable provisions of Chapter 83 of the Los Angeles Building Code, and shall be moved during off-peak hours so as to avoid potential traffic impacts.</p>	<p>address the applicability of MM 4.4-1(d) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
4.4-1(e) Historic American Building Survey Documentation	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If significant historical resources are identified on a development site and avoidance or compliance with the Secretary’s Standards is not possible, prior to development activities, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the historical resource and remaining historic property setting. The HABS document shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior’s PQS for History, Architectural History, or Architecture, pursuant to 36 CFR 61. This document shall record the history and architecture of the property, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated, as appropriate. The property’s physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; original as-built drawings; large format photographs; and written data. Building exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation. The HABS documentation shall be submitted to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the City of Los Angeles Office of Historic Resources (OHR) and Los Angeles Public Library. Per the Secretary of the Interior’s Standards for Architectural and Engineering Documentation, preparation of the HABS document serves to “[provide] important information on a property’s significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties.”²</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(e) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>
4.4-1(f) Interpretive Program	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If avoidance of the historical resource is not feasible, the project shall include an interpretive display located on the property which addresses the historical context</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(f) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>and architectural or historical significance of the resource and informs the public about the history and original configuration of the property. The display shall be reviewed and approved by the City prior to installation at a site to be chosen by the City.</p>	<p>the EIR will include mitigation that is equal to or exceeds this performance standard.</p>
<p>4.4-1(g) Construction Monitoring, Salvage, and Reuse</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If retention of a historical resource is not feasible, and the historical resource is significant for its architectural design or construction method, the project applicant shall retain a qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior’s Professional Qualifications Standards (PQS) for Architectural History to conduct construction monitoring and salvage during demolition. Any important historic fabric associated with the historical resource’s period of significance shall be fully recorded in photographic images and written manuscript notes. Prior to the commencement of demolition, significant material shall be inventoried and evaluated for potential salvage, analysis, reuse, and interpretation. The qualified architectural historian or historic preservation professional shall prepare the necessary written and illustrated documentation in a construction monitoring and salvage report. This document shall record any historically significant construction methods completed during the period of significance as well as document the historical resource’s present physical condition through site plans; historic maps and photographs; sketch maps; digital photography; and written data and text.</p> <p>A salvage and reuse plan shall be created, identifying elements and materials that can be saved prior to the issuance of a demolition permit. The plan shall be prepared by a qualified architectural historian or historic preservation professional with demonstrated experience in developing salvage and reuse plans. The plan shall be submitted to the City of Los Angeles Office of Historic Resources. Elements and materials that may be salvageable include: windows, doors, roof tiles, decorative elements, framing members, light fixtures, plumbing fixtures, and flooring materials such as tiles and hardwood. The salvageable items shall be removed in the gentlest, least destructive manner possible. The plan shall identify the recipient(s) for the items.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(g) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>All documentation components shall be completed in accordance with the Secretary of the Interior’s Standards and for Archaeological Documentation for above ground structures. The completed documentation shall be placed on file at the South Central Coastal Information Center, California State University, Fullerton, California; and the City of Los Angeles Public Library. Findings shall be incorporated into the Historic American Buildings Survey (HABS) report.</p>	
<p>4.4-1(h) Temporary Protective Relocation</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For projects for which development would have the potential to cause damage to a historical resource and the resource cannot be protected in place, if feasible, the resource may be temporarily relocated to prevent such damage. Prior to development, the applicant shall contact stakeholders directly via letter detailing the location of the project site, its potential impact on the resource, project timeframe, identification of the affected resource, proposed procedures for removal resource or parts of resource with affected, where and for how long the resource would be stored, how it would be secured, and other relevant details. Photographic and documentary recordation of the potentially impacted resource shall be completed by a qualified architectural historian meeting the PQS for Architectural History. Prior to any construction or demolition activities that have the potential to damage the resource, elements that cannot be reasonably protected in place shall be carefully removed by a qualified restoration contractor. Each removed element shall be promptly stored at a secured off-site location. Following completion of project construction, reinstallation of each affected element at its original documented location shall occur [by a qualified restoration contractor] with work completed to the satisfaction of the OHR, and the Department of Public Works Bureau of Engineering, and other interested parties. Excavation and construction activities in the vicinity of the resource and work conducted by the restoration contractor to remove, store, and replace affected elements, shall be monitored by a qualified historic preservation consultant meeting the PQS for Architectural History and documented in a monitoring report that shall be provided to OHR.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(h) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>
<p>4.4-1(i) Excavation and Shoring Plan</p>	
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>For projects in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, an excavation and shoring plan shall be implemented to reduce the likelihood that earth-moving activities will result in damage to the historical resource due to earth moving activities. Procedures shall be implemented for shoring system design and monitoring of pre-excavation, grading, and shoring activities:</p> <ul style="list-style-type: none"> Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum allowable lateral deflections for the project site are to be developed by the Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, or other means of reinforcement, that is of sufficient capacity and stiffness to meet or exceed the strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Geotechnical Engineer for conformance with the design intent and submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval during the grading permit application submission. The Geotechnical Engineer shall provide on-site observation during the excavation and shoring work. The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to 	<p>address the applicability of MM 4.4-1(i) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in the EIR will include mitigation that is equal to or exceeds this performance standard.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results.</p> <ul style="list-style-type: none"> • Appropriate parties shall be notified immediately, and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of adjacent historic buildings, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary's Standards, as appropriate. <p>Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Geotechnical Engineer.</p>	
<p>4.4-1(j) Structural Construction Monitoring</p> <p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For developments in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, construction monitoring shall be implemented to minimize damage to nearby historical resources. The</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to historical resources, including a historical resources evaluation consistent with MM 4.4-1(a). Therefore, the EIR will address the applicability of MM 4.4-1(j) to the Project as it relates to historical resources. If necessary, the Project-specific analysis included in</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>construction monitoring shall be performed by a licensed structural engineer with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. A survey of the existing foundations and other structural aspects of historical resources in close proximity to the site shall be conducted to establish baseline conditions and provide a shoring design to protect the historical resources from potential damage. The survey shall take place prior to any construction activities. Pot holing or other destructive testing of the below grade conditions on the development site and immediately adjacent to the nearby historical resources may be necessary to establish baseline conditions and prepare the shoring design. A construction monitor shall submit to OHR a pre-construction survey that establishes baseline conditions to be monitored during construction, prior to issuance of any building permit for the development. The monitoring process shall include a meeting with the project contractor prior to the demolition and/or excavation activities to discuss minimizing damage to historical resources in close proximity.</p>	<p>the EIR will include mitigation that is equal to or exceeds this performance standard.</p>
4.4-2 Archaeological Resources	
<p>Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.</p> <p>A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).</p> <p>B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.</p>	<p>Mitigation Incorporated. Regarding archaeological resources, the Project requires the excavation of the underlying alluvial sediments and the removal of the overlying artificial fill. As described in Section 6.V(b) of the Initial Study, an Archaeological Resources Assessment was prepared for the Project (included in Appendix C of this Initial Study), which included SCCIC and SLF searches. The Archaeological Resources Assessment concluded that the potential for unidentified archaeological resources at the Project Site is found to be low. Nevertheless, the Project would implement MM 4.4-2, which would ensure that Project impacts with respect to archaeological resources would be less than significant.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.</p> <p>D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.</p> <p>E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.</p> <p>F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf).</p> <p>G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.</p> <p>H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to</p>	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.</p> <p>I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p> <p>J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant</p>	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.</p> <p>K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.</p>	
Geology and Soils	
4.5-1(a) Paleontological Procedures for Discretionary Projects	
<p>For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than</p>	<p>Mitigation Incorporated. As described in Section 6.VII(f) of the Initial Study, a Paleontological Resources Technical Report was prepared for the Project (included in Appendix D-3 of this Initial Study), which concluded that the Project Site is located in an area of high paleontological sensitivity. Therefore, the Project would implement MM 4.5-1(a), which would ensure that Project impacts with respect to paleontological resources would be less than significant.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:</p> <ul style="list-style-type: none"> • Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County. • If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment. 	
<p>4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring</p>	
<p>If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.</p>	<p>Mitigation Incorporated. As described in Section 6.VII(f) of the Initial Study, a Paleontological Resources Technical Report was prepared for the Project (included in Appendix D-3 of this Initial Study), which concluded that the Project Site is located in an area of high paleontological sensitivity. Therefore, the Project would implement MM 4.5-1(b), which would ensure that Project impacts with respect to paleontological resources would be less than significant.</p>
<p>4.5-1(c) Construction Monitoring</p>	
<p>If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall</p>	<p>Mitigation Incorporated. As described in Section 6.VII(f) of the Initial Study, a Paleontological Resources Technical Report was prepared for the Project (included in Appendix D-3 of this Initial Study), which concluded that the Project Site is located in an area of high paleontological sensitivity. Therefore, the Project would implement MM 4.5-1(c), which would ensure that Project impacts with respect to paleontological resources would be less than significant.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.	
4.5-1(d) Fossil Discovery, Salvage, and Treatment	
<p>All discretionary projects shall be subject to the following mitigation measure: Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).</p> <p>Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.</p> <p>The requirements in this mitigation measure shall be shown on plans.</p>	<p>Mitigation Incorporated. As described in Section 6.VII(f) of the Initial Study, a Paleontological Resources Technical Report was prepared for the Project (included in Appendix D-3 of this Initial Study), which concluded that the Project Site is located in an area of high paleontological sensitivity. Therefore, the Project would implement MM 4.5-1(d), which would ensure that Project impacts with respect to paleontological resources would be less than significant.</p>
Hazards and Hazardous Materials	
4.7-2a Environmental Site Assessment	
(1) Applicability Threshold. Discretionary projects that require grading, excavation, or building permit from LADBS and which meet the criteria below shall comply with the standard in (2):	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.IX(d) and in the Phase I Environmental Site Assessment (included in Appendix E-1 of this Initial Study), the Project Site is not included on any list compiled pursuant to Government</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Located on or within 500 feet of a Hazardous Material site listed on the following databases: <ul style="list-style-type: none"> • SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov); • DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public); • DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); • LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records); • Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests); • SCAQMD Facility Information Detail (refer to https://xapprod.aqmd.gov/find); or • Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or • Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or • Located on any land currently or previously designated with an industrial use class or industrial zoning; or • Located on land currently or previously used for a gas station or dry-cleaning facility. <p>Or:</p> <ul style="list-style-type: none"> • The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station, or dry-cleaner, or otherwise is contaminated with hazardous substances. <p>And:</p>	<p>Code Section 65962.5. In addition, as discussed in Section 6.IX(b), a Phase II Environmental Site Assessment was prepared based on the Recognized Environmental Conditions identified in the Phase I and is included in Appendix E-2 of this Initial Study. Because VOCs and TPHg were not detected above their respective laboratory reporting limits, the soil vapor at the Project Site does not appear to be impacted by the former adjacent and nearby laundromats/cleaners and gasoline stations/automotive repair facilities. Therefore, no additional assessment pertaining to these issues was recommended in the Phase II, and Project impacts would be less than significant.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or conditions. <p>(2) A Phase I Environmental Site Assessment (ESA) shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.</p> <p>If the Phase I ESA identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I ESA, a Phase II ESA shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II ESAs shall be maintained by the Applicant and Owner and made available for review and inclusion in the case file, as applicable, by the appropriate regulatory agency, such as the SWRCB, DTSC, or LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II ESA or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained by the Applicant and Owner.</p>	
<p>4.7-2b Site Remediation and Health and Safety Plan</p>	
<p>For discretionary projects that require site remediation under MM-HAZ 4.7-2a, if contaminants of concern (COCs) are detected above regulatory action levels, the project applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan (SMP). If the project is under regulatory oversight, the SMP shall be submitted to appropriate agencies (such as SCAQMD, DTSC or others) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities</p>	<p>No Mitigation Required. As discussed above, the Project would not be required to implement MM 4.-2(a). Therefore, this mitigation measure would not be applicable to the Project.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>associated with the project to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows:</p> <ul style="list-style-type: none"> • The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. • During the project's excavation phase, the applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166. • The project applicant shall commission a site-specific Health and Safety Plan (HASP) to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP shall address, as appropriate, safety requirements that will serve to avoid significant impacts or risks to workers or the public. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers involved in the activities associated with the investigation to demonstrate their understanding of the risks of excavation. 	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial action is not required.	
Hydrology and Water Quality	
4.8-1 Drainage Pattern Alterations and Flood Control	
<p>For any development project that the City has determined based on an expert study will impede or redirect flood flows even with compliance with existing regulations and RCMS, the project shall develop and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP) for compliance with the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The purpose of the SWMP, similar to the SWPPP, is to maintain during construction and operations the existing drainage patterns of the site and vicinity to the maximum extent feasible, to avoid downstream impacts associated with flooding or water quality degradation from ground disturbance during construction. To address the potential for long-term drainage pattern alterations associated with the placement of future development projects in areas where no development is currently present, the SWMP must also include operational and maintenance BMPs; such BMPs may include but would not be limited to the upkeep of landscaped/vegetated swales to dissipate stormwater runoff, or the maintenance (dredging and disposal of accumulated materials) of detention basins placed to capture stormwater runoff resulting from the project.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because the existing regulatory requirements listed below as governed by the LARWQCB and the City regarding water quality would apply to the Project and are equal to or more effective than the MM 4.8-1.</p> <p>Specifically, the Project would be required to comply with the following regulatory requirements:</p> <ol style="list-style-type: none"> 1) The NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. 2) During operation, the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
	Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.
Noise	
4.10-1(a) Noise Shielding and Silencing	
For all discretionary projects, power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.	Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(a) to the Project.
4.10-1(b) Use of Driven Pile Systems	
For all discretionary projects, driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.	Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(b) to the Project.
4.10-1(c) Enclosures and Screening	
For all discretionary projects, all outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.	Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(c) to the Project.
4.10-1(d) Construction Staging Areas	
Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.	Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(d) to the Project.
4.10-1(e) Temporary Sound Barriers	
Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans.	Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(e) to the Project.
4.10-1(f) Project-Specific Construction Noise Study	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for discretionary projects in the City located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Two or more subterranean levels or 20,000 cubic yards or more of excavated material; • Construction duration (excluding architectural coatings) of 18 months or more; • Use of large, heavy-duty equipment rated 300 horsepower or greater; or • The potential for impact pile driving. <p>The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, transient lodgings, schools, libraries, churches [or other places of assembly], hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks), and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques may include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.</p> <p>Project Applicants shall be required to comply with all requirements of Mitigation Measures 4.10-1(a) through 4.10-5(e) in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-1(f) to the Project.</p>
<p>4.10-2 Project-Specific Operational Noise Study</p>	
<p>A Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for all discretionary housing developments with roof decks and/or pool decks in the City of Los Angeles concurrent with Design Review and prior to the approval of building permits. The Noise Study shall include:</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM 4.10-2 to the Project.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Description of pertinent noise regulations. • Analysis of operational noise generated by the project's roof decks and/or pool decks to noise-sensitive land uses. • Comparison of noise levels to applicable City thresholds, such as if the project's operational noise would exceed 3 dBA in an unacceptable land use category or 5 dBA in an acceptable land use category per the City's land use compatibility guidelines included in the City of Los Angeles General Plan Noise Element. • If project noise would exceed City thresholds, identification of mitigation measures to reduce noise to below 3dBA in an unacceptable land use category or 5 dBA in an acceptable land use category to the extent feasible. Mitigation measures may include, but would not be limited to, operational restrictions, sound dampening equipment, or sound walls. • Each mitigation measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. • Applicant/owners shall comply with the mitigation plan and include the measures in construction contracts. • Mitigation plan shall be included on plans. 	
<p>4.10-3(a) Vibration Control Plan</p> <p>For construction activity for discretionary projects involving vibratory rollers or sonic pile drivers within 50 feet of an extremely fragile building (non-engineered masonry) or historical resource (designated or in SurveyLA or other City recognized survey), the Applicant shall prepare a Vibration Control Plan. The Vibration Control Plan requirement shall also apply to use of impact pile drivers within 140 feet of extremely fragile buildings or historical resources or residential structures. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:</p> <ul style="list-style-type: none"> • Use of drilled piles or similar method rather than impact pile driving • Use of rubber-tired equipment rather than metal-tracked equipment • Avoiding the use of vibrating equipment when allowed by best engineering practices <p>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected extremely fragile buildings/historical resources. The survey letter shall provide a shoring design to protect the extremely fragile buildings/historical resources from potential damage.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to vibration. Therefore, the EIR will address the applicability of MM 4.10-3(a) to the Project.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the Contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p> <p>A Statement of Compliance, in a form approved by the City, committing the Applicant and Owner to complying with the measure shall be signed by the Applicant and Owner is required to be submitted to the Los Angeles Department of Building and Safety (LADBS) at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request. Vibration Control Plan shall show on the plans.</p>	
4.10-3(b) Vibration Mitigation	
<p>For all discretionary projects:</p> <ul style="list-style-type: none"> Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use. Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. <p>The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices. Requirement to be on plans.</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to vibration. Therefore, the EIR will address the applicability of MM 4.10-3(b) to the Project.</p>
Public Services	
4.12-1(a) Design Plans Review	
<p>For discretionary projects with more than 300 housing units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, prior to the start of construction, design plans shall be submitted to the LAFD that demonstrate the use of construction and design features that reduce fire potential and/or promote containment, including</p>	<p>No Mitigation Required. The Project Site is not located in a VHFHSZ or SRA, but the Project does propose more than 300 housing units (the Project includes the construction of 348 dwelling units). However, there are no unusual site-specific, area, roadway, or Project characteristics that would result in an increased risk of fire. In addition, as discussed in Section 6.XV(a) of the Initial Study, existing facilities are capable of</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>increased spacing between buildings, noncombustible roofs, fire-resistant landscaping, and special irrigation facilities. Design features shall be reviewed and approved by the LAFD prior to project approval.</p> <p>Upon completion of project construction, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the LAFD.</p>	<p>providing acceptable fire protection and emergency response services, and therefore, the Project would not require the need for new or physically altered governmental facilities. Additionally, the Project would be subject to the existing regulations in the LAMC and City's Fire Code. Thus, the Project would not require the need for new or physically altered governmental facilities, the construction of which could result in significant environmental impacts, and no mitigation measures would be required.</p>
4.12-1(b) Emergency Access	
<p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, during demolition and construction of discretionary projects, access roads and alleyways shall remain clear and unobstructed in order to ensure access for emergency vehicles. If road closures during construction are necessary, prior to the issuance of a building permit for the discretionary project, a detailed Construction Management Plan including street closure information, a detour plan, haul routes, and a staging plan, shall be prepared and submitted to the Los Angeles Fire Department and the Los Angeles Department of Transportation for review and approval.</p> <p>Furthermore, if emergency access gates are provided on a project access road, the gates shall be equipped with approved locking devices for both Los Angeles City and County Fire Departments on both sides of the gate. Signs shall be provided on the project access road.</p>	<p>No Mitigation Required. The Project Site is not located in a VHFHSZ or SRA, but the Project does propose more than 300 housing units (the Project includes the construction of 348 dwelling units). However, there are no unusual site-specific, area, roadway, or Project characteristics that would result in an increased risk to emergency access. In addition, as discussed in Section 6.IX(f) of the Initial Study, the Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements, which would ensure that the Project would not impede emergency access within the Project Site or vicinity. In addition, as discussed in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would be required to implement a Construction Work Site Traffic Control Plan, prior to the start of any construction work. Therefore, Project impacts with respect to emergency access would be less than significant and no mitigation is required.</p>
4.12-1(c) Hillside Fire/Vegetation Management Plan	
<p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, projects shall have a 200-foot minimum Fuel Management Zone in place, and it shall be cleared annually, around each structure on the project site. A Fire/Vegetation Management Plan for the Fuel Management Zone shall be prepared that requires the following: all-natural vegetation will be thinned out by 70 percent and all dead vegetation, including grass will be maintained at less than four inches in height; if the zone is not irrigated, the area may be covered with chipped biomass four inches deep; no tree limb shall be within 10 feet of a chimney, including outdoor barbeques; trees must be maintained free of dead branches;</p>	<p>No Mitigation Required. The Project Site is not located in a VHFHSZ or SRA, but the Project does propose more than 300 housing units (the Project includes the construction of 348 dwelling units). However, there are no unusual site-specific, area, roadway, or Project characteristics that would result in an increased fire risk. The Project Site is located in an urbanized area of the City and is developed with commercial uses and surface parking, and does not contain vegetation that needs to be cleared for fuel management. Therefore, this mitigation measure would not be applicable to the Project.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>trees must be limbed up four feet or 1/3 the height of the tree; trees over driveways or roads must be limbed up to 15 feet; the shrub height limit is two feet.</p> <p>Furthermore, the following requirements shall be included in the Fire/Vegetation Management Plan. The following shrubs and trees are highly flammable and shall not be planted on or around the project site:</p> <ul style="list-style-type: none"> • Sage species (<i>Salvia</i> spp.) • Pampas grass (<i>Cortaderia</i> spp.) • Cypress (<i>Cupressus</i> spp.) • Eucalyptus (<i>Eucalyptus</i> spp.) • Juniper (<i>Juniperus</i> spp.) • Pine (<i>Pinus</i> spp.) • Cedar (<i>Cedrus</i> spp.) <p>The following shrubs and trees shall be used for general landscaping to reduce fire hazard associated with flammable vegetation:</p> <ul style="list-style-type: none"> • Coastal live oak (<i>Quercus</i> spp.) • California sycamore (<i>Platanus racemosa</i>) • Cottonwood (<i>Populus fremontii</i>) • Willow (<i>Salix</i> spp.) • Mulefat (<i>Baccharis salicifolia</i>) • California bay (<i>Umbellularia californica</i>) • California black walnut (<i>Juglans californica</i>) • Liquidambar (<i>Liquidambar styraciflua</i>) • California lilac (<i>Ceanothus</i> spp.) • Toyon (<i>Heteromeles arbutifolia</i>) • Mountain mahogany (<i>Cercocarpus betuloides</i>) • Holly leaf cherry (<i>Prunus ilicifolia</i>) • Dwarf periwinkle (<i>Vinca minor</i>) • Grass (<i>Stipa</i> spp.) <p>The Fire/Vegetation Management Plan shall be reviewed and approved by the City of Los Angeles Fire Department prior to project approval.</p>	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>4.12-1(d) Submittal of Plot Plan</p> <p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, submittal of a plot plan for approval by the LAFD shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. In addition, the following recommendations by the LAFD relative to fire safety may be incorporated into the building plans:</p> <ul style="list-style-type: none"> • Access for Fire Department apparatus and personnel to and into all structures shall be required. • The entrance to a residence lobby must be within 50 feet of the desired street address curb face. • Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units. • The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. • The Fire Department may require additional vehicular access where buildings exceed 28 feet in height. • Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof. • Entrance to the main lobby shall be located off the address side of the building. • Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department. 	<p>No Mitigation Required. As discussed in Section 6.XV(a) of the Initial Study, existing facilities are capable of providing acceptable fire protection and emergency response services, and therefore, the Project would not require the need for new or physically altered governmental facilities. Additionally, the Project would be subject to the existing regulations in the LAMC and City’s Fire Code. Thus, the Project would not require the need for new or physically altered governmental facilities, the construction of which could result in significant environmental impacts, and no mitigation measures would be required.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department. • Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. • The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky. • Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. • Submit plot plans indicating access road and turning area for Fire Department approval. • Adequate public and private fire hydrants shall be required. • Standard cut-corners will be used on all turns. • Any roof elevation changes in excess of three feet may require the installation of ships ladders. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access. • All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued. • Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off. • Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy. • All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems. 	

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10. • Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2. 	
4.12-2(a) Crime Prevention Unit Consultation	
<p>For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.</p>	<p>Mitigation Incorporated. As discussed in Section 6.XV(b) of the Initial Study, existing facilities are capable of providing acceptable police protection services, and therefore, the Project would not require the need for new or physically altered governmental facilities. Thus, the Project would not require the need for new or physically altered governmental facilities, the construction of which could result in significant environmental impacts, and no mitigation measures would be required. Nevertheless, the Project would implement MM 4.12-2(a).</p>
4.12-2(b) Security During Construction	
<p>During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site.</p> <p>Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided.</p>	<p>Mitigation Incorporated. As discussed in Section 6.XV(b) of the Initial Study, existing facilities are capable of providing acceptable police protection services, and therefore, the Project would not require the need for new or physically altered governmental facilities. Thus, the Project would not require the need for new or physically altered governmental facilities, the construction of which could result in significant environmental impacts, and no mitigation measures would be required. Nevertheless, the Project would implement MM 4.12-2(b).</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.	
Transportation	
4.14-1 Construction Management Plan	
<p>Any discretionary project that LADOT determines will have potential impacts to the circulation system even with application of existing regulatory compliance measures, shall prepare a detailed Construction Management Plan (CMP), including street closure information, detour plans, haul routes, and staging plans shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include those elements required by LADOT for the project, which may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Providing for temporary traffic control during all construction activities adjacent to public right of way to improve traffic flow on public roadways (e.g., flag men). • Prohibition of construction worker parking on any adjacent residential streets. • Prohibitions on construction-related vehicles parking on surrounding public streets. • Prohibitions on construction equipment or material deliveries within the public right-of-way. • Accommodation of all equipment on site as feasible. • Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men). • Scheduling of construction activities, including deliveries, to reduce the effect on peak hour traffic flow on surrounding arterial streets. • Rerouting of construction trucks to reduce travel on congested streets to the extent feasible. • Provisions of safety precautions for pedestrians and bicyclists through alternate routing and protection barriers and signage. • Provisions to accommodate the staging and storage of equipment. 	<p>No Mitigation Required. As discussed in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would be required to implement a Construction Work Site Traffic Control Plan, prior to the start of any construction work. This plan would include the same components, as applicable, as MM 4.14-1. Therefore, the Project would not be required to implement MM T4.14-1.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • Scheduling of construction-related deliveries to reduce travel during commuter peak hours. • Obtain necessary permits for any truck hauling from the City prior to issuance of any permit for the project. • Noticing and coordination with any nearby schools that may be affected by construction activities, including deliveries, hauling and other construction transportation, to ensure safety of school children. • Ensuring all feasible safety measures are taken to accommodate safe travel of pedestrian, bicyclists, and other users of the sidewalks around the construction site, including but not limited through the following measures: <ul style="list-style-type: none"> • Construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. • Maintaining adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. • Providing temporary pedestrian facilities adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. • Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. • Keeping sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. • Reopening the sidewalk as soon as reasonably feasible taking construction and construction staging into account. 	
<p>4.14-2 Transportation Demand Management Program</p>	
<p>If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant shall prepare a TDM program to reduce VMT impacts below the City's project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. TDM measures shall include but not be limited to the following examples:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as stated in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would not result in any significant VMT impacts. Nevertheless, the Project will comply with the City's TDM Ordinance.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>TDM strategies applicable for the residential component: Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.</p> <p>TDM strategies applicable if the project includes an office component: Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.</p> <p>TDM strategies applicable for both the office and residential components:</p> <p>Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.</p>	
Tribal Cultural Resources	
4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects	
<p>All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.</p>	<p>Mitigation Incorporated. As described in Section 6.V(b) of the Initial Study, an Archaeological Resources Assessment was prepared for the Project (included in Appendix C of this Initial Study), which included SCCIC and SLF searches. The Archaeological Resources Assessment concluded that the potential for unidentified archaeological resources at the Project Site is found to be low.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.</p>	<p>As discussed in Section 6.XVIII(b) of the Initial Study, notification letters pursuant to AB 52 were mailed on May 3, 2022, to all contacts on the City’s AB 52 Native American Heritage Commission Tribal Consultation List. A consultation call between the City and representatives of the Gabrieleno Band of Mission Indians – Kizh Nation took place on September 29, 2022, and consultation was formally closed by the City on August 28, 2023 (see closure letter included in Appendix K of this Initial Study). Should tribal cultural resources be inadvertently encountered during Project construction, the Project would comply with MM 4.15-1(a), which would ensure that impacts with respect to tribal cultural resources are less than significant.</p>
<p>4.15-1(b) Discovery of Potential Tribal Cultural Resources</p>	
<p>In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published,</p>	<p>Mitigation Incorporated. As discussed in Section 6.XVIII(b), a consultation call between the City and representatives of the Gabrieleno Band of Mission Indians – Kizh Nation took place on September 29, 2022, and consultation was formally closed by the City on August 28, 2023 (see closure letter included in Appendix K of this Initial Study). Should tribal cultural resources be inadvertently encountered during Project construction, the Project would comply with MM 4.15-1(b), which would ensure that Project impacts with respect to tribal cultural resources would be less than significant.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<p>except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.</p> <p>The measure shall be shown on plans.</p>	
Wildfire	
4.17-1 Hillside Construction Staging and Parking Plan	
<p>For discretionary projects for development located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan, prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • No construction equipment or material shall be permitted to be stored within the public right-of-way. 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XX of the Initial Study, it is not applicable to the Project, as the Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone. Thus, no impacts related to this issue would occur.</p>

**Table 5-1
Housing and Safety Element Mitigation Measures**

Mitigation Measures	Applicability to the Project
<ul style="list-style-type: none"> • If the property fronts on a designated Red Flag Street, on noticed “Red Flag” days, all workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days. • During the Excavation and Grading phases, only one truck hauler shall be allowed on the site at any one time. The drivers shall be required to follow the designated travel plan or approved Haul Route. • Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays. • All deliveries during construction shall be coordinated so that only one vendor/delivery vehicle is at the site at one time, and that a construction supervisor is present at such time. • A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors. • During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department. 	
<p>4.17-3 Undergrounding of Power Lines in and Near an SRA and VHFHSZs</p>	
<p>For all discretionary applications for development located in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XX of the Initial Study, it is not applicable to the Project, as the Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone. Thus, no impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
<p>Aesthetics <i>Scenic Vista</i></p>	<p>MM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity. 	<p>No Mitigation Required. This mitigation measure is not incorporated because PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” According to the City’s Zoning Information and Map Access System (ZIMAS), the Project Site is located within a Transit Priority Area. Thus, the Project Site is located in a transit priority area as defined in PRC Section 21099, and the Project’s aesthetic impacts shall not be considered significant impacts on the environment, and no mitigation is required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	h) Use see-through safety barrier designs (e.g. railings rather than walls).	
<p><u>Aesthetics</u> <i>Visual Character/Quality</i></p>	<p>MM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, 	<p>No Mitigation Required. This mitigation measure is not incorporated because PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The Project qualifies for this provision, and no mitigation is required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.</p> <p>f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:</p> <ul style="list-style-type: none"> - use transparent panels to preserve views where sound walls would block views from residences; - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - construct sound walls of materials whose color and texture complements the surrounding landscape and development; <p>g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.</p>	
<p><u>Aesthetics</u> <i>Light/Glare/Shade</i></p>	<p>MM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The Project qualifies for this provision, and no mitigation is required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 	
<p><u>Agriculture and Forestry</u> <i>Conversion of Farmland to Non-Ag Use, Conversion of Forest Land</i></p>	<p>MM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, 	<p>No Mitigation Required. As discussed in more detail in Section 6.II, Agriculture and Forestry Resources, below, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the Project Site. Further, no farmland or agricultural activity exists on or in the vicinity of the Project Site and the Project Site is currently developed with retail uses. Finally, the Project Site is zoned [Q]C4-2-CDO and [Q]C2-1-CDO for commercial uses, and is not zoned for agricultural uses. Therefore, no impacts would occur and the Project would not be required to implement MM AG-1, MM AG-4, and MM AG-5.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>fees, or elimination of development rights/potential.</p> <p>b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</p> <p>c) Maintain and expand agricultural land protections such as urban growth boundaries.</p> <p>d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</p> <p>e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.</p> <p>f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</p> <p>MM AG-2 and AG-3 are provided below.</p> <p>MM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.</p> <p>c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.</p> <p>MM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation</p>	
<p><u>Agriculture and Forestry Zoning for Ag Use, Williamson Act Contract</u></p>	<p>MM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ul style="list-style-type: none"> a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. 	<p>No Mitigation Required. This mitigation measure is not incorporated because the Project Site is currently developed with retail uses, is zoned [Q]C4-2-CDO and [Q]C2-1-CDO for commercial uses, and is not zoned for agricultural production. As described in greater detail in Section 6.II, Agriculture and Forestry Resources, below, there is no farmland at the Project Site, and there are no Williamson Act Contracts in effect for the Project Site, and no impacts related to this issue would occur.</p>
<p><u>Agriculture and Forestry Conflict with existing zoning or rezoning of forest land or timberland, Conversion/loss of forest land</u></p>	<p>MM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because the Project Site is currently developed with retail uses, is zoned [Q]C4-2-CDO and [Q]C2-1-CDO for commercial uses, and is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.</p>	
<p><u>Air Quality</u> <i>Potential to Violate AQ Standard, Result in cumulatively considerable increase of criteria pollutant</i></p>	<p>MM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Minimize land disturbance.</p> <p>b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</p> <p>c) Cover trucks when hauling dirt.</p> <p>d) Stabilize the surface of dirt piles if not removed immediately.</p> <p>e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.</p> <p>f) Minimize unnecessary vehicular and machinery activities.</p> <p>g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</p> <p>i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering,</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because the existing regulatory measures listed below would apply to the Project and are equal to or more effective than MM AQ-1.</p> <p>Specifically, the applicable regulatory requirements identified by CARB and the South Coast Air Quality Management District, and other agencies to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible, are set forth below:</p> <ul style="list-style-type: none"> • The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: <ul style="list-style-type: none"> ○ All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. ○ The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

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	<p>and 18-Dust Palliative shall be incorporated into project specifications.</p> <p>j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.</p> <p>k) Ensure that all construction equipment is properly tuned and maintained.</p> <p>l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.</p> <p>m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.</p> <p>o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes.</p>	<ul style="list-style-type: none"> ○ All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. ○ All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. ○ All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. ○ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. ○ Trucks having no current hauling activity shall not idle but be turned off. ● The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). ● The Project shall comply with the CARB 2010 model year engine (MYE) phasing program (Truck and Bus Regulation). ● In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. ● In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-

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	<p>Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.</p> <p>p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</p> <p>q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer’s recommended maintenance schedule and specifications. All maintenance records for each equipment and their</p>	<p>ignition engines shall meet specified fuel and fuel additive requirements and emission standards.</p> <ul style="list-style-type: none"> • The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. • The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. <p>Regarding the portion of Mitigation Measure AQ-1 that requires Tier 4 Final equipment, the analysis contained in Section 6.III, Air Quality, below, and also in the air quality modeling contained in Appendix A-1 of this Initial Study, assumes a mix of both Tier 3 and Tier 4 equipment. As the analysis demonstrates that the Project would not result in any significant impacts requiring mitigation, the Project would not be required to use only Tier 4 equipment during construction. Nevertheless, as discussed above, the Project would implement MM 4.2-3 from the City’s Housing and Safety Element EIR, which requires the use of Tier 4 construction equipment, where available, or the preparation of a construction health risk assessment.</p>

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	<p>contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.</p> <p>r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p> <p>s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p>	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: <ul style="list-style-type: none"> a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction 	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.</p> <ul style="list-style-type: none"> f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. <p>x) As applicable for rail projects, the following measures should be considered:</p> <ul style="list-style-type: none"> a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. <p>y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.</p> <p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p> <ul style="list-style-type: none"> a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that 	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>enhanced filtration units are installed on-site before a permit of occupancy is issued.</p> <ul style="list-style-type: none"> c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner’s Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. <p>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	
<p><u>Air Quality</u> <i>Expose Sensitive Receptors to Pollutants</i></p>	<p>Refer to MM AQ-1, above.</p>	<p>No Mitigation Required. MM AQ-1, provided in the row above, is not incorporated because the Project impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant (see analysis contained in Section</p>

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		6.III(c), below). Therefore, no mitigation measures are required.
<p><u>Biological Resources</u> <i>Adverse Effect on Candidate, Sensitive, or Special Status Species, Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>The following mitigation measure addresses special status species only:</p> <p>MM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: <ul style="list-style-type: none"> i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts 	<p>No Mitigation Required. As described in greater detail in Section 6.IV(a), below, the Project would not require the incorporation of this mitigation measure for the following reasons:</p> <ul style="list-style-type: none"> • Project impacts related to adverse effects, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, would be less than significant, and no mitigation is required. • The Project Site does not contain any critical habitat or support any species identified or designated 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. • The Project Site is located in an urbanized area of the City, and is developed with commercial uses and surface parking. Thus, none of the mitigation measures that pertain to compliance with Sections 7, 9, and 10(a) of the Federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, are applicable to the Project. <p>Additionally, the Project would incorporate the second and third paragraphs of MM 4.3-1(b) from the City's</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid 	<p>Housing and Safety Element EIR as it relates to nesting birds, and with implementation of MM 4.3-1(b), Project impacts to nesting and migratory birds would be less than significant.</p>

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	<p>the rainy season when erosion and sediment transport is increased.</p> <p>j) Develop an invasive species control plan associated with project construction.</p> <p>k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.</p> <p>l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</p> <p>m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</p>	
<p><u>Biological Resources</u> <i>Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>MM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section 6.IV(b), below, the Project Site does not contain any wetlands, riparian habitats, sensitive natural community or critical habitat or support any species identified or designated 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, and no impacts related to this issue would occur. The Project Site is located in an urbanized area of the City on a site that is zoned [Q]C4-2-CD) and [Q]C2-1-CDO and is currently</p>

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	<p>endangered species afforded protection pursuant to the federal ESA.</p> <p>b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <p>c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <p>d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.</p> <p>e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.</p> <p>f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using</p>	<p>developed with retail uses. Therefore, no mitigation measures are required.</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>the areas in conjunction with breeding activities.</p> <p>g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</p> <p>h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.</p> <p>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</p> <p>j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.</p> <p>k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.</p> <p>l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.</p> <p>m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.</p>	

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	<ul style="list-style-type: none"> n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport. 	
<p><u>Biological Resources</u> <i>Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>MM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <ul style="list-style-type: none"> a. Require project design to avoid federally protected aquatic resources consistent with 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section 6.IV(c), below, the Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Moreover, the Project Site is an infill site in an urban setting in a region that is fully developed and would not affect species movement or policies or regulations protecting biological resources. No impacts related to</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.</p> <p>b. Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.</p> <p>c. Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource</p>	<p>this issue would occur, and no mitigation measures are required.</p>

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	<p>functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> -- Permittee-responsible mitigation -- Contribution of in-kind in-lieu fees -- Use of in-kind mitigation bank credits -- Where avoidance is determined to be infeasible and <p>d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> -- Avoidance -- Impact Minimization -- On-site alternatives -- Off-site alternatives <p>e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p>	
<p><u>Biological Resources</u> <i>Interfere with the Movement of Species, Conflict with Local</i></p>	<p>MM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and</p>	<p>No Mitigation Required. The Project would comply with applicable regulatory requirements, which include the MBTA (Title 33, United States Code,</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
<p><i>Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> a. Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b. Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c. Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d. Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e. Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f. Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests 	<p>Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Nevertheless, the Project would incorporate the second and third paragraphs of MM 4.3-1(b), with respect to nesting birds, from the City's Housing and Safety Element EIR, which is equal to or more effective than MM BIO-4. Implementation of this measure would ensure that impacts with respect to nesting and migratory birds are less than significant.</p> <p>The remaining provisions of MM BIO-4 are not incorporated because, as discussed in Section 6.IV, below, the Project Site is not located within a wildlife corridor, nor would the Project interfere with any wildlife movement or result in habitat fragmentation.</p> <p>Additionally, as discussed in greater detail in Section 6.IV(d), below, while the Project involves the removal of 11 trees, none of the existing trees are designated by the City as protected trees. Therefore, no mitigation measures with respect to protected trees are required.</p>

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	<p>should only be removed prior to February 1, or following the nesting season.</p> <ul style="list-style-type: none"> g. When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h. Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i. Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j. Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k. Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l. When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m. Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. 	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>n. Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>o. Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:</p> <ul style="list-style-type: none"> -- Wildlife movement buffer zones -- Corridor realignment -- Appropriately spaced breaks in center barriers -- Stream rerouting -- Culverts -- Creation of artificial movement corridors such as freeway under- or overpasses -- Other comparable measures <p>p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</p> <p>q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16- 059), as well as best management practices, to benefit pollinators with a focus on native plants.</p>	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
<p><u>Biological Resources</u> <i>Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>MM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such 	<p>No Mitigation Required. This mitigation measure is not incorporated, because compliance by the Project with existing City regulatory requirements are equal to or more effective than MM BIO-5. As described in greater detail in Section 6.IV(e), below, the Project would result in the removal of 11 trees on the Project Site (the Project does not include the removal of any street trees). As discussed in the tree report (included in Appendix B of this Initial Study), none of the trees that would be removed are designated by the City as protected trees. Nonetheless, and if applicable, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Site in conformance with the City’s Urban Forestry Division requirements for Project landscaping and street tree replacement and planting.</p> <p>Prior to the removal of trees located within the public right-of-way, the Project Applicant would be required to obtain approval from the Board of Public Works for the removal and replacement of said trees. Street trees would be required to be removed and replaced as required by the Urban Forestry Division and the Board of Public Works. The landscape plans for the Project shall identify all trees that would be removed. Compliance with the City’s requirements would ensure no significant impacts related to biological resources, in particular trees, would occur.</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>fences in place for duration of all such work. Clearly mark all trees to be removed.</p> <p>e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p> <p>f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p> <p>g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf</p>	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>transpiration, as directed by the certified arborist.</p> <p>h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources</p> <p>i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> -- Avoidance strategies -- Contribution of in-lieu fees -- Planting of replacement trees -- Re-landscaping areas with native vegetation post-construction -- Other comparable measures developed in consultation with local agency and certified arborist. 	
<u>Biological Resources</u>	MM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA	No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section

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Topic	2020-2045 RTP/SCS	Applicability to the Project
<p><i>Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable. 	<p>6.IV(f), below, the City has no adopted Habitat Conservation Plans or Natural Community Conservation Plans that would apply to the Project Site. As such, no impacts related to this issue would occur.</p>
<p><i>Cultural Resources Substantial Adverse Change in Significance of a Historical Resource, Substantial Adverse Change in the Significance of an Archaeological Resource</i></p>	<p>MM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the 	<p>Mitigation to be Addressed in EIR (for historical resources). The EIR will include an analysis of Project impacts with respect to historical resources. Therefore, the EIR will address the applicability of MM CULT-1 to the Project as it relates to historical resources.</p> <p>No Mitigation Required (for archaeological resources). Regarding archaeological resources, the Project requires the excavation of the underlying</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.</p> <p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> -- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, 	<p>alluvial sediments and the removal of the overlying artificial fill. As described in Section 6.V(b), below, an Archaeological Resources Assessment was prepared for the Project (included in Appendix C of this Initial Study), which concluded that the potential for unidentified archaeological resources at the Project Site is found to be low. Nevertheless, the Project would implement MM 4.4-2 from the City's Housing and Safety Element EIR, which is equal to or more effective than MM CULT-1 as it relates to archaeological resources, which would ensure that Project impacts with respect to archaeological resources would be less than significant. Therefore, the Project would not be required to implement MM CULT-1.</p>

**Table 5-2
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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.</p> <ul style="list-style-type: none"> -- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p> <p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS.</p>	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal</p>	

**Table 5-2
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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p> <p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as</p>	

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> <p>j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS</p> <p>k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a</p>	

**Table 5-2
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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.</p> <p>l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p>	
<p><u>Cultural Resources</u> <i>Disturb Human Remains</i></p>	<p>MM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as discussed in Section 6.V(c), below, existing regulatory requirements regarding discovery of human remains would apply to the Project and are equal to or more effective than the MM CULT-2.</p> <p>Specifically, in accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>informed and has determined that no investigation of the cause of death is required.</p> <p>b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:</p> <ul style="list-style-type: none"> -- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. -- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the 	<p>to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of 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 Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with this regulation, potential Project impacts to human remains would be less than significant.</p>

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	property and in a location that is not subject to further subsurface disturbance.	
<p><u>Geology and Soils</u> <i>Soil Erosion or Loss of Topsoil</i></p>	<p>MM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or 	<p>No Mitigation Required. This mitigation measure is not incorporated because the existing regulatory requirements listed below that require compliance with existing water quality standards as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) would apply to the Project and are equal to or more effective than the MM GEO-1.</p> <p>Specifically, the Project would be required to comply with the following regulatory requirements:</p> <ul style="list-style-type: none"> 1) The NPDES General Construction Permit including the preparation of a SWPPP and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City’s discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. 2) LID Ordinance: Also, during operation the Project would be required to comply with the City’s Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are

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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.</p> <p>c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</p> <p>d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.</p>	<p>required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not cause soil erosion or the loss of topsoil.</p>
<p><u>Geology and Soils</u> <i>Potential to Destroy Unique Paleo Resources or Unique Geological Features</i></p>	<p>MM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the</p>	<p>No Mitigation Required. As described in Section 6.VII(f), below, a Paleontological Resources Technical Report was prepared for the Project (included in Appendix D-3 of this Initial Study), which concluded that the Project Site is located in an area of high paleontological sensitivity. Therefore, the Project would implement MM 4.5-1(a) through 4.5-1(d) from the City’s Housing and Safety Element EIR, which are equal to or more effective than MM GEO-2, which would ensure that Project impacts with respect to paleontological resources would be less than significant. Therefore, the Project would not be required to implement MM GEO-2.</p>

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	<p>performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.</p> <p>b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 	

**Table 5-2
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Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ol style="list-style-type: none"> 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. <ol style="list-style-type: none"> e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. 	

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	<p>g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.</p> <p>h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.</p>	
<p><u>Greenhouse Gases</u> <i>Cumulative Impacts</i></p>	<p>MM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:</p> <p>i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</p> <p>ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters;</p>	<p>No Mitigation Required. As discussed in Section 6.VIII, below, the analysis of impacts with respect to GHG emissions focuses on consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions. The analysis contained in Section 6.VIII, below, demonstrates that Project impacts with respect to GHG emissions would be less than significant as the Project would be consistent with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the 2022 Climate Change Scoping Plan, the 2020–2045 RTP/SCS, and the Green New Deal. Therefore, no mitigation measures are required.</p> <p>In addition, the Project’s compliance with existing regulatory requirements, including but not limited to</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>appliances; equipment; and control systems.</p> <ul style="list-style-type: none"> iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. <ul style="list-style-type: none"> b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: 	<p>the City's Green Building Code, would further reduce the Project's GHG emissions.</p> <p>Finally, pursuant to Public Resources Code Sections 21155.2 and 21159.28, a Sustainable Communities EIR prepared for a TPP that is consistent with the 2020-2045 RTP/SCS and its applicable mitigation measures does not need to prepare or discuss project specific or cumulative GHG emission impacts associated with car or light-duty truck trips.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. <p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; <p>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;</p> <p>g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>providing dedicated shuttle service to transit stations; and</p> <p>h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. <p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p> <p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> i. Developing on infill and brownfields sites; 	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. vi. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible. 	
<p><u>Hazards and Hazardous Materials</u> <i>Significant Hazard due to Routine Transport, Use, or Disposal of Hazardous Materials, Reasonably Foreseeable Upset and Accident Conditions, Hazardous</i></p>	<p>MM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.IX(a), below, Project impacts with respect to the transport, use, or disposal of hazardous materials would be less than significant and no mitigation measures are required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
<p><i>Emissions or Materials Near School</i></p>	<p>a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</p> <p>b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.</p> <p>c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:</p> <ul style="list-style-type: none"> -- The types of hazardous materials or chemicals stored and/or used on-site, 	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</p> <ul style="list-style-type: none"> -- The location of such hazardous materials. -- An emergency response plan including employee training information. -- A plan that describes the way these materials are handled, transported and disposed. <p>d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</p> <p>e) Avoid overtopping construction equipment fuel gas tanks.</p> <p>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</p> <p>g) Properly dispose of discarded containers of fuels and other chemicals.</p> <p>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</p> <p>i) Identify and implement more stringent tank car safety standards.</p> <p>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</p> <p>k) Use the best available inspection equipment and protocols and implement positive train control.</p> <p>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</p> <p>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</p> <p>n) Notify in advance county and city emergency operations offices of all crude oil shipments,</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>including a contact number that can provide real-time information in the event of an oil train derailment or accident.</p> <ul style="list-style-type: none"> o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies. 	
<p><u>Hazards and Hazardous Materials</u> <i>Accidental release of hazardous materials</i></p>	<p>MM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; 	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.IX(b), below, Project impacts with respect to an accidental release of hazardous materials would be less than significant and no mitigation measures are required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials. 	
<p><u>Hazards and Hazardous Materials</u> <i>Emit hazardous emissions/materials near a school</i></p>	<p>MM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where the construction and operation of projects involves the transport of hazardous 	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.IX(c), below, Project impacts with respect to the use of hazardous materials near a school would be less than significant and no mitigation measures are required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.</p> <p>b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.</p>	
<p><u>Hazards and Hazardous Materials Located on a Hazardous Materials Site Section 65962.5</u></p>	<p>MM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.</p> <p>b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.IX(d) and in the Phase I Environmental Site Assessment (included in Appendix E-1 of this Initial Study), the Project Site is not included on any list compiled pursuant to Government Code Section 65962.5, and no impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. 	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p> <p>i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.</p> <p>j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>groundwater and vapor intrusion into the building.</p> <p>k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.</p> <p>l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.</p> <p>m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations.</p> <p>n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM,</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</p> <p>o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.</p>	
<p><u>Hazards and Hazardous Materials Interfere with an emergency/evacuation plan</u></p>	<p>MM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. As discussed in Section 6.IX(f), below, the Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements, which would ensure that the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City-designated disaster routes, such that the Project would impair implementation of the City's emergency response plan.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation. 	
<p><i>Hydrology and Water Quality Violate Water Quality Standards or Waste Discharge Requirements, Alteration of Site Drainage Pattern, Runoff Exceeding Stormwater Drainage System Capacity, Otherwise Degrade Water Quality</i></p>	<p>MM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. 	<p>No Mitigation Required. This mitigation measure is not incorporated because the existing regulatory requirements listed below as governed by the LARWQCB and the City regarding water quality would apply to the Project and are equal to or more effective than the MM HYD-1.</p> <p>Specifically, the Project would be required to comply with the following regulatory requirements:</p> <ul style="list-style-type: none"> 1) The NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City’s discharge requirements would ensure that

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, 	<ul style="list-style-type: none"> 2) construction stormwater runoff would not violate water quality and/or discharge requirements. During operation, the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.</p> <p>l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.</p> <p>m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</p>	
<p><u>Hydrology and Water Quality</u> <i>Deplete Groundwater Supply or Interfere with Groundwater Recharge</i></p>	<p>MM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.X(b), below, the Project Site area is not a source of groundwater recharge, and following the redevelopment of the Project Site, groundwater recharge would remain negligible. Based on the depth to groundwater, temporary dewatering may be required during construction. However, the amount of groundwater infiltration to occur would be minimal given the small area and depth to excavation. Therefore, impacts related to this issue would be less than significant and no mitigation measures are required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</p> <p>b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</p> <p>c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.</p> <p>d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p>	
<p><u>Hydrology and Water Quality</u> <i>Structures within a 100-Year Floodplain Hazard Area, Risk due to Levee or Dam Failure, Risks due to Seiche, Tsunami, or Mudflow</i></p>	<p>MM HYD-4¹³ In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.X(d), below, the Project Site is not, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map (map number 06037C1605F), located within a designated flood zone. Also, the Project Site is not located within an area potentially affected by seiche, tsunami, or mudflow.</p> <p>According to ZIMAS, the Project Site is also not located within a designated 100-year flood plain. As discussed in Section 6.X(d), below, the Project Site is not identified in the Safety Element of the General</p>

¹³ Note that there is no MM HYD-3 in the 2020-2045 RTP/SCS EIR.

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p>	<p>Plan as being located in any area potentially susceptible to floods associated with a levee or dam.</p>
<p><u>Land Use and Planning</u> <i>Physically Divide a Community</i></p>	<p>MM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: <ul style="list-style-type: none"> -- Selecting alignments within or adjacent to existing public rights of way. -- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. -- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other 	<p>No Mitigation Required. This mitigation measure is not incorporated because the Project does not include the development of new roadway facilities and would not physically divide a community. No impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>measures to reduce impacts, including but not limited to:</p> <ul style="list-style-type: none"> -- Alignment shifts to minimize the area affected. -- Reduction of the proposed right-of-way take to minimize the overall area of impact. -- Provisions for bicycle, pedestrian, and vehicle access across improved roadways. 	
<p><u>Land Use and Planning</u> <i>Conflict with Applicable Land Use Plan, Policy, or Regulation</i></p>	<p>MM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation. 	<p>No Mitigation Required. Mitigation Measure LU-2 is not incorporated because, as described in Section 6.XI(b), below, and in the consistency tables contained in Appendix F of this Initial Study, the Project is consistent with the existing General Plan land use designation and zoning for the Project Site, and it was determined that the Project would not conflict with any applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect Impacts would be less than significant, and no mitigation measures are required.</p>
<p><u>Mineral Resources</u> <i>Loss of Availability of a Known Mineral Resource</i></p>	<p>MM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.XII, below, the Project Site is not located within the Los Angeles Downtown Oil Field, a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. None of the suggested measures are applicable as there are no known aggregate and mineral sources or locally important mineral resource</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: <ul style="list-style-type: none"> 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) 	<p>recovery sites on or adjacent to the Project Site. No impacts related to these issues would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.</p>	
<p><u>Noise</u> <i>Exposure of Persons to Noise in Excess of Local Standards, Excessive Groundborne Vibration or Noise Levels, Substantial Permanent Increase in Noise Level, Substantial Temporary Increase in Noise Levels</i></p>	<p>MM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 	<p><u>Mitigation to be Addressed in EIR.</u> The EIR will include an analysis of Project impacts with respect to noise. Therefore, the EIR will address the applicability of MM NOISE-1 to the Project.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.</p> <p>f) Designate an on-site construction complaint and enforcement manager for the project.</p> <p>g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</p> <p>h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <p>i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>barrier between the roadway and sensitive receptors.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned</p> <p>l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</p> <p>m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;</p> <p>n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p> <p>o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>shrouds, wherever feasible) for project construction.</p> <p>p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p> <p>q) Use of portable barriers in the vicinity of sensitive receptors during construction.</p> <p>r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.</p> <p>s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.</p> <p>t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.</p> <p>u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.</p> <p>v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p> <p>w) Use techniques such as grade separation, buffer zones, landscaped berms, dense</p>	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</p> <p>x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p> <p>Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	
<p><u>Noise</u> <i>Exposure of Persons to Excessive Groundborne Vibration or Noise Levels</i></p>	<p>MM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.</p> <p>b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.</p> <p>c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum</p>	<p>Mitigation to be Addressed in EIR. The EIR will include an analysis of Project impacts with respect to noise and vibration. Therefore, the EIR will address the applicability of MM NOISE-2 to the Project.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.</p> <p>d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.</p> <p>e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).</p> <p>f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.</p>	
<p><u>Population and Housing Displacement of Housing, Requiring Replacement Housing Elsewhere</u></p>	<p>MM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.</p> <p>b) Prioritize the use existing ROWs, wherever feasible.</p> <p>c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because the Project would consist of the development of new housing and commercial land uses on a site that is currently developed with nonresidential uses. No displacement of existing housing would occur with the development of the Project and therefore, none of the suggested measures are applicable.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>between right-of-way acquisition and construction.</p> <p>d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).</p> <p>e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.</p>	
<p><u>Public Services</u> <i>Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Fire and Emergency Services</i></p>	<p>MM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include 	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.XV(a), below, existing facilities are capable of providing acceptable fire protection and emergency response services, and therefore, the Project would not require the need for new or physically altered governmental facilities. Additionally, the Project would be subject to the existing regulations in the City's Fire Code and LAMC related to emergency access. Thus, the Project would not require the need for new or physically altered governmental facilities, the construction of which could result in significant environmental impacts. While no mitigation is required, the Project would nevertheless incorporate the following mitigation measures from the City's Housing and Safety Element EIR with respect to public services (police protection): MM 4.12-2(a) and MM 4.12-2(b).</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.</p>	
<p><u>Public Services</u> <i>Adverse Impacts Associated with New or Physically Altered Governmental Facilities for School Services</i></p>	<p>MM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. 	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.XV(c), below, existing regulatory requirements requiring the payment of school fees would apply to the Project and are equal to or more effective than the MM PSS-1. Specifically, the Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the Project area.</p>
<p><u>Public Services</u> <i>Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Library Services</i></p>	<p>MM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XV(e), below, the Project would not result in the need for a new or physically altered library facility, the construction of which could cause environmental impacts, and therefore, no mitigation measures are required.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	appropriate and applicable, to mitigate identified CEQA impacts.	
<p><i>Recreation Increased Use or Physical Deterioration of Recreational Facilities</i></p>	<p>MM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: <ul style="list-style-type: none"> i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XV(d), below, the existing regulatory requirement to pay applicable park fees in accordance with LAMC Section 17.12 is equal to or more effective than the MM REC-1.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	v. Including trail systems and trail segments in General Plan recreation standards.	
<p><u>Transportation/Traffic Conflict/inconsistent with CEQA Guidelines Section 15064.3(b) (VMT)</u></p>	<p>MM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways: <ul style="list-style-type: none"> -- include TDM mitigation requirements for new developments; -- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; -- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as stated in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would not result in any significant VMT impacts. Further, the Project will comply with the City’s TDM Ordinance.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> -- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; -- develop TDM-specific performance measures to evaluate project-specific and system-wide performance; -- incorporate TDM performance measures in the decision-making process for identifying transportation investments; -- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and -- set aside funding for TDM initiatives. -- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis. 	
<p><u>Transportation/Traffic Inadequate Emergency Access Hazards and Hazardous Materials Impair or Interfere with Emergency Response or Evacuation Plan</u></p>	<p>MM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. As discussed in the Transportation Assessment Letter prepared by LADOT (included in Appendix G of this Initial Study), the Project would be required to implement a Construction Work Site Traffic Control Plan, prior to the start of any construction work. This plan would include the same components, as applicable, as MM TRA-2. Therefore, the Project would not be required to implement MM TRA-2. The construction of the Project would not impair implementation of an</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:</p> <ul style="list-style-type: none"> -- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. -- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. -- Scheduling of truck trips outside of peak morning and evening commute hours. -- Limiting of lane closures during peak hours to the extent possible. -- Usage of haul routes minimizing truck traffic on local roadways to the extent possible. -- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. -- Installation of traffic control devices as specified in the California Department of 	<p>adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.</p> <ul style="list-style-type: none"> -- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. -- Storage of construction materials only in designated areas. -- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. -- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. -- Enhance emergency preparedness awareness among public agencies and with the public at large. 	
<u>Tribal Cultural Resources</u>	MM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and	No Mitigation Required. As discussed in Section 6.XVIII(b), a consultation call between the City and representatives of the Gabrieleno Band of Mission

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource. 	<p>Indians – Kizh Nation took place on September 29, 2022, and consultation was formally closed by the City on August 28, 2023 (see closure letter included in Appendix K of this Initial Study). Should tribal cultural resources be inadvertently encountered during Project construction, the Project would comply with MM 4.15-1(a) and 4.15-1(b) from the City’s Housing and Safety Element EIR, which are equal to or more effective than MM TCR-1, which would ensure that impacts with respect to tribal cultural resources are less than significant. Therefore, the Project would not be required to implement MM TCR-1.</p>
<p><u>Utilities and Service Systems</u> <i>Require New Water or Wastewater Treatment Facilities</i></p>	<p>MM USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XIX(a), below, it is not applicable to the Project, as the Project would not require the need for new or upgraded water or wastewater treatment facilities.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<p>a) During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.</p>	
<p><u>Utilities and Service Systems</u> <i>Require New or Expanded Entitlements for Water Supply</i></p>	<p>MM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</p>	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.XIX(b), below, it is not applicable to the Project, as the Project would not require the need for new or expanded water supply facilities.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite. 	
<p><u>Utilities and Service Systems</u> <i>Landfill with Sufficient Capacity</i></p>	<p>MM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. 	<p>No Mitigation Required. This mitigation measure is not incorporated because, as described in Section 6.XIX(d), below, existing regulatory requirements, such as the City’s recycling requirements, would apply to the Project and are equal to or more effective than the MM USSW-2.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. 	

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services. 	
<p><u>Wildfire</u> <i>Wildfire Risk</i></p>	<p>MM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XX, below, it is not applicable to the Project, as the Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone. Thus, no impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. 	
<p><u>Wildfire</u> <i>Exacerbate Fire Risks</i></p>	<p>MM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: 	<p>No Mitigation Required. This mitigation measure is not incorporated, because, as described in Section 6.XX, below, it is not applicable to the Project, as the Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone. Thus, no impacts related to this issue would occur.</p>

**Table 5-2
Applicability of RTP/SCS Mitigation Measures to the Project**

Topic	2020-2045 RTP/SCS	Applicability to the Project
	<ul style="list-style-type: none"> - Submit a fire protection plan including the designation of fire watch staff; - Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; - Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and - Designate trained fire watch staff during project construction to reduce risk of fire hazards. 	

6 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “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.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as 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. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹⁴

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis set forth in this Initial Study is presented for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

¹⁴ City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. In nonurbanized 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact to scenic vistas. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a State-designated scenic highway. Therefore, the Project would have a less than significant impact with respect to damaging scenic resources within a State-designated scenic highway. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact to scenic resources. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact to zoning and other regulations governing scenic quality. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact to light and glare. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

II. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Extent of Important Farmland Map Coverage maintained by the California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and

Monitoring Program indicates that the Project Site is not included in the Important Farmland category.¹⁵ Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Further, the Project Site is currently developed with two commercial buildings and associated surface parking and is not developed with any agricultural or farmland uses. Thus, no impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is zoned [Q]C4-2-CDO and [Q]C2-1-CDO (Commercial), with a General Plan land use designation of Regional Center Commercial. The Project Site is not zoned for agricultural use, nor is the Site under or eligible for enrollment under a Williamson Act Contract.¹⁶ There are no Williamson Act Contracts in the City of Los Angeles. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract, and no impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is developed with two commercial buildings and associated surface parking. The Project Site does not include any forest or timberland and is not zoned as forest land or timberland. As mentioned above, the Project Site is zoned [Q]C4-2-CDO and [Q]C2-1-CDO (Commercial), with a General Plan land use designation of Regional Center Commercial. Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is currently zoned for commercial uses and is developed with two commercial buildings and associated surface parking. The Project is not used as forest land, and therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁵ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998. <https://maps.conservation.ca.gov/DLRP/CIFF/>

¹⁶ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 19, 2021.

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

No Impact. The Project Site and surrounding area is developed with urban land uses. The Project Site is developed with two commercial buildings and associated surface parking. No agricultural uses or forest land are located on the Project Site or within the area.¹⁷ Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁷ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 19, 2021.

III. AIR QUALITY

Where available, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

Appendix A-1 Air Quality Technical Modeling, DKA Planning, August 2023.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as “criteria air pollutants,” are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Federal criteria air pollutants include carbon monoxide (CO), ground-level ozone (O₃), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter ten microns or less in diameter (PM₁₀), particulate matter 2.5 microns or less in diameter (PM_{2.5}), and lead (Pb). State-only criteria pollutants include Visibility Reducing Particles, Sulfates (SO₄²⁻), Hydrogen Sulfide (H₂S), and Vinyl Chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TACs can cause

acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). These include Diesel Particulate Matter (DPM) and Volatile Organic Compounds (VOCs).

The Clean Air Act (CAA) requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. CAA Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table 6.III-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and Pb.

**Table III-1
State and National Ambient Air Quality Standards and Attainment Status for LA County**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	N/A ¹	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Maintenance
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m ³	Attainment	No Federal Standards	

**Table III-1
State and National Ambient Air Quality Standards and Attainment Status for LA County**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Hydrogen Sulfide (H ₂ S)	1-hour	0.03 ppm (42 µg/m ³)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m ³)	N/A	No Federal Standards	

¹N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed July 2023, (www.arb.ca.gov/desig/adm/adm.htm).

Existing Conditions

Existing Health Risk in the Surrounding Area

Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 90036) is approximately 495 in a million (see Figure 6-1).¹⁸ The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., Santa Monica Freeway (I-10), approximately 1.9 miles to the south). In general, the risk at the Project Site is higher than 63 percent of the South Coast Air Basin’s population.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 30-35th percentile, which means the Project Site has a lower pollution burden than other communities within California.¹⁹

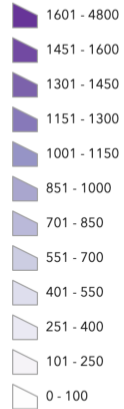
¹⁸ SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A34&views=view_38%2Cview_1 accessed October 20, 2021.

¹⁹ Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0 MAP, <https://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=4560cfbce7c745c299b2d0cbb07044f5>, accessed March 15, 2020.

Legend

Residential Air Toxics Cancer Risk Calculated from Model Data

Cancer Risk [per million]



South Coast AQMD Boundary

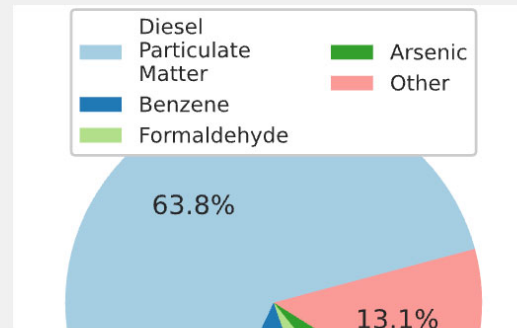


The air toxics cancer risk data presented in the MATES Data Visualization is calculated using a population-weighted average.

In zip code **90036**, the cancer risk is **495** per million

Air toxics cancer risk in this zip code is higher than **63.0%** of the South Coast AQMD population

Pollutants contributing to cancer risk



Zoom to



Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases.²⁰ According to the South Coast Air Quality Management District (SCAQMD), sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.²¹

As shown in Figure 6-2, sensitive receptors within 1,000 feet of the Project Site include, but are not limited to, the following representative sampling:

- Multi-family residences, 660 South Cochran Avenue, approximately five feet north of the Project Site.
- Multi-family residences, 661 South Cloverdale Avenue, approximately ten feet north of the Project Site.
- Cochran Apartments, 665 South Cochran Avenue, approximately 70 feet west of the Project Site.
- Multi-family residences, 664 South Cloverdale Avenue, approximately 60 feet east of the Project Site.
- Multi-family residences, 717 South Cochran Avenue, approximately 280 feet southwest of the Project Site.
- Cathedral Chapel School, 755 South Cochran Avenue, approximately 490 feet southwest of the Project Site.

²⁰ California Air Resources Board, Vulnerable Populations Research Program; August 2003.

²¹ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning; May 2005.

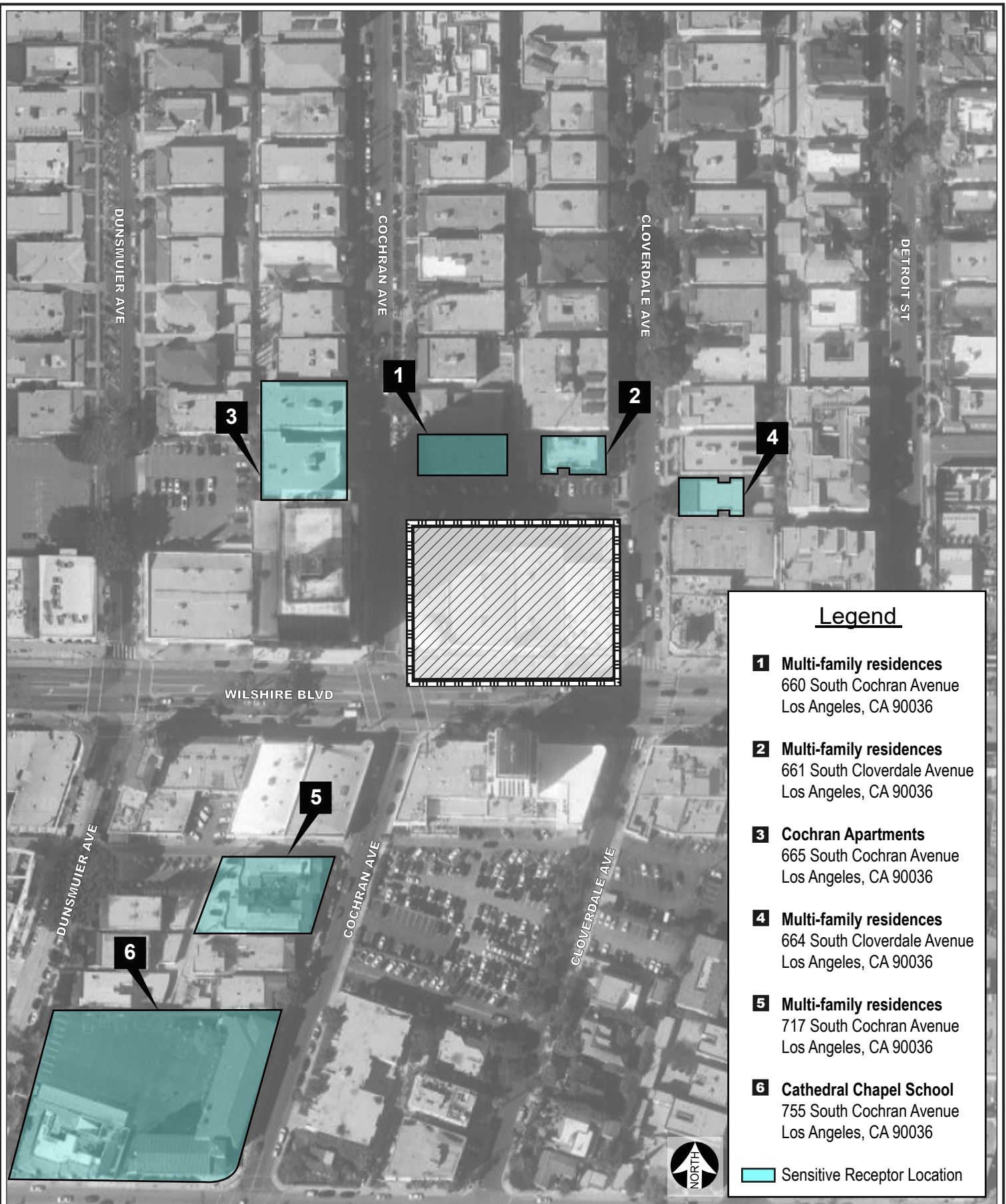


Figure 6-2
Sensitive Receptor Location Map

As summarized in Table 6.III-2, most existing emissions are associated with mobile sources from the 1,766 daily vehicle trips traveling to and from the Project Site and the 11,550 daily vehicle miles traveled (VMT).

**Table III-2
Existing Estimated Daily Operational Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1.2	<0.1	1.7	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	6.4	4.4	47.8	0.1	8.3	2.1
Net Regional Total	7.6	4.5	49.6	0.1	8.3	2.2

Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.14 model runs (included in Appendix A-1).

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod, version 2022.1.1.17) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analysis focuses on the potential change in air quality conditions due to Project implementation. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

Construction

Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Project-specific information was provided by the Applicant describing the schedule of construction activities and the required equipment inventory. Details pertaining to the schedule and equipment can be found in Appendix A of this Initial Study. The CalEEMod model provides default values for daily equipment usage rates and worker trip lengths, as well as emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition to vehicle trips to and from the Project Site.

The SCAQMD recommends that air pollutant emissions be assessed for both regional scale and localized impacts. The regional emissions analysis includes both on-site and off-site sources of emissions, while the localized emissions analysis focuses only on sources of emissions that would be located on the Project Site.

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.²² The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.²³ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. In accordance with SCAQMD guidance, maximum daily emissions of NO_x, CO, PM₁₀, and PM_{2.5} from on-site sources during each construction activity were compared to LST values for a one-acre site having sensitive receptors within 25 meters (82 feet).²⁴ This is appropriate given the size of the Project Site and the proximity of sensitive receptors to the Project Site.

The Basin is divided into 38 Source Receptor Areas (SRAs), each with its own set of maximum allowable LST values for on-site emissions sources during construction and operations based on locally monitored air quality. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values.

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD localized significance thresholds (LSTs) for NO₂, CO, and PM₁₀ were initially published in June 2003 and revised in July 2008.²⁵ The LSTs for PM_{2.5} were established in October 2006.²⁶ Updated LSTs were published on the SCAQMD website on October 21, 2009.²⁷ Table 6.III-4 below presents the significance criteria for both construction and operational emissions.

²² South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.

²³ South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, October 2009.

²⁴ South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

²⁵ South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

²⁶ South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

²⁷ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST

Operation

CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions of air pollutants are produced by mobile sources (vehicular travel) and stationary sources (utilities demand). Utilities for the Project Site are provided by the Los Angeles Department of Water and Power (LADWP) for electricity and Southern California Gas for natural gas. CalEEMod has derived default emissions factors for electricity and natural gas usage that are applied to the size and land use type of the Project. CalEEMod also generates estimated operational emissions associated water use, wastewater generation, and solid waste disposal.

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions. To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against the SCAQMD's significance thresholds.²⁸ Details describing the operational emissions of the Project can be found in the technical modeling contained in Appendix A of this Initial Study.

Toxic Air Contaminants

Potential TAC impacts during both construction and operation are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), if necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

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

Pursuant to the 2022 Air Quality Management Plan (AQMP), the SCAQMD has issued guidance on determining Project consistency with the AQMP. Consistency is based on the following:

- Would the project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or

Look-Up Tables, October 21, 2009.

²⁸ South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, [CEQA Air Quality Handbook](#), April 1993, pp. 6-1-6-2).

- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the Project include air quality mitigation measures; and
 - To what extent is Project development consistent with control measures?

Less Than Significant Impact. The air quality plan applicable to the Project area is the 2022 AQMP. The 2022 AQMP is the SCAQMD’s plan for improving regional air quality in the Basin. The 2022 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. The 2022 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour Ozone (O₃) control plan with new commitments for short-term NO_x and Volatile Organic Compound (VOC) reductions. The 2022 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

The 2022 AQMP adapts previously conducted regional air quality analyses to address the “extreme” ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NO_x emissions by 67 percent more than required by adopted rules and regulations in 2037. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP.

As discussed in greater detail below under subsection (b), the Project’s air quality emissions would not exceed any state or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG’s 2020–2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

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

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. As discussed in greater detail in Section XIV, Population and Housing, based on the City's VMT Calculator model (version 1.4), the Project would add a residential population of approximately 810 people to the Project Site. The Project's residential population would represent approximately 0.1 percent of the forecasted growth between 2016 and 2045 in the City²⁹ and would therefore be consistent with the projections in the AQMP.

Development of the Project would also result in approximately 37 employment positions on-site. As discussed in greater detail in Section XIV, Population and Housing, the Project's employment would represent approximately 0.01 percent of forecasted growth in the City for the period between 2016 and 2045.³⁰ Thus, the Project's estimated employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2022 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below under Thresholds (b), (c), and (d), the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the proposed Project meets this AQMP consistency criterion.

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

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

The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate

²⁹ The 2020-2045 RTP/SCS projected growth of 837,500 persons in the City of Los Angeles between 2016 and 2045, with the Project representing 0.1 percent of this growth. $810/837,400 \times 100 = 0.1\%$.

³⁰ When compared to the job growth projected in the 2022 RTP/SCS, this Project would represent 0.01 percent of the 287,600 additional jobs in the City from 2016 to 2045. $37/287,600 \times 100 = 0.01\%$.

more housing within a high quality transit area (HQTa). These transit services include Metro local and rapid bus routes that serve the Project area along Wilshire Boulevard, as well as LADOT DASH Fairfax shuttle service. The Project Site will ultimately be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. The Project would promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces.

The Project design includes “green” principles that would reduce trips and VMT as compared to a project in a less urban area with less transportation infrastructure. These relative reductions in vehicle trips and VMT from a standard project elsewhere in the Air Basin help quantify the criteria pollutant emissions reductions by locating the Project in this infill, HQTa area with substantial transportation infrastructure.

Previously, trip generation for land uses was calculated based on data from the Institute of Transportation Engineers (ITE). However, ITE rates were based on data from suburban, single-use, freestanding sites that may not be representative of urban infill environments. A recent USEPA study found that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and access to bicycle and walking infrastructure. USEPA developed equations known as the EPA Mixed Use Development (MXD) model to calculate trip reductions for multi-use developments.³¹ LADOT’s VMT Calculator incorporated the MXD model and accounts for project features like increased density and proximity to public transit, which would reduce VMT and fuel use when compared to free-standing sites.

As demonstrated in the following analyses, the Project would not result in significant regional emissions. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP.

The Project Site is classified as “Regional Commercial” in the General Plan Framework and the Community Plan, a classification that allows housing, retail, restaurants, and commercial uses, such as those proposed by the Project. As such, the RTP/SCS’ assumptions about growth in the City accommodate housing growth on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City’s General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region’s air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region’s emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

City of Los Angeles Policies

The Project would offer convenient access to public transit and opportunities for walking and biking (including the provision of bicycle parking), thereby facilitating a reduction in VMT. In addition, the

³¹ U.S. Environmental Protection Agency, Mixed Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model.

Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit. These transit services include Metro local bus service (i.e., Lines 20 and 720, which have been merged under Metro’s NextGen Plan on Wilshire Boulevard),³² AVTA Line 786, and LADOT DASH Fairfax shuttle service. The Project Site will ultimately be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. The Project would promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces.

The City’s General Plan Air Quality Element identifies policies with specific strategies for advancing the City’s clean air goals. As illustrated in Table 6.III-3, the Project would not conflict with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

**Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	No Conflict. The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	No Conflict. The Project would minimize particulate emissions from unpaved facilities through best practices and/or SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	No Conflict. The Project would include employees in the commercial, retail, and restaurant uses, some of whom could benefit from alternative commute arrangements. There is substantial transit infrastructure in the vicinity of the Project, including Metro local bus service (i.e., Lines 20 and 720 on Wilshire Boulevard), AVTA Line 786, and LADOT DASH Fairfax shuttle service. The Project would also be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. Further, the Project would also promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces. In addition, the Project would comply with building code requirements for pre-wiring and installation of electric vehicle charging stations. The Project would include a TDM program to reduce both daily and peak hour trips to and from the Project Site. The program would be overseen by a TDM coordinator who would assist with the development, operation, and implementation of the various programs, including but not limited to, carpool incentives, rideshare matching, bicycle lockers, and variable work shifts. It would also

³² Metro NextGen Bus Plan, <https://la-metro.maps.arcgis.com/apps/MapSeries/index.html?appid=8decc337ba35474ba28d0b4e9ad71647>, accessed June 2, 2022.

**Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
	include a co-working space on the 5 th floor and library on the 4 th floor to provide additional capacity for telecommuting.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	No Conflict. The Project includes commercial, retail, and restaurant jobs, which are not likely to utilize telecommuting. However, Project amenities also include shared workspace area on the 5 th floor and a library on the 4 th floor, so it is possible that Project residents could utilize these spaces for telecommuting, thereby reducing work trips.
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.	No Conflict. The Project would include employees in the commercial, retail, and restaurant uses, some of whom could benefit from trip reduction plans and incentives. There is substantial transit infrastructure in the vicinity of the Project, including Metro local bus service (i.e., Lines 20 and 720 on Wilshire Boulevard), AVTA Line 786, and LADOT DASH Fairfax shuttle service. The Project would also be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. Further, the Project would also promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces. In addition, the Project would include pre-wiring for electric vehicle charging stations to support the use of zero-emission vehicles. The Project would also include a TDM program to reduce both daily and peak hour trips to and from the Project Site. The program would be overseen by a TDM coordinator who would assist with the development, operation, and implementation of the various programs, including but not limited to, carpool incentives, rideshare matching, bicycle lockers, and variable work shifts.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	No Conflict. The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	No Conflict. The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses, and is located close to Metro, bus and other transit lines, as well as providing new commercial and residential uses in an area designated a Regional Center by the Community Plan.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	No Conflict. The Project's design and location would help incentivize public transit use, active transportation, and use of alternative fuel vehicles. There is substantial transit infrastructure in the vicinity of the Project, including Metro local bus service (i.e., Lines 20 and 720 on Wilshire Boulevard), AVTA Line 786, and LADOT DASH Fairfax shuttle service. The Project would also be within 0.25 miles to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. Further, the Project would also promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28

**Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
	short-term bicycle parking spaces. In addition, the Project would include pre-wiring for electric vehicle charging stations.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	No Conflict. The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	No Conflict. The Project's design and location would help incentivize public transit use as well as active transportation, such as walking or biking. There is substantial transit infrastructure in the vicinity of the Project, including Metro local bus service (i.e., Lines 20 and 720 on Wilshire Boulevard), AVTA Line 786, and LADOT DASH Fairfax shuttle service. The Project would also be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. Further, the Project would also promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces. In addition, the Project would include pre-wiring for electric vehicle charging stations. The Project would also include a TDM program to reduce both daily and peak hour trips to and from the Project Site. The program would be overseen by a TDM coordinator who would assist with the development, operation, and implementation of the various programs, including but not limited to, carpool incentives, rideshare matching, bicycle lockers, and variable work shifts.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	No Conflict. The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements, involving construction and demolition reduction and recycling programs, on-site recycling programs for occupants during operation, and compliance with measures to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors. Other solid waste requirements include SB 1383, which calls for reducing the landfilling of organic wastes.
Source: DKA Planning, 2022.	

As the Project is consistent with the applicable air quality plan (i.e., 2022 AQMP), it would not substantially contribute to the cumulative increase in the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2022 AQMP. Additional discussion about the Project's impact on existing air quality violations is discussed in the next section.

Likewise, the Project would not exceed the population, housing, and jobs assumptions utilized in preparing the AQMP's emissions inventories. The Project is consistent with control measures and strategies in the 2022 AQMP, which largely target technological advancements in controlling stationary source and mobile source emissions. As discussed below, Project construction and operational impacts would not be considered significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD LSTs for NO₂, CO, and PM₁₀ were initially published in June 2003 and revised in July 2008.³³ The LSTs for PM_{2.5} were established in October 2006.³⁴ Updated LSTs were published on the SCAQMD website on October 21, 2009.³⁵ Table 6.III-4 presents the significance criteria for both construction and operational emissions.

**Table III-4
SCAQMD Emissions Thresholds**

Criteria Pollutant	Construction Emissions		Operation Emissions
	Regional	Localized /a/	
Volatile Organic Compounds (VOC)	75	--	55
Nitrogen Oxides (NO _x)	100	74	55
Carbon Monoxide (CO)	550	680	550
Sulfur Oxides (SO _x)	150	--	150
Respirable Particulates (PM ₁₀)	150	5	150
Fine Particulates (PM _{2.5})	55	3	55

/a/ Localized significance thresholds assumed a 1-acre and 25-meter (82-foot) receptor distance in the Central LA source receptor area. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008).. The SCAQMD has not developed LST values for VOC or SO_x.
Source: SCAQMD.

Construction

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.17 model using assumptions from the Project's developer, including the Project's construction schedule of approximately three years (36 months). Table 6.III-5 summarizes the estimated construction schedule that was modeled for air quality impacts (see Appendix A-1 of this Initial Study for the modeling outputs).

³³ SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

³⁴ SCAQMD, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

³⁵ SCAQMD, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009.

**Table III-5
Estimated Construction Schedule**

Phase	Duration	Notes
Demolition	Month 1	850 tons of building and 1,300 tons of asphalt demolished and hauled in 10-cubic yard capacity trucks up to 30 miles away
Site Preparation	Month 2	Removal of utilities and other on-site improvements
Grading	Months 3-7	152,032 cubic yards of soil export hauled up to 30 miles away in 10-cubic yard capacity trucks
Drainage/Utilities/Trenching	Month 5	Trenching for utilities, including gas, water, electricity, and telecommunications.
Foundations/Concrete Pour	Months 5-6	Foundation work
Building Construction	Months 6-36	Concurrent construction of the tower and podium structures, exterior skin, and buildout
Paving	Months 25-36	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 8-36	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2022.		

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

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 1138, which requires the use of catalytic oxidizer controls for any restaurant that includes chain-driven charbroilers.
- SCAQMD Rule 1174 controls VOC emissions from barbecue charcoal.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities. NO_x emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions (see Appendix A for an inventory of equipment types, number, usage hours, horsepower, and load factors). The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Air quality emissions would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle.

During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), impacts are generally lesser than during grading because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized.

As stated above, it is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.

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

As shown in Table 6.III-6, construction of the Project would produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions which do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

**Table III-6
Estimated Daily Construction Emissions**

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2024	3.6	64.9	41.8	0.2	14.7	6.3
2025	4.6	62.6	59.9	0.2	16.9	6.0
2026	2.8	17.0	40.1	<0.1	5.7	1.7
2027	37.3	17.9	47.6	0.1	7.4	2.1
Maximum Regional Total	37.3	64.9	59.9	0.2	16.9	6.3
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	N/A	15.9	15.4	N/A	3.5	2.2
Localized Threshold	N/A	74	680	N/A	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions) Source: DKA Planning, 2023 based on CalEEMod 2023.1.1.17 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Modeling sheets included in Appendix A-1.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.³⁶ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2019-2021) for the Project area.

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central Los Angeles SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences adjacent to the Project Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in Table 6.III-6, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD.

³⁶ SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

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

This analysis determined that Project impacts with respect to air quality (both regional and localized) during construction would be less than significant. Therefore, no mitigation measures would be required. Nevertheless, as the Project includes a construction period of longer than 18 months and is located within 500 feet of a residence or other sensitive receptor, the Project would implement Mitigation Measure 4.2-3 from the City’s Housing and Safety Element EIR, which would further ensure that Project impacts are less than significant during construction.

Operation

Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality emissions primarily from motor vehicles that access the Project Site. As shown in Table 6.III-7, the Project would result in a slight increase in pollutant emissions when compared to existing conditions. Nevertheless, the Project’s net emissions would not exceed the SCAQMD’s regional or localized significance thresholds. The Project’s operational impacts on long-term air pollution would therefore be considered less than significant. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

**Table III-7
Estimated Daily Operational Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	14.2	0.3	28.6	<0.1	<0.1	<0.1
Energy Sources	0.1	1.0	0.5	<0.1	0.1	0.1
Mobile Sources	6.2	3.8	43.5	0.1	9.3	2.4
Regional Total	20.5	5.1	72.6	0.1	9.4	2.5
Existing Sources	-7.6	-4.5	-49.6	-0.1	-8.3	-2.2
Net Regional Total	12.9	0.6	23.0	<0.1	1.1	0.3
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	N/A	0.1	27.4	N/A	0.3	0.3
Localized Significance Threshold	N/A	74	680	N/A	2	1
Exceed Threshold?	N/A	No	No	N/A	No	No
LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Localized emissions represent area and energy sources. Source: DKA Planning, 2022 based on CalEEMod 2022.1.1.17 model runs (included in Appendix A-1).						

Mitigation Measure

The Project would implement Mitigation Measure 4.2-3 from the Housing and Safety Element EIR, which is provided below, and which would further ensure that Project impacts during construction are less than significant:

MM 4.2-3 Construction TAC Reduction Measures

For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with all mitigation measures in the mitigation plan.

Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The SCAQMD has categorized the following land uses as sensitive to air pollution: hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes. Figure 6-2, provided above, shows the sensitive receptors within 1,000 feet of the Project Site.

Construction

Criteria Pollutants

The localized construction air quality analysis was prepared using methodologies recommended by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine LSTs for the Project. LSTs represent the maximum emissions from a project that would not cause or contribute to a localized exceedance of the most stringent federal or State ambient air quality standard and are based on the most recent background ambient air quality monitoring data for the Project area. Despite the general improvement in ambient air quality for the Project area, the LST analysis did not apply any expected reduction in background pollutant concentrations for the construction period (2024-2027). As such, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent, making this analysis more conservative.

The CalEEMod model was used to calculate maximum on-site construction emissions for localized pollutants for the Central Los Angeles SRA based on a one-acre site. Though the Project Site is more than one acre (i.e., approximately 57,486 square feet), the one-acre LSTs were used pursuant to SCAQMD guidance to ensure a more conservative analysis that is more protective of public health.

Localized emissions impacts were evaluated based on the proximity of the closest off-site receptors, which are the residences approximately five feet north of the Project Site. The closest receptor distance identified by the SCAQMD's look-up tables is 25 meters (82 feet). Pursuant to SCAQMD guidance, the 25-meter LSTs were used as the basis for the significance findings.

As shown in Table 6.III-6, above, during construction of the Project, maximum daily localized unmitigated emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are generally within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

Toxic Air Contaminants

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction.³⁷ Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology (see also Figure 6-1, provided above). The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 36 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

³⁷ More than 90 percent of diesel particulate matter is less than 1 micron in diameter and is a subset of PM_{2.5}, which is the most inhalable subset of particulate matter. As a statewide average, diesel particulate matter makes up eight percent of outdoor PM_{2.5}. Source: California Air Resources Board, Overview: Diesel Exhaust and Health. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>

Operation

Criteria Pollutants

During operation, the Project would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, and PM₁₀ at nearby sensitive receptors from area and energy sources. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot. When the Project is operational in 2027, the highest volume of trips at any intersection analyzed in the traffic impact analysis would be the intersection of Wilshire Boulevard and Cochran Avenue, where 3,277 vehicles would travel this intersection in the peak PM hour. Assuming peak hour volumes represent ten percent of daily volumes, this intersection would carry 32,770 daily vehicle trips, well below the daily traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.³⁸

Toxic Air Contaminants

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

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.³⁹ The Project would

³⁸ South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

³⁹ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

not include distribution facilities or generate such volume and type of truck trips, and is not considered to be a substantial source of DPM warranting a refined HRA, inasmuch as daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

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

Therefore, the Project's operational impacts on local sensitive receptors would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The SCAQMD's *CEQA Air Quality Handbook* identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not result in activities that create objectionable odors. The Project is a mixed-use development with housing and commercial uses that would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses, such as restaurants and residences. As a result, any odor impacts from the Project would be considered less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

Cumulative Impacts

Construction

Construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impact would result in a cumulatively considerable increase in emissions for those pollutants and precursors for which the Air Basin is designated non-attainment. As summarized in Table 6.III-6, above, the Project's construction-related emissions would not exceed the SCAQMD's thresholds of significance. As a result, the Project would not result in a significant cumulative impact due to construction-related emissions.

With regard to localized air quality impacts, the Project would have a less than significant impact with respect to NO_x, CO, PM₁₀, and PM_{2.5} emissions, as the Project's emissions would be lower than the respective LSTs established by the SCAQMD (see Table 6.III-6). Therefore, the Project's contribution

to localized cumulative air quality impacts would not be cumulatively considerable and would be less than significant.

As discussed above, the Project's construction activities would not expose sensitive receptors to substantial pollutant concentrations of criteria pollutants or TACs. Therefore, the Project's contribution to cumulative TAC impacts during construction would not be cumulatively considerable and cumulative impacts would be less than significant.

Operation

Pursuant to SCAQMD guidance, an individual project that exceeds SCAQMD's recommended mass emission thresholds of significance would also result in a cumulatively considerable net increase of criteria pollutants. As illustrated above, the Project's operational air quality impacts (i.e., regional, localized, TACs) would be less than significant. As such, the Project's emissions of non-attainment pollutants and ozone precursors would not be cumulatively considerable.

In addition, neither the Project nor any of the related projects would represent a substantial source of TAC emissions, which are typically associated with large industrial, manufacturing, and trucking hub projects. Both the Project and related projects could generate negligible TAC emissions from consumer products, landscaping equipment, and other intermittent sources. Pursuant to AB 1807, SCAQMD has promulgated several rules that address such TAC emissions, which will continue to reduce overall TAC emission. As a result, cumulative TAC emissions during long-term operations would be less than significant.

IV. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

This analysis is based in part on the following:

Appendix B Tree Report, 5401-5407 Wilshire Boulevard, Carlberg Associates, October 17, 2021.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with two commercial buildings and surface parking. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Project Site and there are no sensitive habitats present. The 11 existing trees on the Project Site would not be sufficient and are not documented to support candidate, sensitive, or special status species identified in local or regional plans, policies, or regulations. Therefore, the removal of the existing trees would not constitute habitat modification. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with two commercial buildings and surface parking. There are no riparian areas located on or adjacent to the Project Site.⁴⁰ Further, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or the County of Los Angeles.^{41,42} In addition, there are no sensitive communities on or adjacent to the Project Site as identified by the CDFW or the USFWS.^{43,44} Therefore, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

⁴⁰ NavigateLA, Water, Lakes, and Streams layer: <http://navigateLA.lacity.org/navigateLA/>, February 13, 2020.

⁴¹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, page 2-18-4.

⁴² Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

⁴³ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://apps.wildlife.ca.gov/bios/>, accessed November 3, 2021.

⁴⁴ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed November 3, 2021.

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?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with two commercial buildings and surface parking. The Site does not contain wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board. In addition, a review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.⁴⁵ Thus, the Project would not have a substantial adverse effect on state or federally protected wetlands, and Project impacts would be less than significant. No mitigation measures would be required and further analysis of this topic in the EIR is required.

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

Less Than Significant with Mitigation Incorporated. The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with two commercial buildings and surface parking. The Project Site currently does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed and does not contain any major water bodies that would contain or support habitat for native resident or migratory bird species. According to the tree report prepared for the Project Site (included in Appendix B of this Initial Study), the Project Site contains 11 trees, which may potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that “it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise permitted by this code or any regulation made pursuant thereto.” To ensure compliance with the MBTA and the California Fish and Game Code, tree removal activities would take place outside of the nesting season (February 1 through August 31), to the extent feasible. In addition, should vegetation removal activities take place during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist) would be established until the fledglings have left the nest or until the monitoring biologist has determined that the nest has failed. To ensure that impacts with respect to nesting and migratory birds are less than significant, the Project would incorporate the second and third paragraphs of Mitigation Measure 4.3-1(b), provided below, from the City’s Housing and Safety Element EIR. The first paragraph of this mitigation measure is not applicable to the Project. No further analysis of this topic in the EIR is required.

⁴⁵ U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>

Mitigation Measure

As stated above, the Project would implement the relevant portions of Mitigation Measure 4.3-1(b) from the Housing and Safety Element EIR, which are provided below:

MM 4.3-1(b) Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist.

Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

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)?

Less Than Significant Impact. Local ordinances protecting biological resources are limited to the City of Los Angeles' Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica* var. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).⁴⁶ In addition, as of February 4, 2021, Mexican Elderberry (*Sambucus nigra* ssp. *caerulina*) and Toyon (*Heteromeles arbutifolia*) were added as protected trees.⁴⁷ According to the tree report prepared for the Project Site (included as Appendix B to this IS), none of the 11 trees located on the Project Site are protected trees under the City's Protected Tree Ordinance. The Project would remove all existing trees on the Project Site.

⁴⁶ City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.

⁴⁷ City of Los Angeles, Ordinance 186873, approved December 28, 2020 and effective February 4, 2021.

Further, there are no existing street trees located along the Project Site frontage on Wilshire Boulevard, Cochran Avenue, and Cloverdale Avenue. As none of the trees located on the Project Site are protected trees, and as there are no street trees that would be removed, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with two commercial buildings and surface parking. The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area.^{48, 49} Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. Therefore, the Project would not conflict with any habitat conservation plans and Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

⁴⁸ NavigateLA, Significant Ecological Area layer: <http://navigateLA.lacity.org/navigateLA/>, February 13, 2020.

⁴⁹ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based in part on the following:

Appendix C Archaeological Resources Assessment for the 5407 Wilshire Boulevard Project, SWCA Environmental Consultants, August 2023.

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

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines defines historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The Project Site is located within the boundaries of the Miracle Mile Historic District, which was formally determined eligible for listing in the National Register of Historic Places in 1983 and is, therefore, listed in the California Register of Historical Resources. SurveyLA is the Citywide historic resources survey, which consisted of field surveys conducted from 2010 through 2017, and which provides baseline information on potential historic resources throughout the City. Neither of the existing buildings (at 5401 and 5407 Wilshire Boulevard) were identified by SurveyLA as potentially eligible for individual designation on a historic register. The existing building at 5407 Wilshire Boulevard is a non-contributing building to the Miracle Mile Historic District, while the building at 5401 Wilshire Boulevard is a contributing building to the Historic District. The Project would demolish the

existing buildings, while preserving the south- and east-facing façades of the 5401 Wilshire Boulevard building, which would be rehabilitated as part of the Project. Project impacts with respect to historic resources would therefore be potentially significant and will be analyzed further in the EIR. The analysis provided in the EIR will include a historical resource evaluation, consistent with Mitigation Measure 4.4-1(a) from the City's Housing and Safety Element EIR.

Mitigation Measure

MM 4.4-1(a) Identification of Built-Environment Historic Resources

For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.

The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified.

If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history.
- The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.

Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features

shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j).

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

Less Than Significant with Mitigation Incorporated. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

Regulatory Setting

State

In terms of archaeological resources, PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Local

City of Los Angeles General Plan

The Conservation Element of the City of Los Angeles General Plan, adopted in September 2001, contains an objective (II-5) to protect the City’s archaeological resources for historical, cultural, research and/or educational purposes. The Conservation Element establishes a policy to “continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition of property modification activities” (City of Los Angeles 2001:II-5–6).

The following discussion is based on the Archaeological Resources Assessment (Archaeological Report) prepared by SWCA Environmental Consultants, included in Appendix C of this Initial Study.

Methodology

CHRIS Records Search

As part of the Archaeological Report, on December 5, 2018, SWCA Environmental Consultants conducted a confidential search of the California Historical Resources Information System (CHRIS) records at the South Central Coastal Information Center (SCCIC) on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.5-mile radius of the Project Site (see Appendix C of this Initial Study). The SCCIC maintains records of previously documented archaeological resources and technical studies; it also maintains copies of the OHP's portion of the Historic Resources Inventory.

Sensitivity Assessment

According to the Archaeological Report, where a known archaeological resource is not present within a specified area, the potential for the presence of an unidentified resource in the form of a buried archaeological site is assessed. That determination considers historical use of the Project vicinity broadly, and the physical setting specifically, including an assessment of whether the setting is capable of containing buried archaeological material. Lacking any testing specifically gathered to assess the presence or absence of archaeological material below the surface, the resulting sensitivity is inherently qualitative, ranging from an increasing probability of "low" to "moderate" to "high" for encountering such material.

The Archaeological Report assessed the sensitivity of the Project Site to contain prehistoric and Historic-period Native American archaeological resources, as well as Historic-period non-Native American archaeological resources. Specific factors are considered for each respective resource type. Favorable habitation by past Native Americans is indicated by proximity to natural features (e.g., perennial water source, plant or mineral resource, animal habitat) and other known Native American archaeological sites, flat topography, prominent viewsheds, and relatively dry conditions.

Search Results

CHRIS Records Search

The CHRIS records search identified a total of four previously documented cultural resources within a 0.5-mile radius of the Project Site. None of the identified resources are within the Project Site. Resources identified in the 0.5-mile radius include three archaeological sites (P-19-000159, P-19-001261, and P-19-002964) and Hancock Park (P-19-171007). P-19-000159 includes Native American human remains, commonly known as the La Brea Woman, recovered in 1915 from asphalt seeps in the La Brea Tar Pits, approximately 0.4 mile west of the Project Site. P-19-001261 is a Historic-period refuse pit identified near the prehistoric site in the La Brea Tar Pits. P-19-002964 consists of an early-twentieth-century refuse scatter and brick foundation feature documented during construction monitoring for the Park La Brea housing development on the south side of Third Street between the Project Site and Hauser Boulevard. P-19-171007 is the site of Hancock Park, which is

recognized for the paleontological materials at the La Brea Tar Pits and the park as part of the Historic-period built environment.

Sacred Lands File Search

The results of a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) indicated negative results.

Archival Research

Archival research conducted as part of the Archaeological Report included a review of historical maps for the Project Site and vicinity and focused on documenting modifications to the physical setting and identifying any potential natural or artificial features with relevance to use by Native Americans (e.g., stream courses, vegetation, historical topography, roads, habitation markers) or use of the location by non-Native American people in the Historic period. One important landmark was the *brea* (“tar”) pits, now known as the La Brea Tar Pits, located approximately 0.4 mile west of the Project Site. Asphaltum—the naturally formed substance found in seeps—was an important resource to Native American populations, who used it as a binding and waterproofing element. The asphaltum at the La Brea Tar Pits would have been accessed via footpaths from neighboring camp and village sites, including Yaanga and Geveronga, located east of the Project Site. Though no reliable maps exist showing the precise location of such Native American travel routes, it is likely that many of the routes designated by the Spanish, Mexican, and American inhabitants followed some of the same alignments.

Review of Sanborn maps, newspaper articles, and building permits document the development of the Project Site as an industrial and commercial block within La Brea and its conversion to its current use as a commercial building and parking lot. In the nineteenth century the property was primarily grazing land, but by 1920, topographic maps show the vicinity of the Project heavily developed with oil wells drilling for the Salt Lake Oilfield, but none within the Project Site. By 1926, most of the oil derricks had been removed, and some buildings begin to appear on maps and aerial photos. Before that, the 1926 Sanborn map only shows the area as part of proposed lots on the Sanborn index maps, with the notation that they would be inserted once the properties were subdivided and the area was sufficiently developed. A 1938 aerial shows the three commercial buildings, indicating that the extant buildings were part of the original development of the Project Site. The fourth extant building was built in the 1950s and is visible in a 1956 aerial. The first Sanborn maps showing the Project Site from 1950 represent its development alongside commercial buildings and nearby parcels heavily developed with multi-family homes and apartments.

Project Impacts

A CHRIS records search and archival research identified four previously recorded resources within a 0.5-mile radius of the Project Site. None of the resources are within the Project Site, although significant prehistoric archaeological materials were recovered from the La Brea Tar pits, located approximately 0.4 mile to the west of the Project Site. The NAHC’s SLF search did not identify any sacred sites or sensitive locations. The nearest Native American settlements and placenames

identified in ethnographic literature are between 5.9 and 7.5 miles from the Project Site. Other unnamed Native American settlements are known to have been present along the former course of the Los Angeles River (now Ballona Creek), located approximately 2.8 miles south of the Project Site. The La Brea Tar Pits served as an important source of asphaltum for Native Americans dating back at least 10,000 years. Other water features, including perennial springs and small wetlands, are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains within approximately 1.9 to 3.1 miles of the Project Site and would have been frequented by Native Americans. Mid- and late-twentieth-century maps show that a relatively small south-flowing stream was once located approximately 984 feet to the west. The stream appears to have been intermittent or ephemeral and only contained water during the wet season for short periods of time.⁵⁰ Due to the general proximity to these natural resources, especially the asphaltum source, the Project Site is considered to be in a general area that was actively used by Native Americans; however, background research did not identify any substantial evidence to suggest that the Project Site was a specific area of concentrated Native American activity, such as a seasonal camp or resource-gathering site. Given the subsequent Historic-period developments within the Project Site, it is unlikely that any artifacts or features associated with Native American activities that may have once been present on the surface would have been preserved. Given these findings, the sensitivity for prehistoric archaeological resources is considered low. A separate analysis of the potential for tribal cultural resources to be encountered at the Project Site is provided separately, in Section XVIII, Tribal Cultural Resources.

According to the Archaeological Report,⁵¹ archival research documents the land use history of the Project Site and its transition from use in livestock grazing in the mid-nineteenth century, to industrial properties in the 1890s, and to primarily commercial uses by the 1940s. As part of James Thompson's leased ranch land, the Project Site appears to have been used primarily for livestock grazing, most likely sheep but potentially cattle as well. Maps dated 1870 and 1880 show a south-flowing stream located approximately 1 mile west of the Project Site. The record of industrial uses on the Project Site originated in the 1890s with the discovery of the Salt Lake Oilfield. Aerial photographs from the late 1920s show widespread ground disturbances in the area resulting from the oil operation, which included the excavation of the wells and storage tanks and extensive grading for creation of the structures and vehicle travel. The Project Site was undeveloped at this time, but the surrounding area was being developed as single-home residential neighborhoods with commercial structures along Wilshire Boulevard. By 1938, the Project Site was developed with three of the existing buildings, with the fourth constructed by 1956. According to the Archaeological Report, building construction from this time period would have likely destroyed most types of Historic-period archaeological deposits from the preceding decades, such as a trash pit or building foundations.⁵² The presence of Historic-period artifacts or features that predate the construction of the extant buildings on the Project Site

⁵⁰ Archaeological Resources Assessment, SWCA Environmental Consultants, August 2023, page 21 (included as Appendix C to this Initial Study).

⁵¹ Archaeological Resources Assessment, SWCA Environmental Consultants, August 2023, page 22 (included as Appendix C to this Initial Study).

⁵² Archaeological Resources Assessment, SWCA Environmental Consultants, August 2023, page 22 (included as Appendix C to this Initial Study).

cannot be completely ruled out, but the likelihood of such materials being preserved is considered low.

The Project requires the excavation of the underlying alluvial sediments and the removal of the overlying artificial fill. According to the Archaeological Report, the potential for unidentified archaeological resources at the Project Site is found to be low. As discussed previously, the Project would implement Mitigation Measure MM 4.4-2, provided below, from the City's Housing and Safety Element EIR. Therefore, in the event that any archaeological resources are discovered during grading, excavation, or other soil-disturbing activities, implementation of MM 4.4-2 would ensure that Project impacts with respect to archaeological resources are less than significant.

Mitigation Measure

MM 4.4-2 Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.

- A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).
- B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.
- C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.
- D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.
- E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined

using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.

- F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (<http://ohp.parks.ca.gov/pages/1054/files/armr.pdf>).
- G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.
- H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.
- I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around

the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

- K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

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

Less Than Significant Impact. Although the Project Site has been subject to grading and development in the past, the Project would require excavations below ground surface. A significant adverse effect could occur if grading or excavation activities associated with a project could disturb human remains. As discussed above, no human remains are known to exist at the Project Site. Although unlikely, there is a possibility that human remains could be encountered during excavation and grading activities, which is a potential significant impact. Should human remains inadvertently be encountered, the Project would comply with the existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. State Health and Safety Code Section 7050.5 requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains, pursuant to Public Resources Code Section 5097.98. Compliance with existing regulations described above would ensure appropriate treatment of any potential human remains discovered during construction grading and/or excavation activities. Therefore, the Project’s impacts on human remains would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

VI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

Appendix H Utility Infrastructure Technical Report, Mirabel Project, KPFF Consulting Engineers, February 2023.

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. This analysis relies on Appendix F of the CEQA Guidelines, which was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.”

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* includes the following factors used on a case-by case basis to determine significance:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following eight factors will be considered in determining whether this threshold of significance is met:

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

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and
8. Whether the project conflicts with adopted energy conservation plans.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

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

Construction

Electricity

Project construction would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, electricity may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction. Moreover, construction electricity usage would replace the electricity usage associated with the existing buildings. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

Construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project

construction activities, and thus there would be no natural gas demand during construction of the Project.

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.⁵³ In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, refrigeration, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown on Table VI-1, the Project's demand for electricity would be approximately 1,694,031 kWh per year. As shown on Table VI-2, the Project's demand for natural gas would be approximately 3,639,332 kBTU per year.

⁵³ California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

**Table VI-1
Project Estimated Electricity Demand**

Land Use	Size	Total (kw-h/yr)¹
Proposed Uses		
Residential	348 du	1,131,947
Retail	7,378 sf	68,873
Restaurant	5,443 sf	171,184
Enclosed Parking	478 spaces	705,802
Subtotal Proposed		2,077,806
Existing Uses (to be removed)		
Retail	38,545 sf	383,775
Subtotal Existing (to be removed)		(383,775)
Project Total (Proposed – Existing)		1,694,031
du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year		
¹ Calculated via CalEEMod version 2022.1.1.17 and incorporated into Utility Infrastructure Report, which is included in Appendix H of this Initial Study.		

**Table VI-2
Project Estimated Natural Gas Demand**

Land Use	Size	Total (kBTU/yr)¹
Proposed Uses		
Residential	348 du	3,090,301
Retail	7,378 sf	36,029
Restaurant	5,443 sf	513,002
Enclosed Parking	478 spaces	0
Subtotal Proposed		3,639,332
Existing Uses (to be removed)		
Retail	38,545 sf	189,801
Subtotal Existing (to be removed)		(189,801)
Project Total		3,449,531
du = dwelling unit sf =square feet kBTU = 1,000 British Thermal Units yr = year		
¹ Calculated via CalEEMod version 2022.1.1.17 and incorporated into Utility Infrastructure Report, which is included in Appendix H of this Initial Study.		

Electricity

With compliance with Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 1,694,031 kWh per year (refer to Table VI-1). The California Renewables Portfolio Standard (RPS) program required public and investor-owned utilities in California to receive at least 33 percent of electricity from renewable sources by 2020. SB 350 further required 50 percent

renewables by 2030. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 34.9 percent of LADWP’s overall energy mix in 2020.⁵⁴ This represents the available off-site renewable sources of energy that would meet the Project’s energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs. SB 350 further required 50 percent renewables by 2030. In addition, the Green New Deal establishes the following goals: 55% of power retail sales from renewable energy sources by 2025; 80% by 2036; and 100% by 2045.

Based on LADWP’s 2017 SLTRP, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (encompassing the Project’s 2027 buildout year) is estimated to be approximately 23,807 GWh of electricity⁵⁵ As such, the Project-related increase in annual electricity consumption of 1,694,031 kWh per year would represent approximately 0.007 percent of LADWP’s projected sales in 2027.

Natural Gas

With compliance with Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project is projected to generate an increase in the on-site demand for natural gas totaling approximately 3,449,531 kBTU per year, or approximately 9,451 cf per day.⁵⁶ Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas’s planning area will be approximately 2,261 million cf per day in 2027 (the Project’s buildout year).⁵⁷ The Project would account for approximately 0.0004 percent of the forecasted 2027 consumption in SoCalGas’s planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City’s Green Building Code to reduce energy usage.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. Petroleum-based fuels currently account for more than 90 percent of California’s transportation fuel use.⁵⁸ However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC

⁵⁴ LADWP, Power Content Label, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel.jsessionid=Ld1LvppwPXtpwfKpfn65sQcnmchNvIX5xNm13hS5WRDKJjWlHY2Vn!455318738?_afLoop=937924243040778&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D937924243040778%26_afWindowMode%3D0%26_adf.ctrl-state%3D2q0qi6hk_4, accessed June 6, 2022.

⁵⁵ 2017 Power Strategic Long-Term Resource Plan, December 2017, LADWP, Appendix A.

⁵⁶ Assuming 1 kBTU = 1 cf.

⁵⁷ California Gas and Electric Utilities, 2020 California Gas Report, p. 145.

⁵⁸ California Energy Commission, 2016-2017 Investment Plan Update for the Alternative and renewable Fuel and Vehicle Technology Program, May 2016.

predicts that the demand for gasoline and transportation fossil fuels in general will continue to decline over the next 10 years primarily due to improvements in fuel efficiency and increased electrification.⁵⁹ According to fuel sales data from the CEC, fuel consumption in Los Angeles County was approximately 3.56 billion gallons of gasoline and 0.59 billion gallons of diesel fuel in 2019.⁶⁰

The Project would result in approximately 4,745,365 VMT per year.⁶¹ Assuming 91% of the Project's fuel demand is for gasoline,⁶² and assuming an average fuel efficiency of 23.68 miles per gallon (mpg), the Project would result in the demand for approximately 182,360 gallons of gasoline per year, which is approximately 0.005 percent of the County fuel consumption in 2019. Assuming the remaining 9% of the Project's fuel demand is for diesel, and assuming an average fuel efficiency of 9.43 mpg, the Project would result in the consumption of approximately 45,290 gallons of diesel per year, which is approximately 0.008 percent of the County diesel consumption in 2019.

As noted previously, the Project Site is located in an HQTAs designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. The Project Site is within 625 feet of the entrance to the new Metro D Line station at Wilshire Boulevard and La Brea Avenue. Metro Line 20 travels along Wilshire Boulevard and includes a stop for westbound service adjacent to the Project Site (about mid-block between Cochran Avenue and Cloverdale Avenue) along with an eastbound service stop located across Wilshire Boulevard at the southwest corner of its intersection with Cloverdale Avenue. Metro Rapid Bus Line 720 is a limited-stop express bus that shares Project-serving stops with Metro Line 20. Metro Local Bus Line 212 travels north-south on La Brea Avenue between Hawthorne and Hollywood, where it connects to the Metro B Line. During peak hours, the Metro Bus Line 312 operates on the same route but with limited stops between Obama Boulevard and Sunset Boulevard, providing faster and more reliable transit service. Additionally, the Los Angeles Department of Transportation (LADOT) operates the Fairfax DASH bus route, which stops in front of the Project Site. This route connects the Project to local destinations such as Cedars-Sinai Medical Center, the Beverly Center, the Grove, LACMA, and West Hollywood. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for residents and guests.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order to provide a more representative trip generation

⁵⁹ California Energy Commission, 2019 Integrated Energy Policy Report, p. 228.

⁶⁰ California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020.

⁶¹ Calculations contained in Appendix A-1 of this Initial Study (AQ Modeling, see Section 5.9, Operational Mobile Sources).

⁶² California Energy Commission, 2016-2017 Investment Plan Update for the Alternative and renewable Fuel and Vehicle Technology Program, May 2016.

rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments. The LADOT VMT calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in the Transportation Assessment (contained in Appendix G-1 of this Initial Study), incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption (see specifically, VMT calculator worksheets contained in Appendix E of the Transportation Assessment).

During Project operations, vehicles traveling to and from the Project Site are also assumed to comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. It is anticipated that the future Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption, as described previously. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy supplies or require new capacity in the years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.008 percent of LADWP's projected sales in 2026-2027, the year of full buildout. Also, the Project's estimated increase in demand for natural gas would account for approximately 0.0004 percent of the forecasted 2027 consumption in SoCalGas's planning area. As discussed previously, the Project would result in approximately 0.005 percent of the County fuel and approximately 0.007

percent of the County diesel consumption, when compared to 2019 consumption. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's and SoCalGas's service provisions. The nominal consumption would therefore not impact supplies or require new capacity; because, as discussed above LADWP and SoCal Gas have sufficient supplies to meet project demand.

3) *The effects of the project on peak and base period demands for electricity and other forms of energy.*

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,432 MW on August 31, 2017.⁶³ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. This is the minimum amount of electricity required to meet typical peak demand conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.⁶⁴ In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.004 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.⁶⁵ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) *The degree to which the project complies with existing energy standards.*

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage during Project operations presented on Table VI-1 and VI-2 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

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

⁶³ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

⁶⁴ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

⁶⁵ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) *Effects of the Project on Energy Resources*

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2017 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada. According to the U.S. Energy Information Administration (EIA), as of January 2019, the United States currently has about 84 years of natural gas reserves.⁶⁶ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. In addition, as a Project that primarily consists of residential uses with associated local-serving retail and restaurant uses, the Project would use less natural gas than a different type of use (such as an industrial or data center use). Therefore, Project construction and operational activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.⁶⁷ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. In addition, the Project would comply with the City's Green Building Code with respect to EV-charging (by providing EV-charging stations at 10 percent of the total parking spaces with an additional 30 percent of parking spaces being EV-ready). Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, while the Project Site is located in a Methane Zone, and while methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would

⁶⁶ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed November 15, 2021.

⁶⁷ BP Global, <https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html>, accessed November 15, 2021.

result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁶⁸

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

The Project's design and proximity to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing associated VMT. The design of the Project, which includes dedicated bicycle parking facilities and benches would also encourage non-automotive forms of transportation such as walking or biking to destinations. In addition, extensive public bus and rail transit service is provided within the area of the Project Site and provide regular service intervals of 15 minutes during the peak hours.

As described above, beginning in 2019, the USEPA has developed equations known as the EPA MXD model to calculate trip reductions for multi-use developments. The LADOT VMT calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in the Transportation Assessment (contained in Appendix G-1 of this Initial Study), incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption (see specifically, VMT calculator worksheets contained in Appendix E of the Transportation Assessment).

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

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code, and would implement the following sustainability features:

- Water Conservation:
 - Onsite urban runoff management.
 - Installation of water conserving plumbing fixtures to reduce water usage.
- Energy and Atmosphere:
 - ENERGY STAR rated appliances.

⁶⁸ CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, <https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8>, accessed November 15, 2021.

- Optimized envelope and high-efficient mechanical, electrical, and plumbing systems (MEP).
- Operable overlapping windows, which would enhance cooling and allow air flow.
- Native-Adaptive Landscaping:
 - Native adaptive and drought tolerant landscaping.
 - Invasive species prevention.
- Location and Transportation:
 - Infill location and proximity to transit resources that would reduce VMT.
 - Access to Metro D Line and Metro bus service on Wilshire Boulevard
 - Inclusion of 200 bicycle parking spaces.
 - Sidewalks that are at least 10 feet in width, that would include additional stepbacks along Wilshire Boulevard to allow for pedestrian benches and landscaped areas.

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

8) *Whether the Project conflicts with adopted energy conservation plans.*

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed previously, the 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020-2045 RTP/SCS. The Project would provide residential and commercial uses in close proximity to jobs, services, and other commercial uses, and would be well served by existing public transportation, including Metro bus lines and rail lines. This is evidenced by

the Project Site's location within a designated HQTAs. The 2020-2045 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2020-2045 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As shown in the Transportation Assessment (contained in Appendix G-1 of this Initial Study), incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption. In addition, as in Section XVII (Transportation) of this Initial Study, the Project would result in VMT that does not exceed the Central Area Planning Commission's thresholds of 6.0 for daily household VMT and 7.6 for daily work VMT. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include, but are not limited to, the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency. In addition, the Project would implement sustainability measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2020-2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's mixed-use development, location within a job center, and proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. Further, as described previously, incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption (see specifically, VMT calculator worksheets contained in Appendix E of the Transportation Assessment, which is contained in Appendix G-1 of this Initial Study).

In addition, vehicle trips generated during Project operations would comply with CAFÉ fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

Appendix D-1 Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019.

Appendix D-2 Geotechnical Memo, Geotechnologies, Inc., June 21, 2022.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive.⁶⁹ Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigation prepared for the Project, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.⁷⁰ Additionally, the Project does not propose any types of activities or uses which could cause a rupture in a fault, such as injection wells, hydraulic fracturing, etc. Thus, the Project would not directly or indirectly cause rupture of a fault, and further would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault

⁶⁹ Earthquake Fault Zones, Special Publication 42, California Geological Survey, 2018.

⁷⁰ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 6 (included as Appendix D-1 to this Initial Study).

rupture conditions. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site. Therefore, Project impacts with respect to fault rupture would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in a seismically active Southern California region. According to the Geotechnical Memo contained in Appendix D-2 of this Initial Study, known regional active faults that could produce significant ground shaking at the Project Site include the Hollywood Fault (approximately 2.8 miles north of the Project Site), the Newport-Inglewood Fault System (approximately 2.84 miles west of the Project Site), and the Santa Monica Fault (approximately 3.81 miles to the northwest of the Project Site). Other faults located near the Project Site are the Puente Hills and the Upper Elysian Park blind thrusts. However, the Project does not include the types of activities, such as mining operations, boring of large areas, the extraction or injection of oil or groundwater, horizontal drilling, or other industrial activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking. Given the Project Site's location in a seismically active region, the Site could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code (CBC). The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code (LABC), as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to these requirements would ensure that the Project would be able to withstand strong seismic ground shaking and that it could be safely occupied by Project users.

Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute

to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

As discussed in the Geotechnical Engineering Investigation prepared for the Project Site, the Seismic Hazards Map of the State of California does not classify the Project Site as part of a potentially “Liquefiable” area.⁷¹ It should be noted that the Project’s proposed subterranean levels and foundation elements would extend to a maximum depth of 63 feet below the existing Project Site grade. Based on the dense nature of the underlying Older Alluvial soils and bedrock below, both not prone to liquefaction, the potential for liquefaction at the Project Site is considered to be remote.⁷²

Construction of the Project would not involve the injection of water or any other liquid into the ground. In addition, construction of the Project would be subject to the LABC requirements and recommendations included in the required final geotechnical report. As such, liquefaction potential for the Project Site is considered remote. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including seismic-related liquefaction. Therefore, Project impacts related to liquefaction would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

iv. Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low shear strength, and increased water pressure. The Project Site and adjacent properties are flat and do not contain any slopes or hillside areas.⁷³ The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.⁷⁴ Thus, the Project would not result in any impacts related to landslides. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including landslides, and no impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. Specifically, the Project Site is currently developed with two commercial buildings and surface parking. During the Project’s construction phase, activities such as excavation below ground surface, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. However, the Project would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific

⁷¹ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 6 (included as Appendix D-1 to this Initial Study).

⁷² Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 6 (included as Appendix D-1 to this Initial Study).

⁷³ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 8 (included as Appendix D-1 to this Initial Study).

⁷⁴ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 26, 2021.

SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City (specifically LA Sanitation/Department of Public Works) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project construction activities would be required to comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

Further, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. The Project would comply with the City's Low Impact Development (LID) Ordinance, which requires BMPs that address runoff and pollution at the source. To comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment protocols. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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. The Project would extend approximately 44 feet below the existing grade, and grading will consist of excavations to a maximum of 63 feet in depth for the proposed subterranean parking levels and foundation elements. According to the Geotechnical Engineering Investigation, excavation for the proposed subterranean levels would remove the existing fill materials and would expose the underlying dense San Pedro Formation, composed primarily of dense and very dense silty sands and sands with occasional layers of stiff sandy clays.⁷⁵ The proposed building may be supported on a mat foundation bearing in the dense San Pedro Formation, which would be suitable to bear the weight of the Project. Despite construction of the Project, the San Pedro Formation would not be likely to become unstable due to the very dense soils that make up the San Pedro Formation.

⁷⁵ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 8 (included as Appendix D-1 to this Initial Study).

Construction of the Project would be subject to the compliance with the existing state and local regulations, including the CBC and the LABC and with the recommendations contained in the required final geotechnical report prepared for the Project, including those related to shoring and lateral support, by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, set forth construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk.

As discussed in the Geotechnical Engineering Investigation prepared for the Project, liquefaction-related effects include lateral spreading. For the reasons set forth above and in the Geotechnical Engineering Investigation, the liquefaction potential at the Project Site is considered to be remote. Therefore, the Project would not be susceptible to liquefaction or lateral spreading.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general vicinity. Thus, the potential for subsidence due to withdrawal of fluids or gases to adversely impact the Site is considered low.

As discussed previously, the Project Site and adjacent properties are flat and do not contain any slopes or hillside areas.⁷⁶ The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.⁷⁷ Therefore, the Project would not be susceptible to landslides.

The Project Applicant would be required by the LADBS, as part of the permitting process, to submit a final geotechnical report that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with CBC and LABC building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and related impacts related to such matters would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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 are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Engineering Investigation prepared for the Site, borings were excavated between

⁷⁶ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 2019, page 8 (included as Appendix D-1 to this Initial Study).

⁷⁷ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 26, 2021.

70 and 100 feet in depth below the existing site grade, and the geologic materials encountered within the upper five feet of the Project Site are in the high expansion range.⁷⁸ The Project would extend approximately 44 feet below the existing grade, and grading will consist of maximum excavations up to 63 feet in depth for the proposed subterranean parking levels and foundation elements. Therefore, these potentially expansive soils would be removed during the excavation required to construct the Project's subterranean parking. According to the Geotechnical Engineering Investigation, the native soils to an approximate depth of 40 feet consist of the Lakewood Formation, comprising primarily of sandy to silty clays, with occasional layers of silty sands, while the native soils below a depth of 40 feet consist of the San Pedro Formation, comprising primarily of dense and very dense silty sands and sands with occasional layers of stiff sandy clays.⁷⁹ The Project would be designed and constructed in conformance with current CBC and LABC requirements and the recommendations of the final geotechnical report. Thus, the Project would include foundations appropriate for the type of the soil at the Project Site and therefore would not create a substantial risk to individuals and/or property. Based on the above, development of the Project would not cause or exacerbate geologic hazards and Project impacts with respect to expansive soils would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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 Site is located within a community served by existing sewage infrastructure. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant with Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. The Project would comply with Section 5097.5 of the Public Resources Code, which prohibits the unauthorized removal of paleontological remains.

⁷⁸ [Geotechnical Engineering Investigation](#), Geotechnologies, Inc., April 2019, page 11 (included as Appendix D-1 to this Initial Study).

⁷⁹ [Geotechnical Engineering Investigation](#), Geotechnologies, Inc., April 2019, page 3 (included as Appendix D-1 to this Initial Study).

Regulatory Setting

Federal

Society for Vertebrate Paleontology Standard Guidelines

The Society for Vertebrate Paleontology (SVP) has established standard guidelines⁸⁰ that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. As defined by the SVP⁸¹, significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.

As defined by the SVP,⁸² significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

Based on the significance definitions of the SVP⁸³, all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all

⁸⁰ Society of Vertebrate Paleontology, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed June 5, 2022.

⁸¹ Society of Vertebrate Paleontology, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.

⁸² Society of Vertebrate Paleontology, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources.

⁸³ Society of Vertebrate Paleontology, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources.

geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

State

Public Resources Code Section 5097.5

California PRC Section 5097.5 provides protection for paleontological resources on public lands, where Section 5097.5(a) states, in part, that:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.

Local

City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element recognizes paleontological resources in Section 3: "Archeological and Paleontological" and identifies site protection as important, stating, "Pursuant to CEQA, if a land development project is within a potentially significant paleontological area, the developer is required to contact a bonafide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of paleontological resources. As stated therein, it is the City's objective that paleontological resources be protected for historical, cultural research, and/or educational purposes. Section 3 sets as a policy to continue the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities."

The following discussion is based on the Paleontological Resources Assessment (Paleontological Report) prepared by SWCA Environmental Consultants, included in Appendix D-3 of this Initial Study.

Methodology

The Paleontological Report (included in Appendix D-3) included a review of available scientific literature, geologic maps, and a records search from the Natural History Museum of Los Angeles County (LACM), in order to: (1) determine whether any previously recorded fossil localities occur in the Project area; (2) assess the potential for disturbance of these localities during construction; and (3) evaluate the paleontological sensitivity of the Project area.

Results

Search Results

Geologic Setting

As discussed in the Paleontological Report, the Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long by 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province. The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18–3 million years ago. While sediments dating back to the Cretaceous (66 million years ago) are preserved in the basin, continuous alluvial sedimentation began in the middle Miocene (around 13 million years ago). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments are marine, until sea level dropped in the Pleistocene and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the Project Site occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick. The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across.

The rapid sedimentation into the Los Angeles Basin resulted in the preservation of the organic content of much of the marine sediments, forming the most productive oil-producing district in California. The Project Site is to the immediate southeast of the Salt Lake Oil Field, which is roughly centered along Beverly Boulevard. These oil-producing sediments are relevant to the paleontology of the area, as they are the cause of formations like the world-famous La Brea Tar Pits, located at Hancock Park approximately 0.4 mile west of the Project Site. The asphaltic sands of the La Brea Tar Pits form when petroleum seeps upward into the overlying alluvial sediments. In places where the petroleum reached the surface, sticky pools of asphalt were left behind as the lighter petroleum products evaporated. These pools would then trap most organisms that came into contact with it, everything from pollen and plant seeds to mammoths, analogous to how fly-paper or quicksand works. This mechanism is reflected in the composition of macrofauna discovered at the Tar Pits, which are 90% carnivores. Bones could also be transported and entrapped in the asphaltic sediments through normal fluvial processes. Once entrapped, the asphalt impregnates the bones of animals, contributing to their excellent preservation.

The Tar Pits have a long record of human use, dating back to Native Americans who collected the asphalt for use in roofing. Records of bones being discovered in the La Brea Tar Pits go back to the 1800s; however, these bones were widely regarded as modern domesticated and wild animals that had fallen into the pits, and it was not until 1877 that the first extinct organism, a *Smilodon* (saber-toothed cat), was reported. The first scientific excavations at the Tar Pits began in 1907 and continue today under the direction of LA County's Page Museum at the La Brea Tar Pits. The specimens in the Tar Pits are up to 40,000 years old (late Pleistocene), with over 500 species discovered to date. Species preserved in the asphaltic deposits range from typical Ice Age fauna such as saber-toothed

cat, mammoth, sloth, bison, and dire wolf to a diverse array of microfossils such as rodents, small reptiles and amphibians, insects, pollen and plant remains, and also include some of the oldest human remains in California. At this time, over three million specimens have been collected from the deposits in and around Hancock Park, with excavations continuing today.

The most recent excavations in and around Hancock Park are at Pit 91, which is an ongoing excavation begun in 1913 and continuing today, and Project 23, to the west of Hancock Park at the Los Angeles County Museum of Art (LACMA). Pit 91 was initially excavated from 1913–1915, with excavations resuming in 1969 and continuing to the present. Since the reopening of the pit, 320 species have been recovered from the site. Today, the site is actively excavated during the summer months. During the 2017 field season, 3,300 specimens were recovered, including the skulls of saber-toothed cats and dire wolves, ground sloth bones, and the first confirmed juvenile mammoth from Pit 91. Pit 91 has currently been excavated to a depth of 15 feet, with an estimated 3 to 8 feet of asphaltic deposits remaining further below ground. Another recent excavation of note is Project 23, which resulted from paleontological mitigation work for the LACMA Transformation Project. During construction activities for that project from 2006–2008, fossiliferous asphaltic deposits as well as a non-asphaltic nearly complete mammoth specimen were discovered. In all, 16 fossiliferous asphaltic deposits were crated into 23 wooden boxes, with a total of 383 cubic meters of material collected. The crated deposits are still being processed, with estimates of the number of fossils contained within ranging from one to three million.

Project Geology and Paleontology

The surficial geology (or unconsolidated materials beneath the top layers of soil) of the Project area consists of older alluvium. Sediments mapped as older alluvium consist of slightly indurated and elevated gravel and sand that dates to the Pleistocene (11,700–2.58 million years ago). Pleistocene alluvial sediments have a rich fossil history in the Los Angeles Basin. The most common Pleistocene terrestrial mammal fossils include the bones of mammoth, bison, deer, and small mammals, but other taxa, including horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, have been reported, as well as reptiles such as frogs, salamanders, and snakes. As discussed above, in the vicinity of the Project area these sediments may be impregnated with asphalt, as at the nearby La Brea Tar Pits, in which case they have the potential to preserve unusually dense concentrations of fossil resources. In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction, ecology, and climate change.

Records Search Results

As part of the Paleontological Report, museum records search was requested from the LACM and received on January 30, 2019 (attached to Appendix D-3 of this Initial Study). The results of this search indicate numerous fossil localities are known from older alluvium in the vicinity of the Project area. The closest known locality to the Project area, LACM 1724, is located 0.3 mile west of the Project area, at the intersection of Wilshire Boulevard and Hauser Boulevard. At this locality, fossils of pond turtle (*Clemmys marmorata*), bird (Aves), raccoon (Procyonidae), sabretooth cat (*Smilodon fatalis*), dire wolf (*Canis dirus*), coyote (*Canis latrans*), pronghorn antelope (*Capromeryx minor*), and

bison (*Bison*) were collected from an asphaltic layer at a depth of 8 feet below the surface. Slightly eastward of the Project area, between La Brea Avenue and Tremain Avenue, from south of Wilshire Boulevard to south of Olympic Boulevard, the LACM has three fossil localities (LACM 1198, LACM 1814, and LACM 5599) that produced mastodon (*Mammut*), bovid (*Preptoceras sinclairi*), and camel (*Camelops*) in asphaltic sediments at depths from 2 to 17 feet below the surface. Additionally, the La Brea Tar Pits are located approximately 0.4 mile to the west of the Project area. In addition to the millions of fossils found in the active Tar Pits at Hancock Park, the LACM has records of seven fossil localities within one block of Hancock Park where asphaltic sediments produced significant fossils from the subsurface.

Paleontological Sensitivity

Due to the abundant fossil resources recorded by the LACM in older alluvial sediments, particularly asphaltic sediments, older alluvium is assigned high paleontological sensitivity. As discussed previously, the Project would implement Mitigation Measures 4.5-1(a) through 4.5-1(d) from the City's Housing and Safety Element EIR, provided below. Therefore, in the event that any paleontological resources are discovered during grading, excavation, or other soil-disturbing activities, implementation of MM 4.5-1(a) through 4.5-1(d) would ensure that Project impacts with respect to paleontological resources are less than significant.

Mitigation Measures

MM 4.5-1(a) Paleontological Procedures for Discretionary Projects

For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:

- Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County.
- If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist

shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment.

MM 4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring

If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.

MM 4.5-1(c) Construction Monitoring

If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.

MM 4.5-1(d) Fossil Discovery, Salvage, and Treatment

All discretionary projects shall be subject to the following mitigation measure:

Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).

Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and

not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.

The requirements in this mitigation measure shall be shown on plans.

VIII. GREENHOUSE GAS EMISSIONS

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

Appendix A-2 Greenhouse Gas Emissions Technical Modeling, DKA Planning, August 2023.

Existing Conditions

The Project Site is occupied by approximately 38,545 square feet of retail development with a surface parking lot at the rear of the Project Site. As summarized in Table VIII-1, most emissions would be associated with mobile sources from the 1,766 daily vehicle trips traveling to and from the Project Site on an average weekday.⁸⁴

**Table VIII-1
Annual GHG Emissions Summary (Existing)^a
(metric tons of carbon dioxide equivalent [MTCO₂e])**

Year	MTCO ₂ ^a
Area ^b	0.8
Energy ^c (electricity and natural gas)	131.0
Mobile	1,595.0
Solid Waste ^d	12.6
Water/Wastewater ^e	10.0
Refrigerants	0.04
Total Emissions	1,749
^a CO ₂ e was calculated using CalEEMod model, version 2022.1.1.14. ^b Area source emissions are from landscape equipment and other operational equipment. ^c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. ^d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates. ^e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates. Source: DKA Planning, 2023. Modeling results included in Appendix A.	

⁸⁴ Hirsch/Green Transportation Consulting, "688 Cochran Mixed-Use Project Transportation Assessment Report," May 2022.

Regulatory Background

State: 2022 Climate Change Scoping Plan

The Scoping Plan is a greenhouse gas emission reduction roadmap developed and updated by CARB at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.⁸⁵ The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).⁸⁶ The 2022 Scoping Plan Update, shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

⁸⁵ CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

⁸⁶ CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

**Table VIII-2
Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan**

Emissions Scenario	GHG Emissions (MMTCO _{2e})
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%) ^a
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)
MMTCO _{2e} = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.	
^a 312 – 260 = 52. 52 / 312 = 16.7%	
Source: CARB, Final 2022 Climate Change Scoping Plan, November 2022.	

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor’s Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Table VIII-3 below provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p>Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022)</p> <p><i>The California Climate Crisis Act</i></p>	<p>AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage (CCUS) technologies.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update.</p>
<p>Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022)</p> <p><i>Carbon Capture, Removal, Utilization, and Storage Program</i></p>	<p>SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology.</p> <p>The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project.</p> <p>The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.</p>
<p>Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022)</p> <p><i>Diablo Canyon Powerplant: Extension of Operations</i></p>	<p>SB 846 extends the Diablo Canyon Power Plant’s sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant.</p> <p>The 2022 Scoping Plan Update explains the emissions impact of this legislation.</p>
<p>Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022)</p> <p><i>Clean Energy, Jobs, and Affordability Act of 2022</i></p>	<p>SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability.</p> <p>The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment.</p> <p>The 2022 Scoping Plan Update describes the implications of this legislation on emissions.</p>

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p>Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022)</p> <p><i>Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors</i></p>	<p>SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.</p>
<p>Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022)</p> <p><i>Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases</i></p>	<p>SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses.</p> <p>This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.</p>
<p>Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022)</p> <p><i>California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands</i></p>	<p>AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience.</p> <p>This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO₂, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible.</p> <p>This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.</p>
<p>Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022)</p> <p><i>Hydrofluorocarbon gases: sale or distribution</i></p>	<p>SB 1206 mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.</p>

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
<p>Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021)</p> <p><i>Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects</i></p>	<p>SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding.</p> <p>CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.</p>
<p>Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021)</p> <p><i>Greenhouse Gases: Cement Sector: Net-zero Emissions Strategy</i></p>	<p>SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state’s cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must:</p> <ul style="list-style-type: none"> • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. <p>The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.</p>
<p>Executive Order N-82-20</p>	<p>Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California’s land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state’s carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.</p> <p>CO2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to:</p> <ul style="list-style-type: none"> • Establish a baseline assessment of California’s biodiversity that builds upon existing data and can be updated over time.

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> • Analyze and project the impact of climate change and other stressors in California’s biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. <p>CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state’s process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production.</p> <p>The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.</p>
Executive Order N-79-20	<p>Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are:</p> <ul style="list-style-type: none"> • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. <p>The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above.</p> <p>The 2022 Scoping Plan Update modeling reflects achieving these targets.</p>
Executive Order N-19-19	<p>Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that:</p> <ul style="list-style-type: none"> • Includes a proactive strategy for the state’s pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees’ Retirement System, California State Teachers’ Retirement System, and the University of California Retirement Program. <p>Executive Order N-19-19 directs the State Transportation Agency to leverage more than \$5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions</p>

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<p>associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by:</p> <ul style="list-style-type: none"> • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. <p>The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.</p>
<p>Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019)</p> <p><i>Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program</i></p>	<p>Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.</p>
<p>Assembly Bill 65 (AB 65) (Petrie- Norris, Chapter 347, Statutes of 2019)</p> <p><i>Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans</i></p>	<p>This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.</p>
<p>Executive Order B-55-18</p>	<p>Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:</p> <ul style="list-style-type: none"> • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. <p>This Executive Order also calls for CARB to:</p>

**Table VIII-3
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan**

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. <p>The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.</p>
<p>Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018)</p> <p><i>California Renewables Portfolio Standard Program: emissions of greenhouse gases</i></p>	<p>Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.</p> <p>The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.</p>
<p>Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018)</p> <p><i>Electric Vehicle Charging Infrastructure: Assessment</i></p>	<p>This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure.</p> <p>This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.</p>
<p>Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018)</p> <p><i>Insurance: Climate Change</i></p>	<p>This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.</p>
<p>Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018)</p> <p><i>Near-zero-emission and Zero-emission Vehicles</i></p>	<p>Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds.</p> <p>This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.</p>

The 2022 Scoping Plan Scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in VMT; light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local

governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the Green New Deal and Green Building Code. Each of these is discussed further below.

Regional: 2020-2045 RTP/SCS

The 2020–2045 RTP/SCS seeks to help California reach its GHG reduction goals as set forth under SB 32 for the year 2030. Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020–2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. The 2020–2045 RTP/SCS would result in an estimated 19-percent decrease in per capita passenger vehicle GHG emissions from 2005 to 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2020–2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals.

Local: Green New Deal

The City of LA Green New Deal (formerly Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all City fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a “zero emission first” policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

Local: General Plan Housing Element (Housing Needs Assessment)

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City’s housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City’s housing and growth strategy, and provides the array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City’s population and housing stock to identify housing needs for a variety of household types across the City. The current RHNA goal for affordable housing within the City is approximately forty percent of new construction. However, the City’s projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Local: Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City’s General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁸⁷ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32 and the region’s Sustainable Community Strategy.

Local: City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC also requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions—more than any other sector in the City. These LAMC requirements ensure that new

⁸⁷ Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

Thresholds of Significance

State CEQA Guidelines Appendix G

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to GHGs if it would:

Threshold (a): Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold (b): Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 16064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations

for the reduction of GHG emissions.” Put another way, CEQA Guidelines Section 15063(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

In the absence of any applicable numeric threshold, the significance of the Project’s GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State’s long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the AB 32 *Climate Change Scoping Plan*, and subsequent updates, and the Green New Deal

(1) SCAQMD Thresholds

SCAQMD only has an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Project as the Project is a mixed-use residential and commercial project and the City of Los Angeles is the Lead Agency.

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide does not identify any factors to evaluate GHG emissions impacts. Thus, the potential for the Project to result in impacts from GHG emissions is based on the Appendix G thresholds.

For the reasons set forth above, to answer both of the above Appendix G thresholds, the City will consider whether the Project is consistent with AB 32 and SB 375 (through demonstration of conformance with the 2020-2045 RTP/SCS), and the Green New Deal.

Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emission quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

The City has not adopted a numerical threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. In addition, neither SCAQMD, OPR, CARB, CAPCOA, nor any other state or regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

For information purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Applicable Plans and Policies

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG strategies. As discussed previously, the Project will be evaluated for consistency with AB 32's 2022 *Climate Change Scoping Plan*, SCAG's 2020-2045 RTP/SCS, and the Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform project analyses. Statewide, the Climate Change Scoping Plan provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reduction required by SB 375. The City does not have a programmatic mitigation plan from which to tier from, such as a GHG Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change and this analysis addresses consistency with these strategies and goals. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (AB 32, SB 32, AB 100, AB 1493, and SB 375). A consistency analysis is provided below that describes the Project's consistency with the applicable parts of CARB's *Climate Change Scoping Plan*, SCAG's 2020-2045 RTP/SCS, and the Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes “recommendations intended to build momentum for local government actions that align with the State’s climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA).”

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State’s climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). “By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.”

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing⁸⁸ while demonstrating that a Project is in alignment with the State’s Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State’s climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State’s goals. The State also recognizes the lead agencies’ discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Quantification of Emissions

In view of the above considerations, the City has determined to quantify the Project’s total annual emissions, taking into account the GHG emission reduction measures that would be incorporated into the Project’s design.

This analysis quantifies the Project’s emissions and compares them to a Project without Reduction Features scenario, as defined by CARB’s most updated projections for AB/SB 32. The Project without Reduction Features scenario does not account for energy efficiency measures that would go beyond Title 24 building standards and does not account for trip reductions from

⁸⁸ The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, *2022 Scoping Plan Update, November 2022*

availability of public transportation within 0.25 mile. This comparison is being done for informational purposes only, including to disclose the relative carbon efficiency of the Project. The City, as lead agency, is basing its determination of the significance of the Project's GHG emissions in relation to the Project's location and design and its consistency with State, regional, and local City of Los Angeles regulatory schemes, as explained below.

Project GHG Emissions

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁸⁹ The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute. through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."⁹⁰ Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from a project. The information provided in this section is consistent with the General Reporting Protocol's reporting requirements.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, onsite combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, offsite emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).⁹¹

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities, and are not directly applicable to planning and development situations where buildings do not yet exist.

⁸⁹ California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009.

⁹⁰ California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009.

⁹¹ Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

CARB has recommended consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.⁹² For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁹³ Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing “new” GHG emissions. As a result, there is an inability to conclude whether a project’s GHG emissions represent a net global increase, reduction, or no change in GHG emissions that would exist if the project were not implemented. The analysis of the Project’s GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

The California Emissions Estimator Model® (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁹⁴

Construction

The Project’s construction emissions were calculated using CalEEMod Version 2022.1.1.17. Details of the modeling assumptions and emission factors are provided in Appendix A. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted

⁹² CARB, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.

⁹³ OPR Technical Advisory, p. 5.

⁹⁴ California Air Pollution Control Officers Association, California Emissions Estimator Model, CalEEMod™, www.caleemod.com, accessed May 25, 2016.

based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.⁹⁵ As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operation

Similar to construction, CalEEMod is used to calculate projected potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Projected area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHG emissions emitted.

Projected GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Projected mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new residential,

⁹⁵ SCAQMD Governing Board Agenda Item 31, December 5, 2008.

employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Projected stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

Projected GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

Projected GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of projected Project GHG emissions at buildout uses assumptions in CARB's EMFAC2020 model and also takes into account actions and mandates expected to be in force in 2027 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips as a result of project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. For example, while previous trip generation rates (e.g., Institute of Transportation Engineers) were based on data from suburban, single-use, freestanding sites that may not be representative of urban infill environments, a recent USEPA study found that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and access to bicycle and walking infrastructure. USEPA developed equations known as the EPA MXD model to calculate trip reductions for multi-use developments.⁹⁶ LADOT's VMT Calculator incorporated the MXD model and accounts for project features like increased density and proximity to public transit, which would reduce VMT and fuel use when compared to free-standing sites.

Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2027 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and

⁹⁶ U.S. Environmental Protection Agency, Mixed Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model.

programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

There are no GHG emissions thresholds adopted by the SCAQMD that are applicable to the Project. In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/ residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less than significant impact on climate change. However, this proposed screening threshold was not adopted by the SCAQMD. In the absence of any bright line emissions threshold, the significance of GHG emissions is based on the Project's consistency with plans and programs designed to reduce GHG emissions as described below.

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

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

The analysis provided below addresses both subsection (a) and subsection (b). The discussion of plan consistency (subsection (b)) is provided first, followed by a discussion of the Project's GHG emissions (subsection (a)).

Less Than Significant Impact. The discussion below describes the extent the Project does or does not conflict with various plans including the *2022 Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the Green New Deal. As shown herein, the Project would not conflict with the applicable GHG reduction plans and policies, and, therefore, would not have a significant impact on the environment.

Plan Consistency

Statewide

2022 Climate Change Scoping Plan

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG

Reduction Strategies for Local Government Climate Action Priority Areas)⁹⁷ A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero-emission vehicles (ZEV)**

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs. The Project contributes to this Citywide expansion of the electric vehicle charging infrastructure by including EV parking and infrastructure and conduits for future EV charging stations in accordance with Code requirements.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also

⁹⁷ Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with the LAMC by installing EV chargers in at least 10 percent of total proposed parking spaces which would exceed the CALGreen 2022 requirement.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**
- **Implement parking pricing or transportation demand management pricing strategies**

The City of Los Angeles Mobility Plan 2035, which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

The Project would comply with the City's TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project area. In addition, as discussed under the "Transportation" section of this Initial Study, the Project includes the "Reduce Parking Supply" Project feature from the "TDM Strategies" toolbox of the VMT calculator, based on the provision of parking that is less than required by the LAMC. Therefore, the Project would be consistent and not conflict with this reduction strategy to reduce parking standards.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. The Project would comply with the City's TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project area. Therefore, the Project would not conflict with implementation of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' “Core Vision” prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Please refer below for additional discussion of consistency with the 2020-2045 RTP/SCS.

On a local level, the City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by bus and the future Metro D Line. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage residents and employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

The Project be located in an infill area with substantial transit infrastructure in the vicinity of the Project, including Metro local bus service (i.e., Lines 20, 720, and 786 on Wilshire Boulevard), and LADOT DASH Fairfax shuttle service. The Project would also be close to a future Metro D Line subway station at Wilshire Boulevard and La Brea Avenue. Further, the Project would also promote bicycle transportation by providing 172 long-term bicycle parking spaces and 28 short-term bicycle parking spaces. In addition, the Project would include pre-wiring for electric vehicle charging stations that could support continued penetration of zero-emission vehicles. Finally, the Project Site is also considered a "Walker's Paradise", with a WalkScore of 96 out of 100 points.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households.⁹⁸ This represents more than double the housing planned for during the last eight years.⁹⁹ The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals.¹⁰⁰ CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA's Handbook) provides a VMT reduction measurement for incorporation of low-income housing. Measure T-4 (Integrate Affordable and Below Market Rate Housing) shows a 28.6 percent reduction in VMT for low-income units in comparison to market rate units.

As discussed above, the City's Housing Element of the General Plan provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The current RHNA goal for affordable housing within the City is approximately forty percent of new construction. However, the City's projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent RHNA goal. In order to address this shortfall, the Housing Element identifies measures to encourage development of affordable

⁹⁸ California Department of Housing and Community Development. 2022. Statewide Housing Plan. Available at www.hcd.ca.gov/docs/statewide-housing-plan.pdf.

⁹⁹ Ibid.

¹⁰⁰ Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Available at <https://turnercenter.berkeley.edu/research-and-policy/right-type-right-place/>.

housing such as revising density bonuses for affordable housing; identify locations which are ideal for funding programs to meet low-income housing goals; and rezone areas to encourage low-income housing. The Housing Element estimates that implementation of these measures would increase housing production at all income ranges compared to previous cycles.

The City's 20-percent goal of low-income housing for new construction is applicable on a Citywide basis and not applicable to an individual project. The Planning Department Housing Division found, based on market studies and experiences of other agencies, that mandating 20-percent affordable housing on individual projects is likely to reduce overall housing production, including low income housing, in the City and would be contrary to City and State policies. Pushing more housing outside of the City would be contrary to the Scoping Plan, as infill housing production in the City, which is a highly urbanized city with billions in transit infrastructure, lower average VMT than the SCAG region, is called for in the 2022 Scoping Plan.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes for residential and commercial uses**

California's transition away from fossil fuel-based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project's application for a building permit was submitted, accepted by the Department of Building and Safety, and permit application fees paid prior to the April 1, 2023, deadline included

in LAMC Section 99.05.106.14. Therefore, the Project is exempt from the ordinance. Although the Project is not subject to the ordinance, it would not interfere with its implementation. Therefore, the Project would not conflict with the City’s All-Electric Ordinance.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and Los Angeles Department of Water and Power has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP’s Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project would not involve retrofit of existing buildings. Therefore, the Project would be consistent and not conflict with policies to implement energy efficiency retrofits.

Regional

2020-2045 RTP/SCS

Table VIII-4 provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS and confirms the Project would not conflict with the applicable GHG-related policies in the RTP/SCS.

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis^a
Increase percentage of region’s total household growth occurring within HQTAs.	No Conflict. The Project would include a variety of apartment unit types, and would provide 348 units of housing for a variety of income levels (including 29 units for household qualifying at the Very Low Income level) within an HQTA.
Increase percent of the region’s total employment growth occurring within HQTAs.	No Conflict. The Project represents an infill development that would create approximately 37 jobs, consistent with the 2020 RTP/SCS policies and would focus on growth within an HQTA.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	No Conflict. The Project represents an infill development that would not be built on greenfield or rural land, thereby reducing the demand for sprawl

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
Decrease daily vehicle miles driven per person.	<p>development on greenfield or rural areas on the fringes of Southern California.</p> <p>No Conflict. The Project would construct housing and neighborhood-serving commercial uses near other residential, commercial, office, and entertainment uses, and high employment centers. Therefore, Project residents and employees would be able to walk and bike to work and to shopping. In addition, the Project Site's location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. As shown in the Transportation Assessment (contained in Appendix G-1 of this Initial Study), incorporation of the USEPA MXD Model reduction features application to the Project results in an approximately 31 percent reduction in overall VMT, and would help advance the climate change objectives of both SCAG and the State of California (see specifically, VMT calculator worksheets contained in Appendix E of the Transportation Assessment).</p>
Decrease average daily distance traveled for work and non-work trips (in miles)	<p>No Conflict. The Project represents an infill development that would provide jobs and housing to the Miracle Mile area near transit infrastructure (both rail and bus) that would reduce travel distances per capita. The density of uses in the Miracle Mile area (including a mix of housing, concentration of jobs, entertainment, and other commercial uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location, and would also further contribute to decreases in the distance of average daily trips as a result of the vehicles trips eliminated because of internal capture of residents who use on-site retail, café, and restaurants (addressed as "mixed-use interaction" in the traffic impact analysis).</p>
Increase percentage of work and non-work trips which are less than 3 miles in length.	<p>No Conflict. The Project represents an infill development that would provide jobs and housing to the Miracle Mile area near transit infrastructure (both rail and bus) that would increase the percentage of work and non-work travel less than three miles in length. The density of uses in the Miracle Mile area</p>

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
	(including a mix of housing, jobs, entertainment, and other commercial uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location, and would further contribute to increasing the percentage of trips that are less than 3 miles in length given the density of nearby jobs for Project residents and the density of nearby housing for Project retail and restaurant employees, as well as the Project’s proximity to transit infrastructure.
Increase share of short trip lengths for commute purposes.	No Conflict. The Project is an infill development that would provide jobs and housing to the Miracle Mile area near transit infrastructure (both rail and bus) that would increase the share of short trip lengths for commute trips. The density of uses in the Miracle Mile area (including a mix of housing, jobs, entertainment, and other commercial uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location, and would also further contribute to shorter trips for commute purposes given the density of nearby jobs for Project residents and the density of nearby housing for Project retail and restaurant employees, as well as the Project’s proximity to transit infrastructure.
Increase percentage of trips that use transit (work and all trips)	No Conflict. The Project represents an infill development in the Miracle Mile area with a mix of housing and jobs in the midst of transit infrastructure that would help increase transit mode share. Further, the Project would comply with the City’s TDM Ordinance and would use passive marketing and promotional tools such as information kiosks, posters, website, and/or similar displays containing route maps and schedules for all public transit and other transportation alternatives serving the Project and surrounding area. The Wilshire Boulevard corridor is designated a “Comprehensive Transit Enhanced Street” as part of the City’s Mobility Plan 2035. It is estimated that about 151 persons (net new riders) traveling to the Project Site would use local bus services, while another 105 persons (net new riders) would use the Metro D Line to access the Project Site.

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
Decrease average travel time to work (all modes)	<p>No Conflict. The Project represents an infill development in the Miracle Mile area that will decrease commute travel times by replacing long distance commutes with shorter commutes by virtue of its transit and active transportation mode share given its location along the Wilshire Boulevard corridor. Because the Project’s location will attract travel to and from the Miracle Mile and local community, average travel time to work should be reduced when compared to an urban sprawl location, as the share of long-distance commuters from suburban and exurban locations would be replaced by residents near major transit centers along the Wilshire corridor and Los Angeles area. The density of nearby jobs for Project residents and the density of nearby housing for Project retail and restaurant employees will help reduce the share of long-distance commutes.</p>
Increase percentage of trips using either walking or biking (by trip type)	<p>No Conflict. The Project represents an infill development in the Miracle Mile area that would increase transit and active transportation mode shares given its location along the Wilshire Boulevard corridor. Portions of Wilshire Boulevard are within a Pedestrian Enhanced District that will be a focus for future infrastructure investment to incentivize walking. Other pedestrian-supportive amenities would help increase walking mode share. Wilshire Boulevard is identified in the City’s Mobility Plan 2035’s Bicycle Enhanced Network. It is programmed for future Priority Bicycle Lanes in the area. La Brea Avenue is identified for a future Tier 3 Bicycle Lane, while 6th Street is scheduled for a Tier 1 Protected Bicycle Lane through the study area. Because the Project’s infill location will encourage travel to and from the Wilshire corridor and local community, it will make short-distance commuting by bicycle or walking more viable, as active transportation tends to be more prevalent when shorter commutes are involved. Finally, the Project would provide sidewalks that meet City requirements, with additional stepbacks, between 10 and 21 feet, along Wilshire Boulevard, which</p>

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
	would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas.
Reduce per capita GHG emissions (from 2005 levels)	No Conflict. The Project represents an infill development in the Miracle Mile area that will reduce GHG emissions from a project that is located in a sprawl community, as the infill nature of the Project would shorten commute and general travel distances while promoting public transit and active transportation modes that will slow the rate of growth in auto traffic and congestion by virtue of its location in close proximity to transit. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	<p>No Conflict. The Project represents an infill development in the Miracle Mile area that will increase transit usage based on the Project's close proximity to both bus and rail transit, and its location along the Wilshire Boulevard corridor. Portions of Wilshire Boulevard are within a Pedestrian Enhanced District that will attract future infrastructure investment to incentivize walking. The Project would also provide sidewalks that meet City requirements, with additional stepbacks, between 10 and 21 feet, along Wilshire Boulevard, which would allow for a wider sidewalk and amenities such as pedestrian benches and landscaped areas.</p> <p>The Project would include 200 bicycle parking spaces, and Wilshire Boulevard is identified in the City's Mobility Plan 2035's Bicycle Enhanced Network. It is programmed for future Priority Bicycle Lanes in the area. La Brea Avenue is identified for a future Tier 3 Bicycle Lane, while 6th Street is scheduled for a Tier 1 Protected Bicycle Lane through the study area. Because the Project's location will encourage travel to and from the Wilshire corridor and local community that are expected to support high mode share for public transit and active transportation, single-occupancy vehicle use is expected to be lower than non-infill environments.</p>

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
Objectives from Table 5.1, Connect SoCal Performance Measures & Results, of SCAG's 2020-2045 RTP/SCS.	

Local

Green New Deal

The Green New Deal (formerly the Sustainable City pLAn), a 2019 mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero emission vehicles by 2050.

Although the Green New Deal is not an adopted plan, the Project would generally support and would not preclude these initiatives as the Project is an infill development consisting of residential and retail uses on the Project Site, which is located near regional and local transit services. The Project's location would encourage transit use and the Project would place all of its 348 residential units within 1,500 feet of a transit stop (the future Metro D Line subway station is approximately 625 feet east of the Project Site). Furthermore, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents, employees, and visitors. Therefore, the Project would be consistent with the Green New Deal, and impacts would be less than significant.

Project GHG Emissions

In support of the consistency analysis above that describes the Project's compliance with the regulations and policies outlined in the applicable portions of the plans, policies, and regulations listed above, quantitative calculations are provided below.

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;

- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerants: These are substances used in equipment for air conditioning and refrigeration. Most refrigerants are HFCs or blends of them, which can have high GWP values.

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

Construction

Project construction is anticipated to begin in 2024 and be completed in 2027 with occupancy in 2027. A summary of construction details (e.g., schedule, equipment mix, vehicular trips) and CalEEMod modeling output files are provided in Appendix A of this Initial Study. The GHG emissions associated with construction of the Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table VIII-5.

As presented in Table VIII-5, construction of the Project is estimated to generate a total of 4,808 MTCO₂e. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.¹⁰¹ This results in annual Project construction emissions of 160 MTCO₂e. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions

¹⁰¹ SCAQMD Governing Board Agenda Item 31, December 5, 2008.

estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix A of this Initial Study.

**Table VIII-5
Combined Construction-Related Emissions (MTCO₂e)**

Year	MTCO ₂ e ^a
2024	1,130
2025	1,772
2026	1,377
2027	529
Total	4,808
Amortized Over 30 Years	160
a CO ₂ e was calculated using CalEEMod 2022.1.1.17 and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix A-2 of this Initial Study. Source: DKA Planning, 2023.	

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, consumer products, and other smaller sources of GHG emissions. As shown in Table VIII-6, the Project would result in a total of approximately ten MTCO₂e per year from area sources.

**Table VIII-6
Annual GHG Emissions Summary (Buildout)^a
(metric tons of carbon dioxide equivalent [MTCO₂e])**

Year	MTCO ₂ e ^a
Area ^b	10
Energy ^c (electricity and natural gas)	874
Mobile	6,609
Solid Waste ^d	86
Water/Wastewater ^e	53
Refrigerants	2
Construction	160
Total Emissions	7,795
a CO ₂ e was calculated using CalEEMod 2022.1.1.17 and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix A-2 of this Initial Study. b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted. c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates. e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates. Source: DKA Planning, 2023.	

Electricity and Natural Gas Emissions

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

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

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

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.¹⁰² The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-6, Project GHG emissions from electricity and natural gas usage would result in a total of 874 MTCO₂e per year.

¹⁰² CEC, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

Mobile Source Emissions

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

Mobile source operational GHG emissions were calculated using CalEEMod 2022.1.1.17 and are based on the Project trip-generation estimates. To calculate daily trips, the results of the traffic impact analysis based on the use of the City's VMT Calculator (version 1.4) were used. This tool incorporates the USEPA's MXD model to calculate trip reductions for multi-use developments. This model ensures that factors like resident and job density, availability of transit, accessibility of bicycling and walking paths are considered when estimating the actual trip generation profile of mixed-use projects in urban environments.

As shown in Table VIII-7, the Project's VMT per capita would be 12.2 with a daily VMT of 10,368. The LADOT VMT calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in the Transportation Assessment (contained in Appendix G-1 of this Initial Study), incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption (see specifically, VMT calculator worksheets contained in Appendix E of the Transportation Assessment).

**Table VIII-7
Project Total VMT/Capita**

Factor	Estimate
Total VMT (Project) ^a	10,368 Daily VMT
VMT per Capita ^b	12.2
^a VMT was calculated using the LADOT VMT Calculator. ^b Based on projection of 37 employees and 810 residents Source: DKA Planning, 2023.	

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table VIII-6, the Project GHG emissions from mobile sources would result in a total of 6,609 gross MTCO_{2e} per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod

solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-6, the Project is expected to result in a total of 86 MTCO₂e per year from solid waste that accounts for a 50-percent recycling/diversion rate. This estimate does not factor in additional reductions from SB 1383 that will divert organic waste from the solid waste disposal stream.

Water Usage and Wastewater Generation Emissions

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

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.¹⁰³ GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2016 California Plumbing Code, 2022 CALGreen, 2022 Los Angeles Plumbing Code, and 2022 Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.¹⁰⁴

As shown in Table VIII-6, Project GHG emissions from water/wastewater usage would result in a total of 53 MTCO₂e per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerant Emissions

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in Table VIII-6, the Project is expected to result in a total of two MTCO₂e per year from use of refrigerants that use HFCs and have high GWP values.

¹⁰³ The intensity factor reflects the average pounds of CO₂e per megawatt generated by a utility company.

¹⁰⁴ Base demand reflects water use and wastewater generation without CalGreen building standards that call for 20 percent reductions in consumption.

Construction Emissions

As shown in Table VIII-6, when taking into consideration implementation of project design features, including the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 160 MTCO_{2e} annually (as amortized over 30 years) during construction.

Estimated Reduction of Project GHG Emissions Resulting from Consistency with Plans

As noted earlier, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.¹⁰⁵ This evaluation is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment. However, the Project's emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project. The analysis in this section includes potential emissions under such a "Project Without Reduction Features" scenario and from the Project at build-out based on actions and mandates expected to be in force in 2027.

The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a "Project Without Reduction Features" approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of SB 32.

The Project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, it would eliminate many vehicle trips, because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

As shown in Table VIII-8, the emissions for the Project and its associated CARB 2027 "Project Without Reduction Features" scenario are estimated to be 6,046 and 9,498 MTCO_{2e} per year, respectively, which shows the Project would reduce emissions by 36 percent from CARB's 2027

¹⁰⁵ CEQA Guidelines, Section 14 CCR 15064.4.

“Project Without Reduction Features” scenario when also considering the elimination of the existing emissions.

**Table VIII-8
Estimated Reduction of Project-Related GHG Emissions Resulting from
Consistency with Plans**

Scenario and Source	“Project Without Reduction Features” Scenario*	As Proposed Scenario	Reduction from “Project Without Reduction Features” Scenario	Change from “Project Without Reduction Features” Scenario
Area Sources	10	10	-	0%
Energy Sources	1,507	874	-633	-42%
Mobile Sources**	9,415	6,609	-2,806	-30%
Waste Sources	86	86	-	0%
Water Sources	67	53	-13	-20%
Refrigerants	2	2	-	0%
Construction	160	160	-	0%
Total Emissions	11,247	7,795	-3,452	-32%
Existing Emissions	-1,749	-1,749		
Net Emissions	9,498	6,046	-3,452	-36%
<p>Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.</p> <p>* “Project Without Reduction Features” scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State’s renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%); does not assume 20% reductions from LADWP water standards</p> <p>**Mobile source emissions estimates using LADOT VMT Calculator incorporate USEPA MXD model to calculate trip reductions for multi-use developments. This includes increased density and proximity to transit, which reduces VMT and associated fuel use in comparison to free-standing sites.</p> <p>Source: DKA Planning, 2023.</p>				

It should also be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State’s Cap and Trade program.

Transportation. Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State’s Cap and Trade program.

Energy Use. Both construction and operational activities from the Project Site would generate energy-related emissions that are covered by the State’s renewable portfolio mandates, including SB 100 and SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

Building structures. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.

Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

Post-2030 Analysis

Studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. These targets would build upon those originally established under AB 32 which required reducing statewide GHG emissions to 1990 levels by 2020. As discussed above, SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. The Project's design features advance these goals by reducing VMT, increasing the use of electric vehicles, improving energy efficiency, and reducing water usage.

The emissions modeling in the 2022 Update to the Scoping Plan has projected 2030 statewide emissions, which take into account known commitments (reduction measures) such as SB 375, SB 350, and other measures. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2022 Update to the Scoping Plan assumed a scenario in which cap-and-trade would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2022 Update to the Scoping Plan, additional measures to achieve the 2030 targets and beyond are outside of the City or the Project's control. Executive Order S-3-05 establishes a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal, however, has not been codified. Studies have shown that, in order to meet the 2050 target, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its 2008 Climate Change

Scoping Plan, CARB acknowledged that the “measures needed to meet the 2050 are too far in the future to define in detail.”

CARB has generally described the type of activities required to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately.” Although the Project’s emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State’s achievement of that goal and it is reasonable to expect the Project’s emissions to decline as the regulatory initiatives identified by CARB in the Climate Change Scoping Plan are implemented, and other technological innovations occur. Such regulatory measures, which will further reduce GHG emissions, include the RPS under SB 100, which requires 100 percent renewable energy by 2045. As discussed above, the Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code. Furthermore, the Project would be subject to the 2022 Title 24 standards, which will assist the State in meeting the Zero Net Energy (ZNE) goal and the Executive Order’s horizon-year (2050) goal.

The Project is the type of land use development that is encouraged by the 2020-2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies. As shown above, the reduction in VMT would further support the goal of reducing GHG emissions from passenger vehicles by 2035 in the 2020–2045 RTP/SCS. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets for 2030 and beyond. For the reasons described above, the Project’s post-2030 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

The Governor’s Executive Order B-55-18 (September 2018) establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB will work with relevant state agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring that future scoping plans identify and recommend measures to achieve the carbon neutrality goal. Also discussed above, CARB has released a study evaluating three scenarios that achieve carbon neutrality in California by 2045. The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project would not conflict with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the *2022 Climate Change Scoping Plan and Update*, the 2020–2045 RTP/SCS, and the Green New Deal. Consistency with the above plans, policies, regulations, and GHG emissions reduction actions/strategies would reduce the Project’s incremental contribution of GHG emissions. Therefore, Project-specific and cumulative impacts with regard to climate change would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based on the following:

Appendix E-1 Phase I Environmental Site Assessment, 5401 and 5407 Wilshire Boulevard, Rincon Consultants, Inc., January 17, 2019.

Appendix E-2 Phase II Environmental Site Assessment, 5401-5425 Wilshire Boulevard, Rincon Consultants, Inc., May 29, 2020.

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 types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the routine transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities. In addition, there are regulations establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including but not limited to, the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The Project includes the development of 348 multi-family units, as well as restaurant and retail uses. The types of hazardous materials that would be found on the Project Site during the Project's operational phase would be those typically associated with residential and commercial land uses – paints, cleaning supplies, small amounts of petroleum products, etc. Such use of these materials would be consistent with the use of these materials currently occurring on the Project Site and in other nearby commercial and residential developments. The use of these materials would comply with all applicable federal, state, and local regulations, which may include the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Therefore, the Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment.

Therefore, Project impacts related to this issue would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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 current and past land uses within the Project Site and adjacent to the Project Site were identified as part of the Phase I Environmental Site Assessment (Phase I ESA, included in Appendix E-1 of this IS) to assess their potential to present concerns related to the presence and/or release of hazardous materials. Based on the conclusions of the Phase I ESA and the current and/or historical use of the adjacent properties as gas and oil facilities and dry cleaners, a Phase II ESA was also prepared (and is included in Appendix E-2 of this IS) to determine whether the Project Site has been adversely impacted due to these adjacent land uses. Both the Phase I ESA and Phase II ESA are discussed in more detail below.

Phase I Environmental Site Assessment

Rincon Consultants, Inc. (Rincon) prepared the Phase I ESA for the Project Site in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13, 40 Code of Federal Regulations (F) Part 312.

The Phase I ESA identified the following potential recognized environmental conditions (REC) in connection with the Project Site:

On-site Uses

A. Former onsite dry cleaner (5407 Wilshire Boulevard)

According to the EDR database research report, Tip Top Cleaners & Tailors was present on the western portion of the subject property from 1969 to 1976. No additional information was provided by EDR. This listing is not indicative of a hazardous materials release; however, dry cleaning operations typically involve the use of hydrocarbon-based or chlorinated solvents and are commonly associated with hazardous materials releases. According to a prior 2004 Phase II ESA report prepared for the subject property (Rincon, 2004), which was reviewed as part of the preparation of the Phase I ESA report included in Appendix E-1 of this Initial Study, soil samples collected from 30 feet below ground surface (bgs) from three borings (B1-B3) and 32 feet bgs in B4 were analyzed for volatile organic compounds (VOCs). VOCs were not detected in the four soil samples collected from the western portion of the subject property. In addition, no soil discoloration was noted and no photoionization detector (PID) readings were measured for the soil samples collected (from 5, 20 and 30 feet bgs). Based on the results of the prior Phase II ESA, this former dry cleaner is not considered a REC.

Off-site Uses

B. Current eastern adjacent dry cleaner (682 South Cloverdale Avenue)

According to the EDR database research report, a dry cleaner was present at an eastern adjacent property across South Cloverdale Avenue from the subject property from 1986 to 2014. The historical resources reviewed indicate that 682 South Cloverdale Avenue was occupied by Cloverdale Cleaners from 1951 to 2000. During the site reconnaissance conducted as part of the current Phase I ESA, the dry cleaner was observed to be present at 682 South Cloverdale Avenue. The EDR listings are not indicative of a hazardous materials release; however, because dry cleaners are typically associated with releases of chlorinated or hydrocarbon solvents and based on the proximity to the subject property, the adjacent dry cleaner site has the potential to be adversely impacting soil, soil vapor or groundwater beneath the eastern portion of the subject property. Note that during the 2004 Phase II Assessment conducted at the subject property, soil samples were not collected from the eastern portion of the subject property. Therefore, the current eastern adjacent dry cleaner is considered a potential REC.

C. Former eastern adjacent dry cleaner (676 Cloverdale Court/Avenue) and former garage with gas and oil services from at least 1950 to 1969 (674 South Cloverdale Avenue)

According to the EDR database research report, a “clothes pressers and cleaners” was present at an eastern adjacent property across South Cloverdale Avenue in 1937. The historical resources reviewed indicate that 674 South Cloverdale Avenue was formerly developed with a garage with gas and oil services from at least 1950 to 1969. These former businesses were not listed in databases that are indicative of hazardous material releases; however, because dry cleaners and gas and oil facilities are often associated with releases of chlorinated or hydrocarbon solvents and based on the proximities to the subject property, the former adjacent dry cleaner and former gas and oil site have the potential to be adversely impacting soil, soil vapor or groundwater beneath the subject property. Therefore, the former eastern adjacent dry cleaner and former garage are considered potential RECs.

D. Former western adjacent dry cleaner (5455 Wilshire Boulevard)

According to the EDR database research report, a dry cleaner was present at a western adjacent property across South Cochran Avenue from at least 1987 to 1993. The EDR listing is not indicative of a hazardous materials release; however, because dry cleaners are typically associated with releases of chlorinated or hydrocarbon solvents and based on the proximity to the subject property, the adjacent dry cleaner site has the potential to be adversely impacting soil vapor or groundwater beneath the subject property. Therefore, the former western adjacent dry cleaner is considered a potential REC.

E. Former western adjacent gasoline service station (5453 Wilshire Boulevard)

According to the EDR database research report, a “gasoline and oil service station” was present in 1937. The historical resources reviewed indicate that a “grease” automotive repair building and aviation uses were present on a western adjacent property from at least 1938 to the late 1940s. Although the EDR listing is not indicative of a hazardous materials release, based on the proximity to the subject property, the adjacent former gasoline service station/“grease” automotive repair building has the potential to be adversely impacting soil vapor or groundwater beneath the subject property. Therefore, the former western adjacent gasoline service station is considered a potential REC.

F. The location of the subject property within a methane zone

According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the subject property is located within a methane zone. It is possible that methane is present beneath the subject property due to natural geologic formations. Methane could be located beneath the subject property at levels that could require mitigation. The location of the property within a methane zone is considered a potential REC.

Because the Project Site is located in a methane zone, Rincon recommended a methane survey in accordance with LADBS protocol, prior to any redevelopment of the Project Site.

Based on the current and/or historical use of the adjacent properties as gas and oil facilities and dry cleaners, Rincon also recommended that a soil vapor assessment be conducted at the Project Site to determine whether the Project Site has been adversely impacted due to these adjacent land uses.

Phase II Environmental Site Assessment

Based on the results of the Phase I ESA, five potential RECs were identified in connection with the Project Site and the adjacent uses (which are described above). Therefore, Rincon prepared a Phase II ESA for the Project Site in May of 2020, which is included in Appendix E-2 of this IS. The Phase II ESA included a methane survey in accordance with LADBS protocols, and a soil vapor assessment to determine whether the Project Site was adversely impacted by the adjacent land uses.

On May 8, 2020, under the direct supervision of Rincon, Optimal Technology advanced a total of six shallow borings at the Project Site to a depth of five feet bgs using a hydraulic hand drill. Soil vapor samples were collected at five feet bgs in each of the six boring locations and analyzed for VOCs and total petroleum hydrocarbons as gasoline (TPHg) by EPA Method 8260B, modified for soil vapor by an onsite mobile laboratory. VOCs and TPHg were not detected above the laboratory reporting limits in the six soil vapor samples analyzed for these constituents.

On May 8, 2020, under the direct supervision of Rincon, Optimal Technology advanced a total of

six additional shallow borings (for a total of 12 shallow borings) at the Project Site to a depth of five feet bgs using a hydraulic hand drill. Soil vapor samples were collected at five feet bgs in each of the six boring locations and analyzed for methane by EPA Method 8015 and pressure via an onsite mobile laboratory.

On May 19, 2020, under the direct supervision of Rincon, Choice Drilling advanced a total of three deep borings using a hollow stem auger. Based on the Project's proposed development plans, Choice Drilling attempted to advance the borings to a total depth of 81 feet bgs, and install soil vapor points at 66 feet bgs, 71 feet, and 81 feet bgs, per LADBS guidelines (LADBS Site Testing Standards for Methane).¹⁰⁶ However, during drilling activities, groundwater was encountered between 25 and 30 feet bgs; therefore, soil vapor points were installed at a depth of 23 feet bgs in each of the borings. Per LADBS methane sampling guidelines, soil vapor sampling is not required in the saturated zone and should be conducted at least 12 inches above groundwater.

On May 20, 2020, Optimal Technology collected one soil vapor sample from each of the deep borings, and analyzed the soil vapor samples for methane and pressure by EPA Method 8015. Per LADBS methane guidelines, a second round of analysis was conducted on May 21, 2020, at least 24 hours after the initial round of analysis on May 20, 2020. Methane was not detected above the laboratory reporting limits in the soil vapor samples collected from a depth of 23 feet bgs during either sampling event. In addition, pressure was not detected in any of the borings sampled for methane.

Because VOCs and TPHg were not detected above their respective laboratory reporting limits, the soil vapor at the Project Site does not appear to be impacted by the former adjacent and nearby laundromats/cleaners and gasoline stations/automotive repair facilities. Therefore, no additional assessment pertaining to these issues is recommended, and Project impacts would be less than significant and no further analysis in the EIR is required.

Methane was not detected in any of the samples analyzed. In addition, no pressure was detected in any of the borings. Based on these results, the Project Site does not appear to be impacted by its location within a methane zone. Therefore, no additional assessment pertaining to methane is recommended. However, the Project would be required to comply with the City's methane mitigation regulations related to development in methane zones. Project impacts would be less than significant and no further analysis in the EIR is required.

Asbestos Containing Materials

Based on the age of the existing buildings, it is assumed that they contain asbestos containing materials (ACMs). ACMs, which are carcinogenic and can cause lung disease, are derived from naturally occurring fibrous minerals that have been mined for their useful properties in built

¹⁰⁶ Los Angeles Department of Building and Safety, Site Testing Standards for Methane, https://www.ladbs.org/docs/default-source/publications/information-bulletins/building-code/site-testing-standards-for-methane-ib-p-bc2014-101.pdf?sfvrsn=e898eb53_20.

structures, such as thermal insulation, chemical and thermal stability, and high tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, a potential for exposure when the material becomes damaged to the extent that asbestos fibers become airborne and are inhaled. The principal federal government agencies that regulate asbestos exposure at the Occupational Safety and Health Administration (OSHA) and the US EPA, both of which began regulating asbestos exposure in the early 1970s. Additional regulation and oversight is provided by the SCAQMD.

Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with existing City, State, and federal rules and regulations, including the federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 Code of Federal Regulations 61 Subpart M), the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926.1101) California Occupational Safety and Health Administration (CAL-OSHA) regulations (California Code of Regulations, title 8, Sections 341.15, 1529), and SCAQMD Rule 1403, all materials, which are identified as ACM, would be removed by a trained and licensed asbestos abatement contractor, as required by NESHAP and CAL-OSHA. The removal and disposal of ACMs from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and the Project's impact would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

Lead-Based Paint

Based on the age of the existing buildings, it is assumed that they contain lead-based paint (LBP), which could be released during demolition activities. In order to ensure minimal exposure to sensitive receptors and workers, LBP found in the building is required, by state law, to be removed and disposed of by a qualified Department of Health Services lead consultant in accordance with applicable federal, State, and City regulations, including the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926 *et seq.*), CAL-OSHA regulations (California Code of Regulations, title 8, Sections 1532.1 and 35001 *et seq.*).

The removal and disposal of LBP from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The closest school to the Project Site is the Wilshire Crest Elementary School, which is located approximately one-quarter mile from the Project Site. As discussed above, the Project would use paints, cleaning supplies, and small amounts of petroleum products, which could emit hazardous emissions. However, the use of these materials

would comply with all applicable federal, state, and local regulations. In addition, there are intervening structures and roadways between this school and the Project Site, and the distance between the Project Site and the school would ensure that the Project's use of these materials would not pose a hazard to schools.

Even when the Project operates during school hours, operation of the Project would involve, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. In addition, there are intervening structures and roadways between the closest school and the Project Site. Therefore, the Project would not be expected to emit hazardous emissions within one-quarter mile of an existing or proposal, and this impact would be less than significant. No mitigation measures would be required and no further analysis of this issue in the EIR is required.

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?

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5,¹⁰⁷ and therefore, the construction and operation of the Project would not create a significant hazard to the public or the environment as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport. The closest airports to the Project Site are the Santa Monica Airport and Los Angeles International Airport (LAX), both of which are located over eight miles from the Project Site. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Site. Therefore, no impacts related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁰⁷ Phase I Environmental Site Assessment, Rincon Consultants, Inc., January 17, 2019, page 9 (included as Appendix D-1 of this Initial Study).

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

Less Than Significant Impact. The General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fire, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. In the Project area, Wilshire Boulevard is designated as an emergency/disaster route.¹⁰⁸ While it is expected that the majority of construction activities would be confined to the Project Site, limited off-site construction activities may occur in the right-of-way in adjacent streets during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. During operation, the Project would not require the permanent closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety and access. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could then cause an impediment along City-designated disaster routes, such that the Project would impair implementation of the City's emergency response plan. Project impacts with respect to emergency response and evacuation plans would be less than significant. No further analysis of this topic in the EIR is required.

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 a highly urbanized area of the City that is not subject to wildland fires, and is not located in a Very High Fire Hazard Severity Zone.¹⁰⁹ Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Implementation of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires, and no impacts would occur as a result of the Project. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁰⁸ City of Los Angeles, General Plan Safety Element, Exhibit H, 1996.

¹⁰⁹ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

X. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that 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 Los Angeles Regional Water Quality Control Board (LARWQCB). During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff during a rain event. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, which satisfies the LARWQCB water quality standards, including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. The Project's NPDES/SWPPP compliance would be reviewed and approved by the LARWQCB. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) requiring the Project construction to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that the Project complies with the LARWQCB standards and therefore that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. The Standard Urban Stormwater Mitigation Plan (SUSMP) is a plan that designates BMPs that must be used in specified categories of development projects. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, but the Project's operations would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833), which applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment protocols.

Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site during Project operations as compared with the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade

water quality, and Project impacts related to water quality would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR 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 Project Site is located in an urbanized area of the City and is developed with impervious surfaces (commercial buildings and associated surface parking). During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge under existing conditions. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions. Based on the Geotechnical Engineering Investigation conducted for the Project Site (refer to Appendix D-1 of this IS), the historic high groundwater level at the Project Site is 10 feet.¹¹⁰ The depth of excavation for the Project's three subterranean levels would exceed this depth. Therefore, temporary dewatering may be required during construction. However, the amount of groundwater infiltration likely to occur would be minimal given the small area and depth of the proposed excavation. In addition, all potential dewatering operations would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected. Additionally, all water consumption associated with the Project would be supplied by LADWP and not from groundwater beneath the Project Site. While local groundwater supplies approximately 12% of the water supply for the City, LADWP does not identify any groundwater basins or wells in the Project vicinity.¹¹¹ Therefore, impacts related to groundwater as a result of the Project would be less than significant and no further analysis of this topic in the EIR is required.

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

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the Project 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 area of the City, with a general lack of permeable surfaces on the Project Site and in the immediate

¹¹⁰ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 3, 2019. Refer to Appendix D-1 of this IS.

¹¹¹ LADWP, Groundwater, https://ladwp.com/ladwp/faces/wcnav_externalId/a-w-local-grndwter?_adf.ctrl-state=af6qpousp_17&_afLoop=444926296002924, accessed November 16, 2021.

surrounding area, as most sites are developed with urban uses. There are no natural watercourses on the Project Site. As discussed above, the Project Site is currently developed with existing commercial buildings and paved parking lots and is therefore completely impervious. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would include approximately 7,041 square feet of planted areas. Therefore, the Project Site would be developed with additional permeable surfaces when compared to existing conditions, based on the amount of landscaping that would be provided as part of the Project. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, required BMPs would be implemented to minimize soil erosion impacts during Project during the pendency of such activities. In addition, the Project Applicant would be required by City Ordinance No. 183,833 to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the Project would not alter drainage patterns such that it would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. A significant impact could occur if the Project resulted in increased surface water runoff volumes during construction, or if operation of the Project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site would temporarily alter the existing drainage patterns and reduce off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required by the State Water Resources Control Board (SWRCB) to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site during Project operations as compared to the current conditions. Impacts would therefore be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A significant impact could occur if the Project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if the Project would introduce substantial new sources of polluted runoff.

Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the vicinity of the Project Site.

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Pursuant to City regulation, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase in impervious surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the Project would be required to comply with the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, as a result of a reduction in impervious surfaces and compliance with regulations which reduce stormwater flows during rainfall events, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality during Project operations would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. Thus, the Project would not have the potential to impede or redirect flood flows and no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly

referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1605F).¹¹² Further, as the Project Site is located approximately nine miles east of the Pacific Ocean, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.¹¹³ Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and grading, excavation, and other construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. However, compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that impacts with respect to a water quality control plan are less than significant.

While local groundwater supplies approximately 12% of the water supply for the City, LADWP does not identify any groundwater basins or wells in the Project vicinity.¹¹⁴ Therefore, the Project would not conflict with or obstruct implementation of a groundwater management plan. Further, the historic high groundwater level at the Project Site is 10 feet.¹¹⁵ The depth of excavation for the Project's three subterranean levels would exceed this depth. Therefore, temporary dewatering may be required during construction. However, the amount of groundwater infiltration likely to occur would be minimal given the small area and depth of the proposed excavation. In addition, all potential dewatering operations would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected. Therefore, the Project would not conflict with or obstruct

¹¹² FEMA Flood Map Service Center, Search by Address, website: <https://msc.fema.gov/portal/search>, accessed November 16, 2021.

¹¹³ City of Los Angeles, General Plan Safety Element, Exhibit G, 1996.

¹¹⁴ LADWP, Groundwater, https://ladwp.com/ladwp/faces/wcnav_externalId/a-w-local-grndwter?_adf.ctrl-state=af6qpousp_17&_afLoop=444926296002924, accessed November 16, 2021.

¹¹⁵ Geotechnical Engineering Investigation, Geotechnologies, Inc., April 3, 2019. Refer to Appendix D-1 of this IS.

implementation of a groundwater management plan, and this impact would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

XI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized area of the City currently developed with commercial buildings. Additionally, the Project Site is entirely surrounded by existing development and roadways. The Project would provide a mix of residential and retail/restaurant uses, which would be consistent with other land uses in the surrounding area and compatible with the surrounding community. As such, the Project would be compatible with and complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project's consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect is discussed below. As provided in the below discussion, the Project would not conflict with any such plans, policies, or regulations, and impacts would be less than significant. Therefore, no mitigation measures would be required and further analysis of this topic in the EIR is not required.

Regional

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population

exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

SCAG 2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their regional transportation plans and sustainable communities strategies periodically, and SCAG has created a 2020-2045 updated RTP/SCS called Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy). On May 7, 2020, SCAG's Regional Council adopted Connect SoCal for federal transportation conformity purposes only. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emissions reduction target.

The 2020-2045 RTP/SCS 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 whose collaboration can improve the quality of life for Southern Californians. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2020-2045 RTP/SCS is provided in Tables F-1 and F-2 of Appendix F to this IS. As shown therein, the Project would not conflict with the applicable goals and policies. The Project would construct housing and neighborhood-serving commercial uses on an infill site, within a HQTA, near the under construction Metro D Line (Purple Line) Wilshire/La Brea station and sources of shopping and employment. The Project would increase housing supply, diversity, and affordability in the Project area. Of the Project's 348 proposed dwelling units, 29 units would be income-restricted affordable for Very Low Income households. Given the urban nature of the Project Site area, Project residents and employees would be able to walk and bike to work and to shop. In addition, the Project Site's location near transit (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking. The Project would also provide sidewalks on Wilshire Boulevard that include additional stepbacks, between 10 and 21 feet, which

would allow for a wider sidewalk and amenities such as benches and landscaped areas where pedestrians could rest. Finally, the Project would include approximately 172 long-term bicycle parking stalls and 28 short-term bicycle parking stalls, which would encourage bicycling as a form of exercise and transportation. This type of transit-oriented mixed-use project helps achieve CARB's GHG emission reduction targets as it would reduce both dependence on automobile travel and mobile-source GHG emissions. Thus, the Project would not conflict with applicable policies of the 2020-2045 RTP/SCS, adopted for the purpose of reducing an environmental effect.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 citywide elements.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address land use and serves as a guide for updating the community plans and the citywide elements. The Framework Element provides a base relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans incorporated elsewhere in the City's planning and regulatory process. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, while the community plans determine the specific land use designations of individual parcels.

Project Consistency Discussion

The Project's consistency with the General Plan Framework Element land use policies is provided in Table F-3 in Appendix F of this IS. As shown therein, the Project would not conflict with the applicable policies, such as those to integrate housing and commercial uses and to emphasize pedestrian and bicycle access. The Project would redevelop a property that is currently improved with two commercial buildings and surface parking with new mixed-income housing and ground floor commercial uses. The Project would integrate housing and commercial uses, and would provide such uses according to the existing zoning and land use designations for the Project Site, and would develop 348 multi-family residential units and approximately 12,821 square feet of retail/restaurant uses. The Project would also activate the pedestrian environment by providing sidewalks on Wilshire Boulevard that include additional stepbacks, between 10 and 21 feet, which would allow for a wider sidewalk and amenities such as benches and landscaped areas where pedestrians could rest. The provision of ground floor commercial spaces, including outdoor dining spaces, would further improve the pedestrian environment of the neighborhood. Finally, the

Project would include a total of 200 bicycle parking spaces, which would encourage bicycling as a form of transportation. Therefore, the Project would be consistent with applicable policies of the General Plan Framework Element, adopted for the purpose of reducing an environmental effect.

Other General Plan Elements

For the purpose of determining impacts to individual topics, refer to the sections where impact determinations for those topics are discussed. Any impacts would be discussed in those sections.

City of Los Angeles General Plan Air Quality Element

See Checklist Question III(a) (Air Quality) for a discussion of the Project's consistency with the Air Quality Element of the City of Los Angeles General Plan. As discussed therein, the Project would not conflict with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation.

City of Los Angeles Mobility Plan 2035

See Checklist Question XVII(a) (Transportation) and the Transportation Assessment (contained in Appendix G of this Initial Study) for a discussion of the Project's consistency with the Mobility Plan 2035. As discussed therein, the Project would not conflict with the policies of the Mobility Plan 2035.

City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

As discussed above in response to Checklist Question V(a) (Cultural Resources), the Project Site is located within the boundaries of the Miracle Mile Historic District, which is listed in the California Register of Historical Resources. While neither of the existing buildings (at 5401 and 5407 Wilshire Boulevard) were identified by SurveyLA as eligible for individual designation on a historic register, the building at 5401 Wilshire Boulevard is a contributing building to the Historic District. The Project involves the demolition of the building at 5401 Wilshire Boulevard, with two of its façades retained and incorporated into the new building at 5401 Wilshire Boulevard. Therefore, Project impacts with respect to historic resources could be potentially significant and will be analyzed further in the EIR and any impacts with respect to historic resources will be analyzed in

the Cultural Resources section of the EIR. Any impact resulting from a conflict with a land use plan, such as the Conservation Element, that would result in an impact to the environment related to historic resources will also be discussed in detail in the Cultural Resources section of the EIR. Nevertheless, even if the Project is determined to conflict with a portion of the Conservation Element based on the demolition of the building at 5401 Wilshire Boulevard, the Project is not required to be consistent with every plan and policy. More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, State law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan. On balance, the Project would be more consistent with the applicable plans and policies than it is inconsistent.

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan area of the City of Los Angeles. The Wilshire Community Plan is one of 35 Community Plans that make up the Land Use Element of the City’s General Plan. Under the Community Plan, the Project Site has a General Plan land use designation of Regional Center Commercial. The Community Plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard, and Pico Boulevard to the south; Hoover Street to the east; and the cities of West Hollywood and Beverly Hills to the west.¹¹⁶

The Community Plan is “intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; coordinate development of the community; and guide development by informing the general public of the City’s planning goals, policies, and development standards with the objective of creating a healthy and pleasant environment.”¹¹⁷

Project Consistency Discussion

The Project’s consistency with the residential and commercial objectives and policies of the Wilshire Community Plan is provided in Table F-4 in Appendix F of this IS. As shown therein, the Project would not conflict with the applicable objectives and policies, such as those for the provision of multi-family housing to meet the diverse economic needs of both existing and new residents, and to encourage higher density residential uses near major public transportation centers. The Project’s 348 residential units would provide a supply of multi-family housing to meet the diverse economic needs of residents in the Community Plan Area, consistent with Community Plan Objective 1-1 and Policy 1-1.3. Of the 348 units, 29 units would be income-restricted

¹¹⁶ Wilshire Community Plan, City of Los Angeles, 2001, page I-1.

¹¹⁷ Wilshire Community Plan, City of Los Angeles, 2001, page II-2.

affordable for Very Low Income households. Residents of the Project would also have access to several public transit options, including Metro Rapid Bus Line 720 and the future Metro Rail D Line, currently under construction. As such, the Project would not conflict with applicable policies of the Wilshire Community Plan, which are adopted for the purpose of reducing an environmental effect.

City of Los Angeles General Provisions and Zoning Code

Use

The Project is located within the [Q]C4-2-CDO and [Q]C2-1-CDO zones, which allows for multi-family residential, commercial and parking uses. Ordinance No. 176,332 (effective January 16, 2005) established [Q] Conditions in the Miracle Mile. The [Q]C2-1-CDO portion of the Project Site corresponds to Subarea H of Ordinance No. 176,332, which establishes a [Q] condition for the parcels which states that the use of the property shall be limited to parking lots or residential development up to R4 densities. The [Q]C4-2-CDO portion of the Project Site allows for multi-family residential, commercial, and parking uses. Thus, the Project would be consistent with the uses permitted by the [Q] Condition.

Floor Area

The Project Site is located within a commercial zone, with portions in both Height District 1 and Height District 2. Height District 1 allows a Floor Area Ratio (FAR) of 1.5 to 1 and Height District 2 allows an FAR of 6 to 1, or 1.5 and six times the buildable area of the Project Site, respectively. Pursuant to LAMC Section 12.03, the buildable area has the same meaning as the lot area in commercial zones for purposes of calculating requirements for floor area of residential and commercial uses.

The 11,318 square feet of lot area in Height District 1 yields a total permitted floor area of 16,977 square feet. The 46,056 square feet in Height District 2 yields a total permitted floor area of 276,336 square feet. Combining the respective floor area limits permitted in the two height districts across the Project Site would be 293,313 square feet, which equates to an FAR of 5.11 to 1. By virtue of the provision of affordable housing, the Applicant is seeking an on-menu Density Bonus incentive to average floor area across contiguous parcels in the [Q]C4-2-CDO and [Q]C2-1-CDO zones. In addition, the Applicant is seeking an off-menu Density Bonus incentive pursuant to LAMC Section 12.22.A.25(g)(3) to provide a total floor area of 476,777 square feet, which equates to an FAR of 8.31 to 1. The Project is eligible for these State Density Bonus Law incentives per California Government Code Section 65915 to deviate from this standard to address the Project's affordable housing costs, and this request does not conflict with the Project Site's existing zoning.

Miracle Mile Design Overlay

The Miracle Mile Community Design Overlay (CDO) applies to commercially zoned areas along Wilshire Boulevard between Fairfax Avenue to the west and Sycamore Avenue to the east. The

Miracle Mile CDO Design Guidelines & Standards document (CDO Guidelines) sets forth guidelines for public and private development projects in the CDO area. The intent of the CDO is to provide guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity, and promote the pedestrian environment of the District. The Project would not conflict with the stated intention of CDO Guidelines.

The Project would comply with the requirements of the CDO, and would not conflict with the implementation and goals of the District. The Project includes Streamline Moderne elements which comply with the materials, pedestrian orientation, and other requirements of the District.

The ground level design promotes pedestrian activity through street-facing commercial uses. The commercial uses are designed with a unified storefront glazing system and high interior ceilings to sustain street level interest, to promote pedestrian traffic, and to increase eyes-on-the- street. The Project would also provide several pedestrian entrances along all street frontages, including Art Deco-inspired awnings.

The public right-of-way would be improved with pedestrian amenities and safety features. The proposed sidewalk improvements include additional building setbacks along Wilshire Boulevard, between 10 and 21 feet, to allow for a wider sidewalk with pedestrian benches and landscaped areas. Specialty pavers, influenced by the terrazzo flooring of the Art Deco period, would also be provided within the additional setbacks (on private property).

Overall, the Project would not conflict with the intent CDO Guidelines to improve the appearance, enhance the identity, and promote the pedestrian environment of the District.

Conclusion

As described above, the Project is consistent with the General Plan land use designation and zoning for the Project Site. The Project is not required to be consistent with every plan and policy. As provided in the analysis above, the Project would be far more consistent with the applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect than it is inconsistent. In addition, the Project furthers the vast majority of the policies contained in the applicable plans. Therefore, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

XII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. There are no known mineral resources on the Project Site or in the vicinity.¹¹⁸ The Project Site is currently zoned [Q]C4-2-CDO and [Q]C2-1-CDO and has a land use designation of Regional Center Commercial, and is currently developed with two commercial buildings totaling approximately 38,545 square feet and associated surface parking. Thus, the Project Site is not zoned for oil extraction and drilling, or mining of mineral resources, and there are no such activities occurring at the Project Site. The Project Site is not located within a mineral producing area as classified by the California Geological Survey.¹¹⁹ Further, the Project Site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.¹²⁰ Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact related to mineral resources would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan

¹¹⁸ City of Los Angeles General Plan, Conservation Element, Exhibit A.

¹¹⁹ California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Aggregate Reserves, 2018.

¹²⁰ City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, <http://planning.lacity.org/cwd/gn/pln/consvelt.pdf>

Conservation Element or any other applicable land use plan.¹²¹ Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹²¹ City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>

XIII. NOISE

	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

Potentially Significant Impact. The Project Site is located in an urbanized area that contains various sources of noise. The most predominant source of noise in the vicinity of the Project Site is associated with traffic from roadways. During Project construction, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate a temporary increase in ambient noise levels. In addition, because the Project would introduce new residential and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Further, traffic attributable to the Project has the potential to increase noise levels along roadways in the Project area. Therefore, Project impacts with respect to noise would be potentially significant and will be analyzed further in the EIR.

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

Potentially Significant Impact. During Project construction, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.), as well as construction truck travel, could generate groundborne vibration and noise. Therefore, Project impacts with respect to groundborne vibration and noise during construction would be potentially significant and will be analyzed further in the EIR.

The proposed residential and commercial uses are not the type of uses that would be expected to generate groundborne vibration and noise. Nevertheless, the EIR will also include a discussion of Project impacts with respect to groundborne vibration and noise during operation.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport.¹²² The closest airports to the Project Site are LAX and the Santa Monica Airport, both of which are over eight miles from the Project Site. Therefore, the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels within two miles of a public airport or public use airport, and no impact would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹²² City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, October 19, 2021.

XIV. 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 roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. A significant impact could occur if a project induces substantial unplanned growth in an area, either directly or indirectly.

Environmental Setting

The Project Site is located within SCAG’s jurisdiction. SCAG’s mandated responsibilities include the preparation of plans and policies with respect to the region’s population growth, transportation programs, air quality, housing, and economic development. The 2020–2045 RTP/SCS, reflecting SCAG’s most current projections, includes the following growth forecast for population, households, and employment for the City:¹²³

- Population: 4,771,300 persons in 2045;
- Households: 1,793,000 households in 2045; and
- Employment: 2,135,900 jobs in 2045.

The majority of future California population and household growth is projected to and intended by various levels of government to be focused in metropolitan areas, and most of that will occur in southern California. According to SCAG’s 2020-2045 RTP/SCS, the City of Los Angeles is

¹²³ SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24: http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf.

projected to add approximately 721,983 people and approximately 367,241 households between 2020 and 2045.

Table XIV-1 lists SCAG's forecasts for population, housing, and employment for the City, as contained in the 2020-2045 RTP/SCS.¹²⁴

Existing Uses

The Project Site is located in the highly urbanized Miracle Mile area of the City of Los Angeles and is currently developed with two commercial buildings and associated surface parking.

**Table XIV-1
SCAG RTP/SCS Population, Housing, and Employment Forecasts for the City¹**

Year	Population	Households	Employment
2020	4,049,317	1,425,759	1,887,969
2027	4,251,472	1,528,586	1,957,390
2045	4,771,300	1,793,000	2,135,900

¹ Population, housing, and employment data for 2045 is from SCAG's 2020-2045 RTP/SCS, Demographics and Growth Forecast, Table 14. Population, housing, and employment rate data for 2020 and 2027 (anticipated buildout year of the Project) were calculated based on a linear interpolation of the 2020 to 2045 projections.

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only as long as their specific skills are needed to complete a particular phase of the construction process. Accordingly, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the development of up to 348 new residential multi-family dwelling units, and approximately 12,821 square feet of retail and restaurant uses. As discussed in the Transportation Assessment prepared for the Project (based on LADOT's VMT calculator), the Project would add a residential population of approximately 810 people to the Project Site and the Project's commercial uses would generate approximately 37 employees.

¹²⁴ Employment information is provided for informational purposes only.

Population: As shown in Table XIV-2, below, compared to the anticipated population growth in the City of Los Angeles between the 2020 baseline year and the Project's anticipated buildout year of 2027, the Project's residential population would represent approximately 0.40 percent of the total forecasted City of Los Angeles population growth during that period.¹²⁵ The Project's residential population would represent approximately 0.11 percent of the forecasted population growth between 2020 and 2045.¹²⁶

Housing: As shown on Table XIV-2, compared to the anticipated housing growth in the City of Los Angeles between the 2020 baseline year and the Project's anticipated buildout year of 2027, the Project's housing units would represent approximately 0.34 percent of the forecasted City housing growth.¹²⁷ The Project's housing units would represent approximately 0.09 percent of forecasted growth between 2020 and 2045 in the City of Los Angeles.¹²⁸

Employment: As shown on Table XIV-2, compared to the anticipated employment growth in the City of Los Angeles between the 2020 baseline year and the Project's anticipated buildout year of 2027, the Project's employment would represent approximately 0.05 percent of the forecasted City of Los Angeles employment growth.¹²⁹ The Project's employment would represent approximately 0.01 percent of forecasted growth between 2020 and 2045 in the City of Los Angeles.¹³⁰

¹²⁵ $810/202,155 \times 100\% = 0.40\%$.

¹²⁶ $810/721,983 \times 100\% = 0.11\%$.

¹²⁷ $348/102,827 \times 100\% = 0.34\%$.

¹²⁸ $348/367,241 \times 100\% = 0.09\%$.

¹²⁹ $37/69,421 \times 100\% = 0.05\%$.

¹³⁰ $37/247,931 \times 100\% = 0.01\%$.

**Table XIV-2
Project Growth Comparison to Growth Forecasts**

Project Population, Housing, and Employment Growth	Forecast Citywide Growth¹	Project % of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2020 to 2027 (Interpolated)		
810 residents	+202,155	0.40
348 units	+102,827	0.34
37 employees	+69,421	0.05
As compared to SCAG Growth Forecast from 2020 to 2045		
810 residents	+721,983	0.11
348 units	+367,241	0.09
37 employees	+247,931	0.01
¹ Refer to Table XIV-1.		

The Project Site is currently served by an existing roadway network and utility and public services infrastructure. Any utility connections for the Project (such as for wastewater, water, electricity, and natural gas) would be pursuant to requirements to serve only the Project itself, and would not expand any infrastructure in a way that could lead to unplanned growth. Further, the Project includes a three-foot dedication on Cochran Avenue to meet the Mobility Plan 2035 design specifications. However, this dedication does not include any roadway widening that could lead to unplanned growth, and instead would be used for additional sidewalk and parkway area. The Project does not include the development of any new or extended roadways or other infrastructure that would be growth-inducing.

In addition to the Project being within the quantitative growth forecast for the City as a whole, as demonstrated in the analysis above, the Project would also be in a location where new growth is planned and encouraged. Specifically, according to the 2020-2045 RTP/SCS, the Project Site is located within a HQTGA PGA, and would provide 348 housing units near transit (bus lines and the future Metro D Line) and is therefore consistent with the location and land use pattern for new growth encouraged by the RTP/SCS. As the Project's estimated population, housing, and employment generation would be within SCAG planned growth forecasts for the City of Los Angeles, and as the Project does not include the extension of roadways or other infrastructure, the Project would not indirectly or directly induce substantial unplanned population growth. Therefore, Project impacts related to unplanned population growth would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

No Impact. No housing currently exists on the Project Site, and no people live on the Project Site. As noted above, the Project Site is currently developed with two commercial buildings and associated surface parking. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impact related to this issue would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based in part on the following:

Appendix I-1 LAFD Response, Los Angeles Fire Department, February 10, 2023

Appendix I-2 LAPD Response, Los Angeles Police Department, September 13, 2022.

a. Fire protection?

Less Than Significant Impact. A significant impact would occur if a new or physically altered fire station would be necessary, the construction of which could cause significant environmental impacts as a result of the Project. The Project Site is located in an urbanized area of the City that is currently served by existing LAFD services. Fire stations that would serve the Project Site are shown on Table XV-1, below.

**Table XV-1
Fire Stations Serving the Project Site**

No.	Address	Distance from Project Site (miles)	Services and Equipment	Staff
61	5821 West 3 rd Street	0.5 miles	Light Force, Assessment Engine, Paramedic Rescue Ambulance, BLS Rescue Ambulance, EMS Supervisor	14
68	5023 West Washington Blvd.	1.8 miles	Engine, Paramedic Rescue Ambulance, Battalion Supervisor	8
29	4029 West Wilshire Blvd.	2.2 miles	Task Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance	14
41	1439 North Gardner	2.9 miles	Engine and Paramedic Rescue Ambulance	6
58	1556 South Robertson Blvd.	3.0 miles	Assessment Engine, Paramedic Rescue Ambulance, BLS Rescue Ambulance	8

Source: LAFD, correspondence contained in Appendix I-1.

The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.¹³¹ The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the LAFD South Bureau area and therefore the City cannot identify with specificity at this time the location or size of such facilities. Therefore, to the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: 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) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection. Construction activities may also 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.

¹³¹ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

Project construction activities would be required to comply with all applicable federal, State, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and 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.¹³² Project demolition and construction activities 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. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections) and travel lanes would be maintained in each direction on all public streets around the Project Site throughout the construction period, and emergency access would not be impeded. Further, the Project would be required to implement a Construction Traffic Management Plan, which would include traffic management strategies, and ensure that adequate and safe access for LAFD remains available within and near the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access and response times. However, a Construction Traffic Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. The majority of construction-related traffic, including deliveries, hauling activities, and construction worker trips, would occur outside the typical weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times. In addition, temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period, and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections).

Furthermore, Section 21055 of the California Vehicle Code (CVC) exempts drivers of authorized emergency vehicles from adherence to the rules of the road, and Section 21806 of the CVC

¹³² <https://www.dir.ca.gov/title8/1920.html>

requires drivers to yield to emergency vehicles. Finally, construction is a temporary condition which would not itself require the construction of specific new governmental facilities to maintain adequate fire protection services.

The Project is similar to other construction projects, including those currently under construction, recently completed, or extant within the South Bureau area, and uses standard materials and construction practices similar to such projects. As a result, LAFD possesses sufficient equipment, knowledge, and resources to addresses any concerns related to fire protection from construction of the Project. Furthermore, as discussed above, the Project would comply with relevant regulations for workplace safety, best management practices for material use and storage, and ensuring emergency access to the site.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

Operation

The generation of residents, employees, and visitors to the Project Site would potentially increase the demand for LAFD services at the Project Site.

As discussed in Section 3, Project Description, the Project proposes 348 residential units and approximately 12,821 square feet of commercial space. Based on the uses currently occurring at the Project Site, the Project Site currently generates a low demand for LAFD fire protection services. Once completed, the Project would increase the building area and both the daytime and nighttime population of the Project Site compared to existing conditions. As such, the Project would increase the demand for LAFD fire protection services within LAFD's South Bureau.

The Project-related operational uses at the Project Site would be expected to generate a range of fire service calls similar to other such uses, including kitchen/house fires, garbage bin fires, car fires, and electrical fires. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that utilize or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest to the Project Site.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code

requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.

According to the LAFD (see correspondence contained in Appendix I-1 of this Initial Study), fire flow requirements vary from 2,000 gallons per minute in low-density residential areas to 12,000 gallons per minute in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch is to remain in the water system, with the required gallons per minute flowing. The required fire flow for the Project has been set at 12,000 gallons per minute.

With respect to response distance, based on a required fire flow of 12,000 gallons per minute, an Engine Company should be within $\frac{3}{4}$ -mile and a Truck Company should be within one mile. According to the LAFD (see correspondence in Appendix I-1), based on the response distance from existing fire stations to the Project Site, fire protection would be considered adequate.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways and would be maintained at all times during both Project construction and operation. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Department of Building and Safety and LAFD standards and requirements for design and construction.

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Objective 9-1 of the Central City Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Further, LAFD has identified future strategies in their 2018-2020 Strategic Plan as critical goals to continue to provide excellent service and meet future needs. These strategies consist of better integration of technology in dispatch, vehicle location systems, and staffing as a key component of LAFD's strategy. LAFD is adapting more advanced technological strategies to deploy resources and address life safety issues, maximizing existing resources. LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements outlined

which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project operation would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.¹³³ The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.¹³⁴ The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Wilshire Community Police Station area and therefore the City cannot identify with specificity at this time the location or size of such facilities. Therefore to the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: 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) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction and operation of new buildings can result in additional calls for service from the Los Angeles Police Department (LAPD). The Project includes proposed construction methods and building uses currently widespread in the City of Los Angeles, which LAPD has sufficient

¹³³ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

¹³⁴ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

specialized equipment and training with which to respond. LAPD dispatches resources dynamically, with officers responding from the field, patrols, or facilities depending on their location at the time. Due to the nature of dispatching police calls for service, facilities are not the limiting factor in responding to calls for service, but rather equipment and staffing as police are infrequently in one location for extended periods of time. LAPD continually evaluates their equipment and staff levels, making adjustments as necessary, with a focus towards advanced technology, operational efficiencies, community involvement, and advanced training to maximize current resources community involvement, as outlined in the LAPD Strategic Plan, *LAPD 2020 & Beyond*.¹³⁵ Due to the unpredictable nature of deploying resources, developments such as advanced equipment in vehicles, improved access to digital resources in vehicles, and advanced mobile phone capabilities all allow for a more mobile and dynamically deployed workforce. These advances, such as in car computers, mobile phone advancements, mapping and navigation improvements, and dispatch center advancements allow for resources to be deployed from the field rather than a static office or station. The Project would not introduce physical obstructions, inhibiting the LAPD, nor would the uses contain novel activities that would require new police facilities to adequately ensure public safety. The Project would also comply with relevant laws, as well as industry standards in securing the property during both construction and operation. The Project would include security measures during operation, such as secured access, closed circuit video surveillance, security alarm systems, and ample lighting. The Project would not constitute a novel arrangement of uses or use type which would require the construction of altered or new specialized facilities.

The Project Site is located within the LAPD's West Bureau, which oversees LAPD operations at the Hollywood, Olympic, Pacific, West LA, Wilshire, and West Traffic stations. The Wilshire Community Police Station, located at 4861 West Venice Boulevard, serves the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Pak, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile (including the Project Site), Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square. LAPD has identified the need for more reserve officers in its Strategic Plan, and identifies staffing needs yearly during the budgeting process. The Wilshire area is has approximately 237 sworn personnel and 10 civilian support staff.¹³⁶ New staffing is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project Site is located within the densely developed Miracle Mile area, with similar residential and commercial uses as the Project, and a dedicated officer population. The Project would therefore not introduce population to an area not served by a police station or an area otherwise not currently served by existing police

¹³⁵ <http://lapd-assets.lapdonline.org/assets/pdf/Strategic%20Plan%202019-2021.pdf>

¹³⁶ Los Angeles Police Department, correspondence dated September 13, 2022, included in Appendix I of this Initial Study.

services, and therefore the Project would not require new facilities or staffing requiring dedicated facilities.

Furthermore, the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAPD emergency response. Finally, according to the LAPD (see correspondence contained in Appendix I of this Initial Study), “there are no special police protection requirements needed by law enforcement because of the specific attributes of this Project Site” and “the Mirabel Transit Priority Project, individually or combined with other past, present, or future projects, will not result in the need for new or altered police facilities.”

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection and Project impacts with respect to police protection would be less than significant without mitigation. In addition, the Project would implement Mitigation Measures 4.12-2(a) and 4.12-2(b) from the City’s Housing and Safety Element EIR, provided below, which would further ensure that impacts with respect to police protection are less than significant. Therefore, Project impacts would be less than significant and no further analysis of this topic in the EIR is required.

Mitigation Measures

MM 4.12-2(a) Crime Prevention Unit Consultation

For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department’s Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department’s Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department’s Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM 4.12-2(b) Security During Construction

During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site.

Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.

c. Schools?

Less Than Significant Impact. A significant impact may occur if a project results in the need for new or expanded schools, the construction of which would result in environmental impacts. The Project Site is currently served by the following LAUSD public schools: 3rd Street Elementary School, located at 201 S. June Street, which serves kindergarten through fifth-grade students; John Burroughs Middle School, located at 600 S. McCadden Place, which serves sixth- through eighth-grade students; and Fairfax Senior High School, located at 7850 Melrose Avenue, which serves ninth- through twelfth-grade students.

As shown in Table XV-2, the Project would generate a total of approximately 154 students, including 79 elementary students, 21 middle school students, and 45 high school students, as well as an additional nine students based on the Project's 37 employment positions.¹³⁷ It is likely that some of the students generated by the Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools.

Further, the number of Project-generated students that would actually attend the LAUSD schools serving the Project Site may be less than the students calculated since the analysis does not take into account options to allow Project-generated students to receive education elsewhere. These options that may reduce student population at LAUSD schools include the following:

- Private schools;
- Home-schooling;

¹³⁷ The LAUSD student generation rates only provide a rate for students per employee, and this rate is not broken down by elementary, middle, and high school students.

- Open enrollment that enables students anywhere within the district to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats;
- Magnet schools and magnet centers that are open to all students in the LAUSD. Transportation is provided to students who participate in magnet programs who live outside a two-mile radius for elementary students, five-mile radius for secondary students, or outside the magnet school attendance boundary;
- The Permits With Transportation (PWT) program, which provides transportation for students seeking a more integrated experience to schools outside their home attendance area;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area in which the student’s parent is regularly employed;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area in which a younger sibling is cared for daily during after school hours by a known child care agency, private organization, or verifiable child care provider.

However, the Project would be required to pay school facilities fees pursuant to SB 50, which would be used to construct, modernize, or reconstruct facilities. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by Education Code Section 17620 or Government Code Sections 65970 and following may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. Subdivision (h) of section 65995 declares that the payment of the development fees authorized by Education Code Section 17620 is “full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities.”¹³⁸ California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district’s levy of the fees authorized by California Education Code Section 17620. Provisions of the California Education Code, principally the Leroy F. Greene School Facilities Act of 1998, set a maximum level of fees that may be imposed upon a project developer to mitigate a project’s impacts on school facilities. The maximum fees authorized under the Education Code apply to zone changes, general plan amendments, zoning permits, and subdivisions. Education Code Section 65995 provides that such funding mechanisms are the exclusive means of requiring mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other State or local law. The Project

¹³⁸ Cal Gov Code Section 65995: <http://codes.lp.findlaw.com/cacode/GOV/1/7/d1/4.9/s65995>.

Applicant will be required to pay mandatory developer fees to offset the Project’s demands upon local schools. Thus, the Project’s potential impact upon public school services would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

**Table XV-2
Estimated Project Student Generation**

Land Use	Size	School Type	Student Generation Rate ¹	Total Students Generated
Residential	348 du	Elementary	0.2269/du	79
		Middle	0.0611/du	21
		High	0.1296/du	45
Commercial	37 employees	--	0.2354/employee	9
Total				154
du = dwelling unit				
¹ Los Angeles Unified School District, School Fee Needs Analysis, March 2020.				

d. Parks

Less Than Significant Impact. A significant impact may occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the area of the Project Site. The LADRP facilities closest to the Project Site include: (1) the Pan Pacific Park and Recreation Center at 7600 Beverly Boulevard, which has a pool, outdoor play equipment, sport courts and fields, and a jogging path; (2) the Carthay Circle Park at McCarthy Vista and Crescent Heights, which has a grass area and a bench; and (3) the Pointsettia Recreation Center at 7341 Willoughby Avenue, which has outdoor play equipment, sport courts and fields, and outdoor fitness equipment.¹³⁹

Per the Public Recreation Plan (PRP) long-range Citywide standard (two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks), the City’s standard ratio of neighborhood and community parks to population is four acres per 1,000 persons. Based on the combined neighborhood and community parkland per population ratio of four acres per 1,000 persons, the Project would generate demand for approximately 3.2 acres of new neighborhood and community parkland.¹⁴⁰

¹³⁹ Los Angeles Department of Recreation and Parks, Facility Map Locator, website: [https://www.laparks.org/maplocator?cat_id=All&geo\[radius\]=2&geo\[latitude\]=34.0664817&geo\[longitude\]=-118.3520389&address=Los%20Angeles,%20CA%20900036,%20USA](https://www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0664817&geo[longitude]=-118.3520389&address=Los%20Angeles,%20CA%20900036,%20USA), accessed June 4, 2022.

¹⁴⁰ 810 residents/1,000 x 4 = 3.2 acres.

The Project would provide approximately 38,592 square feet of indoor and outdoor open space. Pursuant to LAMC Section 12.21.G.2(a)(4)(i), a maximum of 25% of the Project's total required open space may be provided as interior recreation rooms. The Project would provide approximately 9,388 square feet (25%) of its required open space in indoor recreation areas on the third, fourth, and fifth levels, which would include such amenities as shared workspace areas, library, fitness center, and spa. Outdoor common open space would be provided on the third and fourth levels. Level 3, on the rooftop of the 5401 Wilshire Boulevard building, would include approximately 7,513 square feet of open space. The Level 4 podium deck would provide approximately 21,691 square feet of open space including recreational amenities such as sitting areas and a pool & spa. Overall, the Project includes 38,592 square feet of open space, or 0.89 acres. Due to the amount, variety, and availability of the proposed open space and recreational amenities to be included within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs.

In addition, pursuant to LAMC Section 12.33 and Ordinance No. 184,505 (Parks Dedication and Fee Update ordinance), most residential projects that create new dwelling units or joint living and work quarters may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. The LADRP is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, and issuing the fee calculation letters to Project applicants. The requirements of LAMC Section 12.33, regarding park fees, contemplate offsets under certain circumstances against Dwelling Unit Construction Tax that are also assessed in accordance with LAMC Section 21.10.3(a)(1). Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to LAMC Section 12.33, and would mitigate the impact the Project will have on public resources such as parks and recreational facilities.¹⁴¹

Based on the above, the Project would meet the applicable requirements of the LAMC regarding the provision of on-site open space and the payment of park fees. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that would require the provision of new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts. Therefore, impacts to parks and recreational facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in the Draft EIR is required.

e. Other public facilities

Less Than Significant Impact. A significant impact may occur if a project results in the need for new or expanded government facilities, the construction of which would result in environmental impacts. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch

¹⁴¹ City of Los Angeles Department of Recreation and Parks – Park Fees: <https://www.laparks.org/planning/park-fees>.

libraries, as well as through web-based resources.¹⁴² The LAPL branches currently serving the Project Site include the Fairfax Branch Library, located at 161 S. Gardner Street; the Memorial Branch Library, located at 4625 W. Olympic Boulevard; and the John C. Fremont Branch Library, located at 6121 Melrose Avenue.¹⁴³

The LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square-foot facilities for communities with less than a population of 45,000 and 14,500 square-foot facilities for communities with a population of more than 45,000. As discussed in Section XIV, Population and Housing, the Project is estimated to generate approximately 810 residents. Therefore, the Project's residential population alone (810 residents) is not of the size that would necessitate the need for a new or physically altered branch library, as the smallest branch libraries are designed to serve populations of up to 45,000 residents. Further, it is likely that Project residents would have individual access to internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.^{144,145}

Overall, the Project would not be anticipated to result in a substantial increase in demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Potential Project impacts would be reduced by several factors. First, all three of the aforementioned libraries are accessible to the Project residents and are within a two mile radius of the Project Site. Second, as noted above, the Project's increase in demand for library services in and of itself would not reach the recommended level at which the LAPL would consider building a new branch library in the area. Further, the City's CEQA Thresholds Guide considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities which studies have shown to reduce demand at physical library locations. In addition, the Project would generate revenue for the City's general fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be used for the provision of public services such as library facilities. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Additionally, LAPL has been increasing their online services, including a variety of e-books, study

¹⁴² Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020.

¹⁴³ Los Angeles Public Library, Find A Library, https://lapl.org/branches?distance%5Bpostal_code%5D=90036&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed November 17, 2021.

¹⁴⁴ "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": <http://www.nea.gov/research/toread.pdf>.

¹⁴⁵ "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

materials, and support, available to users through the LAPL online resources.¹⁴⁶ These online sources would further reduce the Project's impacts on LAPL services.

Based on the above, and pursuant to the library sizing standards recommended in the LAPL Branch Facilities Plan, operation of the Project would not result in the need for new or altered facilities, or substantially increase the demand for library services for which current and future demand would exceed the ability of the facility to adequately serve the population. The Project would also generate approximately 37 employees. Employees do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. Further, it is likely that similar to Project residents, Project employees would also have individual access to internet service, which would reduce demand at physical library locations. Therefore, potential impacts to library service and facilities resulting from the Project would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁴⁶ Los Angeles Public Library, Strategic Plan 2015-2020, page 12.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. A significant impact may occur if a project would increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. LADRP operates and maintains park and recreational services and facilities in the area of the Project Site. The LADRP facilities closest to the Project Site include: (1) the Pan Pacific Park and Recreation Center at 7600 Beverly Boulevard, which has a pool, outdoor play equipment, sport courts and fields, and a jogging path; (2) the Carthay Circle Park at McCarthy Vista and Crescent Heights, which has a grass area and a bench; and (3) the Pointsettia Recreation Center at 7341 Willoughby Avenue, which has outdoor play equipment, sport courts and fields, and outdoor fitness equipment.¹⁴⁷

As discussed above in subsection XIV, Population and Housing, the Project would generate approximately 810 residents who could potentially use nearby parks and recreational facilities. Employees generated by the Project would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities and would therefore not contribute to the future demand on recreational facilities. Additionally, the City's parkland acreage-to-population ratios are based on residential population and not employee population. Per the Public Recreation Plan (PRP) long-range Citywide standard (two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks), the City's standard ratio of neighborhood and

¹⁴⁷ Los Angeles Department of Recreation and Parks, Facility Map Locator, website: [https://www.laparks.org/maplocator?cat_id=All&geo\[radius\]=2&geo\[latitude\]=34.0664817&geo\[longitude\]=-118.3520389&address=Los%20Angeles,%20CA%2090036,%20USA](https://www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0664817&geo[longitude]=-118.3520389&address=Los%20Angeles,%20CA%2090036,%20USA), accessed June 4, 2022.

community parks to population is four acres per 1,000 persons. Based on the combined neighborhood and community parkland per population ratio of four acres per 1,000 persons, the Project would generate demand for approximately 3.2 acres of new neighborhood and community parkland.¹⁴⁸

Outdoor common open space would be provided on the third and fourth levels. Level 3, on the rooftop of the 5401 Wilshire Boulevard building, would include approximately 7,513 square feet of open space. The Level 4 podium deck would provide approximately 21,691 square feet of open space including recreational amenities such as sitting areas and a pool & spa. Indoor amenities include shared workspace areas, library, fitness center, and spa. Overall, the Project includes 38,592 square feet of open space, or 0.89 acres. It is anticipated that the amenities and open space included within the Project would be sufficient to meet much, if not all, of the recreational needs of the Project residents.

Pursuant to LAMC Section 12.33 and Ordinance No. 184,505 (Parks Dedication and Fee Update ordinance), most residential projects that create new dwelling units or joint living and work quarters may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. The LADRP is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, and issuing the fee calculation letters to Project applicants. The requirements of LAMC Section 17.12 regarding park fees require that the Project pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1). Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to Ordinance 184,505, and would mitigate the impact the Project will have on public resources such as parks and recreational facilities.¹⁴⁹ The payment of this fee is deemed to provide full and complete mitigation for impacts to parks and recreational facilities. Therefore, impacts to parks and recreational facilities would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. The Project does not propose public recreational facilities. Pursuant to LAMC Section 12.21 G, the Project is required to provide 37,550 square feet of open space, and would provide 38,529 square feet of open space, including both indoor and outdoor open space. Outdoor common open space would be provided on the third and fourth levels. Level 3, or the rooftop of the 5401 Wilshire Boulevard building, would include approximately 7,513 square feet of open space. The Level 4 podium deck would provide approximately 21,691 square feet of open space including recreational amenities such as sitting areas and a pool & spa. Indoor amenities include shared workspace areas, library, fitness center, and spa. As also discussed

¹⁴⁸ $810/1,000 \times 4 = 3.2$ acres.

¹⁴⁹ City of Los Angeles Department of Recreation and Parks – Park Fees: <https://www.laparks.org/planning/park-fees>.

above, regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to LAMC Section 12.33, and would mitigate the impact the Project will have on public resources such as parks and recreational facilities.¹⁵⁰

In addition, the Project does not include the construction of recreational facilities outside of the Project Site boundaries, such as a park, and therefore, impacts to recreational facilities would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁵⁰ City of Los Angeles Department of Recreation and Parks – Park Fees: <https://www.laparks.org/planning/park-fees>.

XVII. 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, or ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

- Appendix G-1** Transportation Assessment Report, 688 S. Cochran Avenue Mixed-Use Project, Hirsch/Green Transportation Consulting, Inc., May 2022.
- Appendix G-2** Transportation Assessment Letter, LADOT, December 20, 2021.
- Appendix G-3** Transportation Assessment Letter Update, LADOT, May 23, 2022.
- Appendix G-4** VMT and Trip Generation Updates Related to Modifications to Residential Component, Hirsch/Green Transportation Consulting, Inc., August 9, 2023.
- Appendix G-5** Second Transportation Assessment Letter Update, LADOT, August 16, 2023.

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

Less Than Significant Impact. This impact criterion identifies whether a proposed development project is consistent with City goals for achieving an accessible and sustainable transportation system by reducing the number of vehicle miles traveled, and providing safe and convenient streets for all users, including pedestrians, bicyclists, motorists, and public transit riders. LADOT's Transportation Assessment Guidelines (TAG, July 2020) provide a list of the applicable plans and policies, along with a checklist of "guiding" questions to assist with the evaluation of the proposed project's compatibility with the City's transportation goals.

Specifically, the TAG identifies the following City plans, policies, and ordinances for review:

- Los Angeles (City) Mobility Plan 2035
- Plan for a Healthy Los Angeles
- Specific Plans (as appropriate)
- Los Angeles Municipal Code (LAMC) Section 12.21 A.16 (Bicycle Parking)
- LAMC Section 12.26 J (Transportation Demand Management [“TDM”] Ordinance)
- Vision Zero Action Plan and Corridor Plans
- Streetscape Plans
- Citywide Design Guidelines:
 - Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all
 - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience
 - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

Attachment D of the current (July 2020) LADOT TAG provides a worksheet for use in determining a proposed project’s consistency with the City’s various transportation-related plans, policies, and ordinances, and the responses to the various “guiding” questions contained in that worksheet are provided in Appendix C of the Transportation Assessment, which is included in Appendix G of this Initial Study. Based on this worksheet, the Project is either compatible with the relevant criteria associated with the plans and policies listed above and/or identified in Attachment D of the TAG, or will not preclude the implementation of any elements of those plans/programs related to providing and maintaining a sustainable transportation network.

Specifically, the Project is consistent with the access-related guidelines of the Mobility Plan 2035 and Vision Zero policies, with no vehicular access (driveways) proposed along Wilshire Boulevard (which is part of the City’s High Injury Network). Additionally, the Project will maintain or increase (via a three-foot dedication on Cochran Avenue) the existing sidewalk widths adjacent to its frontages, retain the existing signalized crosswalks at the site-adjacent intersections along its Wilshire Boulevard frontage (at Cochran Avenue and Cloverdale Avenue), and locate all Project parking in an on-site parking garage accessed from the side streets (no on-street parking is proposed or affected by the Project), thereby providing safe and convenient pedestrian circulation. Further, the Project will conform to the LAMC’s bicycle parking requirements, and is therefore

consistent with the City's policies related to the reduction of both vehicle trips and VMT through the implementation of these measures.

Therefore, the Project would conform to, or would not preclude the future implementation of, any of the applicable plans, programs, and policies related to the City's transportation network, and as a result, Project impacts would be less than significant. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. This impact criterion is used to determine whether a proposed project would result in a significant increase in VMT, based on its consistency with Section 15064.3, Subdivision (b)(1) of the current CEQA Guidelines, which discusses the specific considerations for evaluating a project's impacts to the City's transportation network, noting that "...[generally], projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." As described previously, the Project is located along Wilshire Boulevard, which is designated as a Transit Enhanced Corridor in the City's Mobility Plan 2035 (served by Metro Bus Line 720, including a Project-serving stop between Cochran Avenue and Cloverdale Avenue), and is within 625 feet of the entrance to the new Metro Purple Line (D Line) extension station at Wilshire Boulevard and La Brea Avenue (currently under construction).

The TAG, which is consistent with the State-mandated requirements of SB 743, also includes two screening criteria for evaluating a project's potential VMT-related impacts:

- Would the land use project generate a net increase of 250 or more daily vehicle trips; and
- Would the project generate a net increase in daily VMT.

The current version of the VMT Calculator (Version 1.4) provides a screening page for use in determining whether a project meets these VMT screening thresholds, and would therefore be required to prepare a detailed VMT impact analysis.

VMT Analysis Screening Procedure and Results

As shown in the VMT Calculator screening evaluations, the Project itself is estimated to generate a total of 1,943 vehicle trips per day and 11,999 total daily VMT, while the existing on-site developments produce a total of 1,766 daily vehicle trips and 11,550 daily VMT (not including the potential traffic and daily VMT associated with a total of about 800 square feet of entitled but currently vacant retail floor area located within the 5401 Wilshire Boulevard building), resulting in net Project-related increases of about 177 vehicle trips per day and 449 daily VMT. Therefore, based on the criteria established by the City pursuant to the requirements of SB 743, the VMT screening procedures show that the Project would not meet the 250 net daily trip increase

threshold for requiring the preparation of a detailed VMT impact assessment. Nevertheless, a supplemental VMT analysis has been prepared for the Project and is described below.

Project VMT Impact Evaluation

As defined in Threshold T-2.1 of the TAG, a significant project-related VMT impact is deemed to occur if a project generates a “household per capita VMT” (for residential components) or “per employee VMT” (for any commercial uses) exceeding a threshold of 15 percent below the average per capita or per employee VMT of the Area Planning Commission (APC) area in which the project is located, although the TAG also identifies that the commercial portions of a development project that are comprised of less than 50,000 square feet of restaurant, retail, or other similar small-scale, local-serving, uses are assumed to have less than significant impacts. The Project is located within the Central APC, which as identified in Table 2.2-1 of the TAG, exhibits a daily household VMT per capita impact significance threshold of 6.0, along with a daily work VMT per employee impact significance threshold of 7.6.

As recommended in the TAG, the VMT Calculator was used to determine if the Project would result in any significant VMT impacts. The procedures for calculating and evaluating the Project’s potential VMT impacts are similar to and based upon the same land use information as the preceding Threshold T-2.1 screening evaluations, but are expanded to consider the effects of any applicable trip and/or VMT-reducing measures contained in the “TDM Strategies” toolbox of the VMT Calculator, either as an integral part of the Project itself (“Project feature”) or as mitigation for any significant VMT-related impacts that may be identified by the analyses.

Therefore, the VMT analysis prepared for the Project included the following Project features:

- Reduce Parking Supply: based on the provision of parking that is less than required by the LAMC;
- TDM Education and Encouragement: based on the provision of public transit and/or alternative transportation information to all Project residents and employees; and
- Bicycle Infrastructure: based on the provision of on-site bicycle parking.

The resulting VMT Calculator worksheets (which show the trip and VMT values for the Project only) are provided in Appendix G-4 of this Initial Study. As shown in Table XVII-1 below, with these measures, the Project is expected to result in a total daily VMT of 10,368. In addition, the per capita household VMT value would be less than significant. Further, the TAG identifies that the commercial portions of a development project that are comprised of less than 50,000 square feet of restaurant, retail, or other similar small-scale uses are assumed to be local-serving and therefore would have less than significant impacts. The Project’s proposed approximately 12,821 square foot commercial component would contain less than 50,000 square feet of small-scale, local-serving (retail, restaurant, cafe) uses, and as such, its effects on per employee work VMT are considered to be less than significant. Therefore, the Project’s potential increases to per capita

or per employee VMT levels would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

**Table XVII-1
VMT Analysis Summary**

Land Use Information	Project with Design Features	Project without Design Features
Multi-family housing	319 units	319 units
Affordable housing	29 units	29 units
Retail	7,378 square feet	7,378 square feet
High-turnover restaurant	4,443 square feet	4,443 square feet
Café	1,000 square feet	1,000 square feet
VMT Analysis		
Resident Population	810	810
Employee Population	37	37
Project Area Planning Commission	Central	Central
Daily VMT	10,368	11,999
Household VMT per capita	N/A	N/A
Impact threshold	6.0	6.0
Significant impact?	No	No
Work VMT per employee	N/A ^a	N/A ^a
Impact threshold	7.6	7.6
Significant impact?	No	No
Source: Hirsch/Green Transportation Consulting, August 2023.		
^a As the Project includes less than 50,000 square feet of commercial uses, the VMT impacts for the commercial portion of the Project are less than significant.		

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. LADOT’s TAG requires that development projects that require discretionary action by the City must evaluate whether a project would substantially increase hazards due to a geometric design feature or incompatible use. This CEQA impact evaluation criterion is used to determine if a new development project would cause detrimental effects to vehicular, bicycle, pedestrian, or public transit activity due to the design, location, and/or operations of its vehicular access points (generally, its driveways). The TAG identifies two screening criteria related to this evaluation:

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?
- Is the project proposing to, or required to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

The Project Site currently includes a total of four driveways, with two driveways each along both Cochran Avenue and Cloverdale Avenue. The Project itself will provide a total of four site access driveways, including its primary commercial driveway on Cochran Avenue, primary residential driveway on Cloverdale Avenue, an entry-only driveway for the on-site passenger drop-off/pick-up area and loading facilities along Cochran Avenue immediately south of the commercial driveway, and an exit-only driveway for the passenger/loading area on Cloverdale Avenue, just south of the residential driveway. As a result, the total number of site driveways will remain unchanged. Additionally, the first screening criterion is related only to the construction of new driveways along Avenue or Boulevard roadways, and therefore, is not applicable to the Project, which provides all of its access driveways along either Cochran Avenue, a Collector Street, or Cloverdale Avenue, a Local Street.¹⁵¹

Similarly, the second screening criteria related to this CEQA impact threshold is also applicable only to a project's modifications to roadways exhibiting Avenue or Boulevard classifications. While a right-of-way dedication is required along the Project's Cochran Avenue frontage, no roadway widenings are required, and therefore, there are no changes to the current roadway conditions on Cochran Avenue. Additionally, although the current sidewalk width along the Project's Cloverdale Avenue frontage does not meet the current Mobility Plan 2035 specifications (12-foot width), the (half street) right-of-way dedication does meet the Mobility Plan 2035 requirements, and the existing sidewalk width is deficient by two feet only because the roadway is improved to two feet more than the required 18-foot width. However, pursuant to LAMC Section 12.37 A.5, no additional dedications are required along Cloverdale Avenue simply for the purpose of providing a wider sidewalk. As such, since the existing roadway width on Cloverdale Avenue exceeds the Mobility Plan 2035 requirements, no new roadway widening would be required on Cloverdale Avenue. Finally, no new roadway widenings are required along the Project's Wilshire Boulevard frontage.

Therefore, the Project would not increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant. No mitigation measures would be required and no further analysis of this issue in the EIR is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency access. Vehicular access to the Project Site would be maintained from Cloverdale Avenue and Cochran Avenue. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for

¹⁵¹ Street designations as provided in the Mobility Plan 2035.

new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Furthermore, Section 21055 of the CVC exempts drivers of authorized emergency vehicles from adherence to the rules of the road, and Section 21806 of the CVC requires drivers to yield to emergency vehicles. As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant. No mitigation measures would be required and no further analysis of this issue in the EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact. As discussed above, the Project Site is located within the boundaries of the Miracle Mile Historic District, which was formally determined eligible for listing in the National Register of Historic Places in 1983 and is, therefore, listed in the California Register of Historical Resources. However, neither of the existing buildings (at 5401 and 5407 Wilshire Boulevard) were identified by SurveyLA as potentially eligible for individual designation on a historic register. The existing building at 5407 Wilshire Boulevard is a non-contributing building to the Miracle Mile Historic District, while the building at 5401 Wilshire Boulevard is a contributing building to the Historic District. Therefore, the existing buildings would not be considered tribal

cultural resources as defined in Public Resources Code Section 21074. Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

b. 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 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. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

The Project will comply with all required notification and consultation under AB 52. Under AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Notification letters pursuant to AB 52 were mailed on May 3, 2022, to all contacts on the City's AB 32 Native American Heritage Commission Tribal Consultation List, providing a 30-day period in which any of the tribal contacts could request consultation with the City concerning tribal cultural resources that may be impacted by the Project. In response, the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation with the City. A consultation call between the City and representatives of the Kizh Nation took place on September 29, 2022, and consultation was

formally closed by the City on August 28, 2023 (see closure letter included in Appendix K of this Initial Study). Should tribal cultural resources be inadvertently encountered during Project construction, the Project would comply with Mitigation Measures 4.15-1(a) and 4.15-1(b) from the City's Housing and Safety Element EIR. With implementation of MM 4.15-1(a) and 4.15-1(b), impacts with respect to tribal cultural resources would be less than significant.

Mitigation Measures

MM 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects

All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.

Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.

MM 4.15-1(b) Discovery of Potential Tribal Cultural Resources

In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes.

Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.

The measure shall be shown on plans.

XIX. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following:

Appendix H Utility Infrastructure Technical Report, Mirabel Project, KPFF Consulting Engineers, February 2023.

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. As discussed below, Project impacts related to these issues would be less than significant.

Water

According to the Utility Infrastructure Report (included in Appendix H of this Initial Study), LADWP maintains water infrastructure to the Project Site. Based on available record data provided by LADWP, there are 6-inch water mains in both Cochran Avenue and Cloverdale Avenue and there is an 8-inch water main in Wilshire Boulevard. In addition, there are five existing fire hydrants north of Wilshire Boulevard in the vicinity of the Project Site. A sixth, new hydrant is proposed and would be located adjacent to the Project.

Construction

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water uses range from 1,000 to 2,000 gallons per day (gpd). Since the anticipated water usage during construction would be significantly less than the water usage demand for Project operation (58,775 gpd, which is determined below to have a less than significant impact), impacts to water supplies due to construction activities would be less than significant as well.

The Project would also require the construction of new, on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. According to the Utility Infrastructure Report (included in Appendix H of this Initial Study), no upgrades to public water mains are anticipated. Therefore, Project impacts on water infrastructure associated with construction activities would be less than significant.

Operation

The analysis of the Project's water demand considers the projected demands for both fire suppression and domestic water use. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure. The projected demands for fire suppression and domestic water use are described below.

Fire Water Demand

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project falls within the Industrial and Commercial land use category, which has a required fire flow of 6,000 gallons to 9,000 per minute (gpm) from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP regarding available fire hydrant flow, the results of which are included in Exhibit 1 of the Utility Infrastructure Report (which is included as Appendix H of this Initial Study). The IFFAR shows six nearby hydrants flowing simultaneously for a combined 6,400

gpm, which demonstrates that the Project Site currently has adequate fire flow to serve the Project, in compliance with LAMC Section 57.507.3.

The Project will also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which would be subject to Fire Department review and approval during the design and permitting of the Project. A Service Advisory Report (SAR), included in the Utility Infrastructure Report (which is Appendix H of this Initial Study) was submitted to LADWP to determine whether the existing public water infrastructure can meet the demands of the Project. The SAR for the 6-inch water main in Cloverdale Avenue, where the Project proposes to connect for fire and domestic water, shows a static pressure of 83 pounds per square inch and that a flow of 1,400 gpm can be delivered to the Project Site with a residual pressure of 59 pounds per square inch. The estimated maximum fire service demand is 1,400 gpm from two, redundant 6-inch services which can be isolated from one another in the event of system degradation. The SAR shows that the available water pressure satisfies the private water system demands. Therefore, Project impacts with respect to fire water demand and infrastructure would be less than significant.

Domestic Water Demand

As shown in Table XIX-1, below, the Project is expected to increase the total net water demand by 58,775 gpd.

According to the Utility Infrastructure Technical Report (included in Appendix H of this Initial Study), LADWP's 2020 Urban Water Management Plan (UWMP) provides an analysis of water supplies and demands and anticipates a sustainable water supply for the City of Los Angeles for the next 25 years. The Project is consistent with the zoning and land use designation for the Project Site, which indicates general consistency with the assumptions used to prepare the UWMP. As such, the water demand associated with the Project is within the projections contained in the 2020 UWMP while anticipating normal, dry, and multiple dry year water conditions. In addition, the SAR (included in the Utility Infrastructure Report, which is included as Appendix H to this Initial Study), which is inclusive of anticipated domestic water demands, shows that the existing infrastructure is sufficient to meet the water demand of the Project. Therefore, Project impacts related to the construction or relocation of new facilities associated with water infrastructure would be less than significant, and no further analysis of this topic in the EIR is required.

**Table XIX-1
Estimated Water Consumption**

Use	Water Consumption (GPD/1,000 SF)¹	Quantity	Units	Total (GPD)
Existing Uses (to be removed)				
Retail ²	25	38.5	KGSF	964
Existing Water Consumption				964
Proposed Uses				
Auto Parking ³	20	194	KGSF	3,880
Studio Unit ⁴	75	136	DU	10,200
1 Bdrm Unit ⁵	110	102	DU	11,220
2 Bdrm Unit ⁶	150	110	DU	16,500
Lounge Space ⁷	50	32.7	KGSF	1,635
Office ⁸	120	6.5	KGSF	780
Pools and Spa ⁹	--	--	--	844
Fitness Room ¹⁰	650	3.55	KGSF	2,308
Restaurant ¹¹	30	330	Seats	9,900
Coffee House ¹²	720	1	KGSF	720
Retail ²	25	7.4	KGSF	185
Laundry ¹³	185	4	Machines	740
Landscape Irrigation ¹⁴	--	--	--	827
Proposed Total Water Consumption				59,739
Net Increase in Water Consumption				58,775

DU = Dwelling Units
GPD = Gallons Per Day
KGSF = 1,000 Gross Square Feet
Source: KPFF Engineers, Utility Infrastructure Technical Report (included in Appendix H of this Initial Study), Table 5.

¹ Average daily water consumption is based on 100% of LASAN Sewage Generation Factors.
² Retail areas considered as "Retail Area (Less than 100,000 SF)" for water consumption purposes.
³ Non-automated parking areas considered as "Auto Parking" for water consumption purposes.
⁴ Studio unit considered as "Residential: Apt – Bachelor" for water consumption purposes.
⁵ 1-bedroom units considered as "Residential: Apt – 1 BDR" for water consumption purposes.
⁶ 2-bedroom units considered as "Residential: Apt – 2 BDR" for water consumption purposes.
⁷ Lounge space includes lobbies, library, mailroom, and other general gathering spaces on Levels 1, 3, 4, and 43, considered as "Lounge" for water consumption purposes.
⁸ Office space includes co-working spaces and leasing office, considered as "Office Building" for water consumption purposes.
⁹ Pool and spa water consumption calculated using (A) assumed evaporation rate of 0.094 gpd/sf (per LADWP methodology) applied over pool surface areas of 1,369 sf (lap pool) + 1,012 sf (adult pool) + 389 sf (reflective pool) + 163 sf (adult spa); plus (B) weekly backwash of filters (2 pumps @ 100-gpm for 20-min per week = 571/gpd); yielding a total of 844 gpd.
¹⁰ Fitness spaces are considered "Health Club/Spa" for water consumption purposes.
¹¹ Restaurant considered as "Restaurant: Full Service Indoor Seat" for water consumption purposes.
¹² Coffee house considered as "Coffee House: Pastry Baking Only" for water consumption purposes.
¹³ Laundry area/washing machines on Level 3 are considered "Laundromat" for water consumption purposes.
¹⁴ Irrigation demand provided by landscape architect. Water use estimate per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.

Wastewater

LA Sanitation (LASAN) operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City of Los Angeles incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The wastewater generated by the Project would ultimately flow to the Hyperion Treatment Plant (HTP) System. The existing design capacity of the Hyperion Service Area is approximately 550 mgd and the existing average daily flow for the system is approximately 300 mgd.¹⁵²

According to the Utility Infrastructure Report (included in Appendix H of this Initial Study), there are 8" sanitary sewer mains flowing southward in Cochran Avenue and Cloverdale Avenue along the Project Site, emptying into an 18" sanitary sewer main flowing westward alongside the Project Site. The Project Site has multiple sanitary sewer laterals that connect site flows to each of these three adjacent mains.

- An 8" sewer main in Cloverdale Avenue flows southward to Wilshire Boulevard and has a calculated design capacity of 0.86917 cubic feet per second (cfs) (0.562 mgd) according to the City of LA Bureau of Engineering online Navigate LA utility database.
- An 8" sewer main in Cochran Avenue flows southward to Wilshire Boulevard and has a calculated design capacity of 0.77741 cfs (0.502 mgd) according to the City of LA Bureau of Engineering online Navigate LA utility database.
- An 18" sewer main in Wilshire Boulevard receives flows from the mains in Cloverdale and Cochran Avenues, as well as from Project Site laterals, and flows westward with a calculated design capacity of 0.77741 cfs (2.674 mgd) according to the City of LA Bureau of Engineering online Navigate LA utility database.

The City sewer network ultimately conveys wastewater to the Hyperion Sewage Treatment Plant.

Construction

Project construction activities would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

¹⁵² City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.

The Project would require construction of new on-site infrastructure to serve the new building. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. According to the Utility Infrastructure Report (included in Appendix H of this Initial Study), no upgrades to the public main are anticipated. When considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

Operation

As shown in Table XIX-2, below, the Project would generate a net increase of 57,675 gpd of wastewater.

A Sewer Capacity Availability Request (SCAR) was submitted to LASAN to verify that the existing public infrastructure can accommodate the Project. In response, LASAN has analyzed the Project demands in conjunction with existing conditions and forecasted growth, and has approved the Project to discharge up to 892,701 gpd of wastewater to the existing 8-inch sewer lines in Cloverdale and Cochran Avenues and the existing 18-inch sewer line in Wilshire Boulevard. The approved SCAR is Exhibit 3 of the Utility Infrastructure Report, which is included as Appendix H of this Initial Study.

As stated above, the existing design capacity of the 18” sewer line along Wilshire Boulevard has a capacity of 0.77741 cfs (2.674 mgd) according to the City of LA Bureau of Engineering online Navigate LA utility database. As shown in Table XIX-2, the Project’s net increase of sewage generation is calculated to be 57,675 gpd, which represents approximately 2.16 percent of the existing pipe’s capacity. Therefore, Project impacts on wastewater infrastructure would be less than significant.

Looking downstream, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).¹⁵³ The Project’s proposed wastewater generation is approximately 0.06 mgd, which is approximately 0.01 percent of the Hyperion Treatment Plant’s design capacity. Therefore, Project impacts on wastewater treatment capacity would also be less than significant. No further analysis of this topic in the EIR is required.

¹⁵³ City of Los Angeles Department of Public Works, LA Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_afLoop=12383804760802391&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=1c55he77nw_1#%40%40%3F_afWindowId%3Dnull%26_afLoop%3D12383804760802391%26_afWindowMode%3D0%26_adf.ctrl-state%3D1c55he77nw_5, accessed August 2021.

**Table XIX-2
Estimated Wastewater Generation**

Use	Sewage Generation (GPD/1,000 SF)¹	Quantity	Units	Total (GPD)
Existing Uses (to be removed)				
Retail ²	25	38.5	KGSF	964
Existing Wastewater Generation				964
Proposed Uses				
Auto Parking ³	20	194	KGSF	3,880
Studio Unit ⁴	75	136	DU	10,200
1 Bdrm Unit ⁵	110	102	DU	11,220
2 Bdrm Unit ⁶	150	110	DU	16,500
Lounge Space ⁷	50	32.7	KGSF	1,635
Office ⁸	120	6.5	KGSF	780
Pools and Spa ⁹	--	--	--	571
Fitness Room ¹⁰	650	3.55	KGSF	2,308
Restaurant ¹¹	30	330	Seats	9,900
Coffee House ¹²	720	1	KGSF	720
Retail ²	25	7.4	KGSF	185
Laundry ¹³	185	4	Machines	740
Proposed Total Wastewater Generation				58,639
Net Increase in Wastewater Generation				57,675
DU = Dwelling Units GPD = Gallons Per Day KGSF = 1,000 Gross Square Feet Source: KPFF Engineers, Utility Infrastructure Technical Report (included in Appendix H of this Initial Study), Table 6. ¹ Average daily wastewater flows are based on LASAN Sewage Generation Factors. ² Retail areas considered as "Retail Area (Less than 100,000 SF)" for water consumption purposes. ³ Non-automated parking areas considered as "Auto Parking" for water consumption purposes. ⁴ Studio unit considered as "Residential: Apt – Bachelor" for water consumption purposes. ⁵ 1-bedroom units considered as "Residential: Apt – 1 BDR" for water consumption purposes. ⁶ 2-bedroom units considered as "Residential: Apt – 2 BDR" for water consumption purposes. ⁷ Lounge space includes lobbies, library, mailroom, and other general gathering spaces on Levels 1, 3, 4, and 43, considered as "Lounge" for water consumption purposes. ⁸ Office space includes co-working spaces and leasing office, considered as "Office Building" for water consumption purposes. ⁹ Pool and spa wastewater generation calculated using assumed weekly backwash of filters – 2 pumps at 100 gallons per minute per week = 571 gallons per day. ¹⁰ Fitness spaces are considered "Health Club/Spa" for water consumption purposes. ¹¹ Restaurant considered as "Restaurant: Full Service Indoor Seat" for water consumption purposes. ¹² Coffee house considered as "Coffee House: Pastry Baking Only" for water consumption purposes. ¹³ Laundry area/washing machines on Level 3 are considered "Laundromat" for water consumption purposes.				

Storm Water Drainage

For a full discussion of storm water drainage, please see Section X (Hydrology and Water Quality), of this IS. As discussed therein, Project impacts related to storm water drainage would be less than significant and no further analysis of this topic in the EIR is required.

Natural Gas

For a full discussion of Project impacts with respect to natural gas, please see Section VI (Energy) of this IS. As discussed therein, Project impacts related to natural gas would be less than significant and no further analysis of this topic in the EIR is required.

Electricity

For a full discussion of Project impacts with respect to electricity, please see Section VI (Energy) of this IS. As discussed therein, Project impacts related to electricity would be less than significant and no further analysis of this topic in the EIR is required.

Telecommunications

In the Project area, existing telephone and internet service is readily available from a variety of providers, and existing cable television is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant and no further analysis of this issue in the EIR is required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. As concluded in LADWP's 2020 UWMP, projected water demand for the City would be met by the available supplies during an average year, single dry year, and multiple dry years in each year from 2025 to 2045.

As shown on Table XIX-1, the Project would consume approximately 58,775 gallons of water per day (or 0.06 mgd). According to LADWP, if a project is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the

most recently adopted UWMP, which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated. The Project is consistent with the City's General Plan land use designation for the Project Site. In addition, as discussed in response to Checklist Question XIV(a) (Population and Housing), the Project's estimated population growth would be within the population projections contained in SCAG's most recent 2020-2045 RTP/SCS. Thus, the Project's demand for water could be accommodated by LADWP's existing and projected water supplies, including during normal, dry, and multiple dry years. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant and no further analysis of this issue in the EIR is required.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant.¹⁵⁴ The Project's proposed wastewater generation is approximately 0.06 mgd, which is approximately 0.01 percent of the Hyperion Treatment Plant's design capacity.

Various factors, including future development of new treatment plants, upgrades, and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the capacity of the Hyperion Service Area in 2027, the year which the Project is expected to become operational. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2027. Thus, based on this conservative assumption, the capacity of the Hyperion Treatment Plant in 2027 would continue to be 450 mgd.

Based on LASAN's average flow projections for the Hyperion Treatment Plan, it is anticipated that average flows in 2027, the Project's buildout year, would be approximately 269.3 mgd.¹⁵⁵

¹⁵⁴ City of Los Angeles Department of Public Works, LA Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_afLoop=12383804760802391&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=1c55he77nw_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D12383804760802391%26_afWindowMode%3D0%26_adf.ctrl-state%3D1c55he77nw_5, accessed August 2021.

¹⁵⁵ Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES. 1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Treatment Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2027 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) / 10 \times 7] + 256 = 269.3 \text{ mgd}$.

Accordingly, the future remaining available capacity in 2027 would be approximately 180.7 mgd.¹⁵⁶ The Project's increase in average daily wastewater flow of 0.06 mgd would represent approximately 0.033 percent of the estimated future remaining available capacity of 180.7 mgd of the Hyperion Treatment Plant.¹⁵⁷ Therefore, wastewater generated by the Project would be accommodated by the future capacity of the Hyperion Treatment Plant. Therefore, Project impacts related to wastewater treatment would be less than significant and no further analysis of this issue in the EIR is required.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals. The landfills that serve the City and the capacity of these landfills are shown on Table XIX-3. As shown, the landfills have an approximate available daily intake of 19,957 tons.

**Table XIX-3
Landfill Capacity**

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	2019 Average Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	10	10.97	5,548	2,079	3,469
Chiquita Canyon	28	56.99	12,000	5,436	6,564
Lancaster	22	9.95	5,100	357	4,743
Sunshine Canyon	18	55.16	12,100	6,919	5,181
Total					19,957
Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020.					

Construction

As shown in Table XIX-4, the Project would result in approximately 4,375 tons of construction and demolition waste over the entirety of the construction period, not accounting for any mandatory recycling. Pursuant to the requirements of Senate Bill 1374¹⁵⁸, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-

¹⁵⁶ 450 mgd – 269.3 mgd = 180.7 mgd.

¹⁵⁷ (0.06 mgd / 180.7 mgd) x 100 = 0.033%.

¹⁵⁸ <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>

hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Given the remaining permitted capacity of the 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.

**Table XIX-4
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Demolition Waste			
Non-residential	38,545 sf	173 pounds / sf	3,334
Construction Waste			
Residential	463,956 sf	4.38 pounds / sf	1,016
Non-residential	12,821 sf	3.89 pounds / sf	25
Total			4,375
<p>Over the entire total schedule of construction. sf = square feet, 1 ton = 2,000 pounds Based on 115 pounds of residential demolition per square foot and 173 pounds of nonresidential demolition per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-3 and Table A-4, pages A-2 to A-3: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf). U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998. Applied generation rates are averages of empirical waste assessments of residential demolition, non-residential demolition, residential construction, and non-residential construction waste streams in the United States. Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf).</p>			

Operation

As shown on Table XIX-5, the Project would generate approximately 1,263 pounds (0.63 tons) of solid waste per day. This total is conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. These regulations include AB 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 Plan, 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 2025.¹⁵⁹

¹⁵⁹ LA Sanitation, Solid Waste Integrated Resources Plan, https://www.lacitiesan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwswirp?_afLoop=9993233491659747&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=1b56s9l1u3_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D9993233491659747%26_afWindowMode%3D0%26_afd.ctrl-state%3D1b56s9l1u3_5, accessed November 18, 2021.

**Table XIX-5
Estimated Solid Waste Generation**

Land Use	Size	Generation Rate¹	Total (lbs)
Proposed Uses			
Multi-Family Units	348 du	4 lbs/day/du	1,392
Cafe	1,000 sf	5 lbs/day/1,000 sf	5
Restaurant	4,443 sf	5 lbs/day/1,000 sf	22
Retail	7,378 sf	5 lbs/day/1,000 sf	37
Subtotal Proposed			1,456
Existing Uses (to be removed)			
Retail	38,545 sf	5 lbs/day/1,000 sf	193
Subtotal Existing (to be removed)			(193)
Total (Proposed – Existing)			1,263
lb = pound tpd = tons per day sf = square feet ¹ Source: CalRecycle Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates , accessed November 18, 2021. Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.			

With a remaining daily intake capacity of approximately 19,957 tons of solid waste per day, the four Class III landfills serving the City that accept residential and commercial solid waste could accommodate the Project’s increase of approximately 0.63 tons of solid waste per day. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Therefore, Project impacts related to solid waste would be less than significant and no further analysis of this issue in the EIR is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its “Zero-Waste-to-Landfill” goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, as well as the City’s Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors. Finally, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site

recycling area or room of specified size. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur and no further analysis of this issue in the EIR is required.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone,¹⁶⁰ or within a City-designated buffer zone.¹⁶¹ Therefore, no impact regarding this topic would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁶⁰ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

¹⁶¹ City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone,¹⁶² or within a City-designated buffer zone.¹⁶³ In addition, the Project Site is flat and is not located in a hillside zone. Therefore, no impact regarding this topic would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone,¹⁶⁴ or within a City-designated buffer zone.¹⁶⁵ Therefore, no impact regarding this topic would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

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 not located in or near a state responsibility area, within a City-designated Very High Fire Hazard Severity Zone,¹⁶⁶ or within a City-designated buffer zone.¹⁶⁷ Therefore, no impact regarding this topic would occur. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

¹⁶² City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

¹⁶³ City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D

¹⁶⁴ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

¹⁶⁵ City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D

¹⁶⁶ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, February 14, 2020.

¹⁶⁷ City of Los Angeles, Safety Element of the Los Angeles General Plan, November 26, 1996, Exhibit D

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with respect to historic resources and noise. Therefore, the EIR will further analyze whether the Project would have a significant impact on noise and historic resources and whether the Project would 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)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to historic resources, noise, and tribal cultural resources resulting from the Project in conjunction with the applicable related projects will be analyzed and documented in the EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. These cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the Project’s incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

With regards to cumulative effects with respect to aesthetics, agricultural resources, air quality, biological resources, cultural resources (archaeological resources and human remains), energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire, as demonstrated below, the Project’s incremental contribution to potential cumulative impacts would not be cumulatively considerable as the Project would either have no impact or a less than significant impact with respect to these topics, and therefore could not combine with other projects to result in cumulative impacts.

Aesthetics

Regarding cumulative aesthetic impacts, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing, as well as lighting, and glare effects. Pursuant to SB 743 and PRC Section 21099, the Project’s aesthetic impacts would not be significant. Given the Project Site’s location in a transit priority area, other residential, mixed-use, and employment center projects located in the vicinity of the Project Site would similarly be anticipated to be located in transit priority areas and therefore, the aesthetic impacts of these projects would also be less than significant. Thus, cumulative impacts associated with aesthetics would be less than significant.

Air Quality

Cumulative impacts with respect to air quality are addressed in Section 6.III (Air Quality), above. As discussed therein, cumulative impacts with respect to air quality would be less than significant.

Agricultural, Forestry, Biological, and Mineral Resources

With regard to cumulative effects on agriculture/forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. The related projects would be required to comply with the Migratory Bird Treaty Act to avoid impacts to nesting birds, where applicable, and would also be subject to the City's tree replacement requirements where the removal of trees is proposed. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts on these resources would be less than significant.

Cultural Resources

With regard to potential cumulative impacts to archaeological resources, paleontological resources, and human remains, such potential impacts are generally site-specific as they relate to the particular underlying conditions of a site. After implementation of mitigation measures, the Project's impacts to archaeological and paleontological resources would be less than significant. In addition, regarding human remains, the Project would comply with the City's standard condition of approval for the inadvertent discovery of human remains. Like the Project, the related projects are located in an urbanized area that has been previously disturbed. Each related project would be assessed for the potential to encounter archaeological and paleontological resources, as well as human remains, and if necessary, would implement mitigation measures similar to the Project. Further, like the Project, each of the related projects would be subject to regulatory requirements related to the inadvertent discovery of these resources. Therefore, cumulative impacts with respect to archaeological resources, paleontological resources, and human remains would be less than significant.

Energy

With respect to energy, although future development would result in the irreversible use of renewable and non-renewable energy resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP and SoCal Gas. As described previously, the LADOT VMT calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. Incorporation of USEPA MXD VMT reduction features applicable to the Project results in an approximately 31 percent reduction in overall VMT and resultant transportation fuel consumption. Based on the density and location of the related projects near transit, it is assumed that the related projects would result in similar reductions in VMT and

resultant transportation fuel consumption. Further, in accordance with current building codes and construction standards, each of the related projects would be required to comply with Title 24 and the City's Green Building Code. Therefore, cumulative impacts with respect to energy would be less than significant.

Geology and Soils

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, state, and federal regulations for seismic safety. Thus, cumulative impacts with respect to geology and soils would be less than significant.

Greenhouse Gas Emissions

As explained above, the analysis of a project's GHG emissions is inherently a cumulative analysis because climate change is a global issue and the emissions from individual projects are negligible in a global context. Given the Project's consistency with state, regional, and local plans adopted for the purpose of reducing GHG emissions, it is concluded that the Project's incremental contribution to cumulative GHG emissions and their effects on climate change would not be considerable. Therefore, cumulative impacts with respect to GHG emissions would be less than significant.

Hazards and Hazardous Materials

Due to their site-specific nature, impacts with respect to hazards and hazardous materials are also typically addressed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, like the Project, all related projects would be subject to local, state, and federal regulations pertaining to hazardous materials. Therefore, cumulative impacts with respect to hazards and hazardous materials would be less than significant.

Hydrology and Water Quality

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements, as well as NPDES, SWPPP, and SUSMP requirements, as applicable. It is anticipated that related projects would also be evaluated on an individual basis by the Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. In addition, there are no bodies of water, rivers, or streams in the Project area, and therefore, the Project and related

projects would not impede or redirect flood flows. Finally, the Project area (including the Project Site and the sites of the related projects) is approximately nine miles east of the Pacific Ocean and is not located within an area potentially affected by a tsunami. Thus, cumulative impacts with respect to hydrology and water quality would be less than significant.

Land Use and Planning

The Project area, including the Project Site and the sites of the related projects, is highly urbanized and is fully developed with existing buildings and roadways. The related projects generally consist of higher-density infill development including mixed-use, retail, restaurant, residential, and office uses, that would not divide an established community and instead responds to the need for housing, sources of employment, and retail uses, particularly near transit. The Project would not conflict with important local and regional goals and policies for the Los Angeles area (including those contained in the 2020-2045 RTP/SCS, the City's General Plan, and the Wilshire Community Plan), which would assist the City in achieving short- and long-term goals and objectives related to providing additional housing units, reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction in VMT. This is consistent with SCAG and other regional policies for promoting more intense uses near transit and providing a variety of housing options. As with the Project, the related projects would be required to comply with relevant land use policies and regulations, as well as zoning standards. As discussed above, the Project would not conflict with nor obstruct implementation of these regional and local plans, but instead, the Project would support the City and regional agencies in the implementation of these plans. Therefore, cumulative impacts related to land use would be less than significant.

Population and Housing

The Project area (including the Project Site and the sites of the related projects) is fully developed with residential, commercial, office, and entertainment uses. The Project, as well as the related projects, would be located in an area where new growth is planned and encouraged. Specifically, according to the 2020-2045 RTP/SCS, the Project area is located within a HQT A PGA, near transit (bus lines and the future Metro D Line), and is therefore consistent with the location and land use pattern for new growth encouraged by the RTP/SCS. The Project combined with the residential-related projects would not induce substantial growth. Instead, any residential projects would provide housing in support of the City's goal to increase the housing supply in the City. In addition, not all related projects include commercial uses and therefore would not contribute to employment growth. As described above, the Project would be within the growth forecasts contained in the 2020-2045 RTP/SCS and would provide new housing in a location where growth is planned encouraged. While the Project would not displace housing or people, it is possible that some of the related projects might displace existing housing units and the people residing in them. However, even if construction of replacement housing units were required elsewhere, such development would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects

could cause significant impacts. Therefore, cumulative impacts with respect to population and housing would be less than significant.

Public Services

Implementation of the Project and the related projects would result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

The increase in residents and employees as a result of the Project and the related projects could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

With respect to schools, parks/recreational facilities, and libraries, similar to the Project, the related projects could increase the demand for these services and facilities. However, like the Project, the applicants for the related projects would be required to pay fees as determined by applicable regulatory requirements. Specifically, in the case of schools, the applicants of the related projects would be required to pay school fees to the LAUSD, which would offset any potential impacts to schools associated with the related projects. Similarly, in the case of parks and recreational facilities, projects with residential components would be required by the LAMC to include open space and pay park in-lieu fees, as required, which would reduce the demand on parks and reducing the likelihood of deterioration of parks and recreational facilities. In addition, each related project would generate revenues to the City's General Fund that would help offset

the increase in demand for park and library facilities. Therefore, cumulative impacts with respect to schools, parks/recreational facilities, and libraries would be less than significant.

Transportation

With respect to transportation impacts, based on LADOT's TAG, a project that does not result in a significant VMT impact using the City's methodology, described in Section XVII (Transportation) of this Initial Study, are considered to align with long-term VMT and greenhouse gas reduction goals of both the City and regional SCAG transportation plans. Therefore, since the Project itself does not result in VMT impacts, it is also deemed to have a less than significant cumulative VMT impact.

Tribal Cultural Resources

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project would implement mitigation measures to ensure that its impacts with respect to tribal cultural resources are less than significant. Like the Project, the related projects are located in an urbanized area that has been previously disturbed. Each related project would be assessed for the potential to encounter tribal cultural resources, and if necessary, would implement mitigation measures similar to the Project. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

Utilities and Service Systems

Regarding cumulative utilities impacts, cumulative impacts with respect to energy and natural gas have been addressed above. With respect to cumulative water impacts, LADWP's 2020 UWMP anticipates a sustainable water supply for the City of Los Angeles for the next 25 years (through 2045) during normal, dry, and multiple dry year water conditions. This is based on demographic growth projections contained in SCAG's 2020-2045 RTP/SCS, which includes the Project and likely most of the related projects. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation would also reduce demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent, and all projects would be required to use fixtures that conserve water. In addition, any related projects meeting the size criteria under SB 610 would be required to prepare and receive LADWP approval of a water supply assessment. Therefore, Project impacts with respect to water would not be cumulatively considerable, and cumulative impacts would be less than significant.

With respect to cumulative wastewater impacts, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). As discussed above, the Project's proposed

wastewater generation is approximately 0.062 mgd, which is approximately 0.01 percent of the Hyperion Treatment Plant's design capacity, approximately 0.034 percent of the estimated future remaining available capacity in 2027 (the Project's buildout year) of 180.7 mgd of the Hyperion Treatment Plant. Therefore, given the Hyperion Treatment Plant's remaining available capacity of 180.7 mgd, the Hyperion Treatment Plant would have adequate capacity to accommodate the Project's 0.062 mgd in addition to wastewater generated by the related projects. Therefore, Project impacts with respect to wastewater would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the Class III landfills open to the City. Additionally, the demand for landfill capacity is continually evaluated through preparation of the Countywide Integrated Waste Management Plan annual reports, which assess future landfill disposal needs over a 15 year planning horizon. In future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

Wildfire

Regarding wildfire, the Project Site is located in an urbanized area and is not within a City-designated Very High Fire Hazard Severity Zone. Related projects would be located in the same urban environment as the Project and therefore it is unlikely that they would expose people or buildings to wildfire. Therefore, cumulative impacts with respect to wildfire would be less than significant.

Therefore, cumulative impacts with respect to these areas would be less than significant, and no mitigation measures are required. No further analysis of these topics in the EIR is required. However, as indicated above, the EIR will address cumulative impacts to cultural resources.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in the EIR.

7 PROJECT INCORPORATION OF MITIGATION MEASURES

The Project would incorporate the following mitigation measures from the City's Housing and Safety Element EIR:

Air Quality (Construction)

The Project would implement Mitigation Measure 4.2-3 from the Housing and Safety Element EIR, which is provided below, which would further ensure air quality impacts during construction are less than significant.

MM 4.2-3 Construction TAC Reduction Measures

For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with all mitigation measures in the mitigation plan.

Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

Nesting and Migratory Birds

The Project would incorporate the second and third paragraphs of Mitigation Measure 4.3-1(b), provided below, to ensure that impacts with respect to nesting and migratory birds are less than significant. The remaining portions of this mitigation measure are not applicable to the Project.

MM 4.3-1(b) Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the

identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist.

Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

Historic Resources

The Project would implement Mitigation Measure 4.4-1(a), provided below.

MM 4.4-1(a) Identification of Built-Environment Historic Resources

For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.

The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified.

If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history.

- The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.

Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j).

Archaeological Resources

The Project would implement Mitigation Measure 4.4-2, provided below, to ensure that impacts with respect to archaeological resources are less than significant.

MM 4.4-2 Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.

- A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).
- B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.
- C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival

research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.

- D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.
- E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.
- F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (<http://ohp.parks.ca.gov/pages/1054/files/armr.pdf>).
- G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.
- H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.
- I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring

shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

- J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.
- K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

Paleontological Resources

The Project would implement Mitigation Measures 4.5-1(a) through 4.5-1(d), provided below, to ensure that impacts with respect to paleontological resources are less than significant.

MM 4.5-1(a) Paleontological Procedures for Discretionary Projects

For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:

- Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County.
- If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment.

MM 4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring

If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.

MM 4.5-1(c) Construction Monitoring

If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial

five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.

MM 4.5-1(d) Fossil Discovery, Salvage, and Treatment

All discretionary projects shall be subject to the following mitigation measure:

Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines. Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).

Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.

The requirements in this mitigation measure shall be shown on plans.

Public Services (Police Protection)

The Project would implement Mitigation Measures 4.12-2(a) and 4.12-2(b), provided below, which would further ensure that impacts with respect to police protection are less than significant.

MM 4.12-2(a) Crime Prevention Unit Consultation

For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM 4.12-2(b) Security During Construction

During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site.

Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.

Tribal Cultural Resources

The Project would implement Mitigation Measures 4.15-1(a) and 4.15-1(b), provided below, to ensure that impacts with respect to tribal cultural resources are less than significant.

MM 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects

All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's

Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.

Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.

MM 4.15-1(b) Discovery of Potential Tribal Cultural Resources

In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately

documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.

The measure shall be shown on plans.