LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Ararat Homes Residential Care and Nursing Facility Project

Case Number: ENV-2021-0833-MND

Project Location: 15105 Mission Hills Road, Los Angeles, California 91345

Community Plan Area: Mission Hills

Council District: 7 - Rodriguez

Project Description: The proposed project would be an addition to the pre-existing Ararat Nursing Home located at 15105 Mission Hills Road. The proposed project would consist of a three-story lower campus with an underground parking garage and a four-story upper campus with both surface parking and an underground parking garage. The proposed building footprint of the lower campus would be 51,000 square feet (sf) for the skilled nursing facility and 96,150 sf for the assisted living (third floor) and memory care (first and second floors) facility. The skilled nursing in-patient building would provide 96 beds in 84 double rooms and 12 semi-private rooms, while the memory care and assisted living facility would provide 234 beds in 117 double rooms (39 rooms per floor). The upper campus would consist of a 61-unit apartment building and 40 townhouse units in four buildings. In particular, the building footprint of the upper campus would be 90,460 sf in size. In total, the proposed project would result in 101 new residential units (townhomes and apartments) and 330 new assisted living, memory care, or in-patient beds. The large unoccupied areas of the site would be used as open space and would be landscaped accordingly. A total of 299 parking spaces for the project will be provided in the underground parking garages and proposed small surface parking lot.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

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1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed Ararat Homes Residential Care and Nursing Facility Project ("project"). The proposed project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the project will not result in significant and unavoidable impacts on the environment, and that a Mitigated Negative Declaration can be adopted. This Initial Study and Mitigated Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (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 application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to CEQA, and the preparation of an Initial Study is required.

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 concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code § 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, § 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four 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 EVALUATION OF ENVIRONMENTAL IMPACTS

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	**ARARAT HOMES RESIDENTIAL CARE AND NURSING FACILITY PROJECT**
ENVIRONMENTAL CASE NO.	ENV-2021-0833-MND
RELATED CASES	

PROJECT LOCATION	**15105 MISSION HILLS ROAD**
COMMUNITY PLAN AREA	MISSION HILLS
GENERAL PLAN DESIGNATION	VERY LOW RESIDENTIAL
ZONING	RA-1 AND A2-1
COUNCIL DISTRICT	7

LEAD AGENCY	**City of Los Angeles, Department of City Planning**
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APPLICANT	**DERIK G. GHOOKASIAN** **ARARAT HOMES, INC.**
ADDRESS	7660 WOODWAY DR. SUITE 400 HOUSTON, TX 77063
PHONE NUMBER	(818) 365-3000 EXT. 247

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- ☐ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☒ Cultural Resources
- ☐ Energy
- ☒ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☒ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☐ 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.

Correy Kitchens	City Planning Associate
PRINTED NAME	**TITLE**
Correy Kitchens	February 22, 2024
SIGNATURE	**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 that 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 proposed project would be an addition to the pre-existing Ararat Nursing Home located at 15105 Mission Hills Road. The proposed project would consist of a three-story lower campus with an underground parking garage and a four-story upper campus with both surface parking and an underground level parking garage. The building footprint of the lower campus would be 51,000 sf for the skilled nursing facility and 96,150 sf for the assisted living (third floor) and memory care (first and second floor) facility. The skilled nursing in-patient building would provide 96 beds in 84 double rooms and 12 semi-private rooms, while the assisted living and memory care facility would provide 234 beds in 117 double rooms (39 rooms per floor). The upper campus would consist of a 61-unit apartment building and 40 townhouse units in four buildings. The building footprint of the upper campus would be 90,460 sf. In total, the proposed project would result in 101 new residential units (townhomes and apartments) and 330 new assisted living, memory care, and in-patient beds. The large unoccupied areas of the site would be used as open space and landscaped accordingly.

A total of 299 parking spaces for the project will be provided in the underground parking garages and small surface parking lot. Export of approximately 60,000 cubic yards of earth materials will be required. To achieve the proposed project, the applicant is requesting the following land use entitlements:

- **Eldercare Unified Permit Process (LAMC Section 14.3.1):** to allow 1) eldercare facility in the RA and A2 zones, 101-unit senior independent living (inclusive of 50 senior housing units, 31 affordable senior housing units and 20 special needs senior housing units), 234-bed assisted living, (inclusive of 156-bed memory care) and 96-bed skilled nursing.

- **Zoning Administrator Adjustment (LAMC Section 12.21.C8(c)):** to allow an 18-foot front yard setback in lieu of 20% of the depth of the lot or a maximum of 25 feet as required per LAMC Section 12.07 C.1 and LAMC Section 12.06 C.1.

- **Zoning Administrator Determination (LAMC Section 12.24 X.26):** to allow LAMC 12.21C.8(c) 1) two separate retaining walls with varying heights up to 20 feet.

- **Site Plan Review (LAMC Section 16.05):** to allow development with more than 50 dwelling units.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The project is proposed on an approximately 11.35-acre site located at 15105 Mission Hills Road (project site) within the Mission Hills Community Plan (“Community Plan”)

area of the City of Los Angeles ("City"). The project site is located approximately 0.2-miles southwest of the I-5 interchange and approximately 0.2-miles southeast of the I-405 interchange. Figure 1 shows the location of the project site in the Mission Hills neighborhood and in the City of Los Angeles. Figure 2 shows the boundaries of the project site.

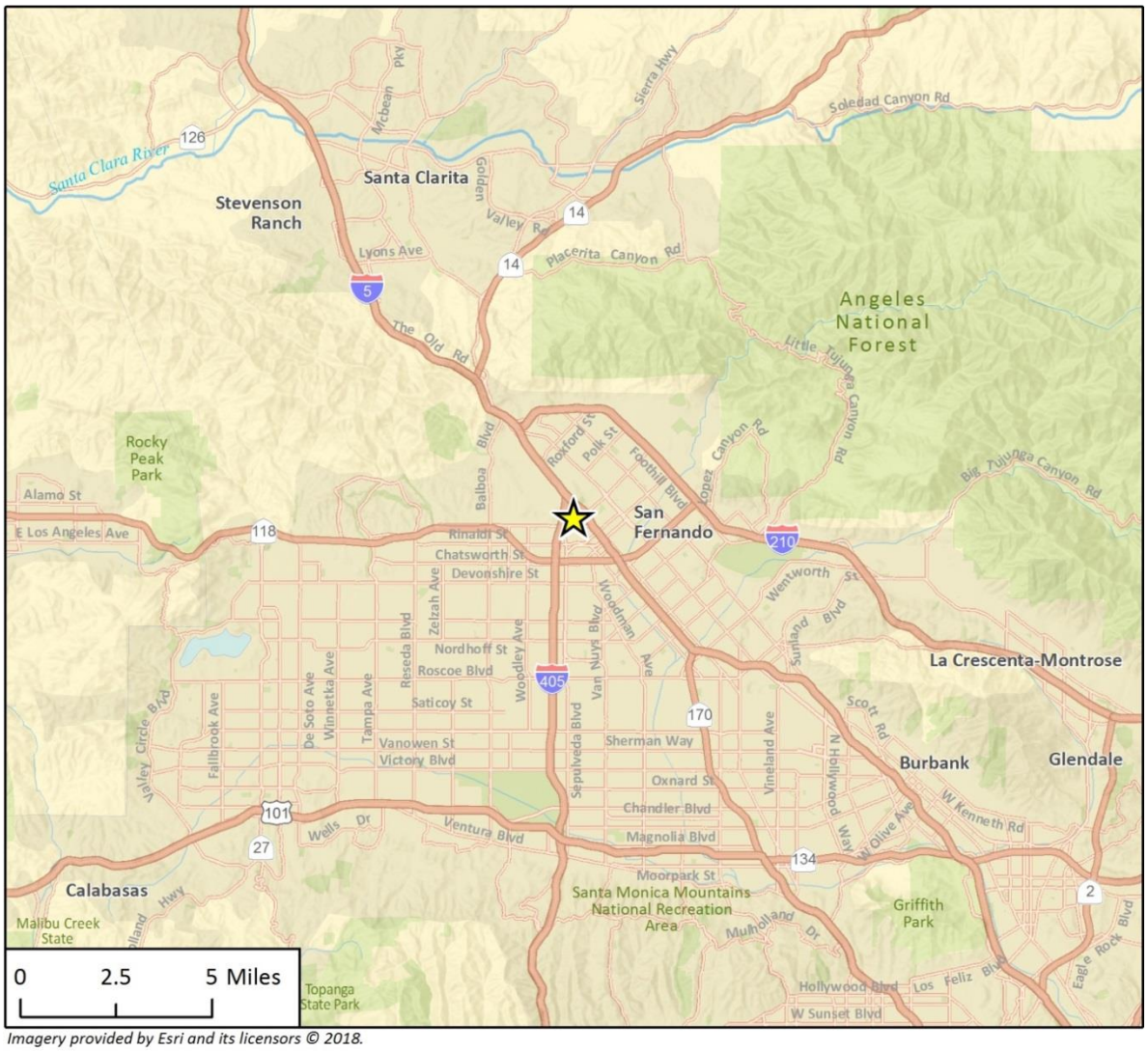
3.2.2 Existing Conditions

The project site consists of four parcels (Assessor's Parcel Numbers [APN] 2664-022-019, 2664-022-018, 2664-022-008, and 2664-022-009). APN 2664-022-019 is approximately 1.07 acres and contains a single-family residence (1,847 sf). APN 2664-022-018 is approximately 6.64 acres and contains a single-family residence (2,675 sf). APN 2664-022-008 is approximately 2.45 acres and does not contain structures. APN 2664-022-009 is approximately 1.19 acres and does not contain structures. The undeveloped portions of the site contain landscaping and undisturbed vegetation. There are currently 197 trees located on site, including one Coast Live Oak (sp. *Quercus agrifolia*), two Valley Oaks (sp. *Quercus lobata*), and one Sycamore (sp. *Platanus racemosa*) that are protected tree species. The other 193 trees would be removed as part of the project. All existing structures would be removed to allow for development of the project.

The entire project site is designated for Very Low Residential uses by the Community Plan. The north portion of the project site (i.e., APN 2664-022-018 and APN 2664-022-019) has a corresponding zone of RA-1, while the south portion of the project site (i.e., APN 2664-022-008 and APN 2664-022-009) has a corresponding zone of A2-1.

The LAMC establishes the zoning for the north portion of the project site as RA-1 (Suburban Agriculture, Height District 1) and the south portion of the project site as A2-1 (Agriculture, Height District 1). The RA zone permits limited agricultural uses, one-family dwellings, and home occupations. Height District No. 1, in conjunction with the RA zone, establishes a maximum height of 36-feet for roofs with slopes of greater than 25 percent and 30-feet for roofs with slopes of less than 25 percent. LAMC Section 12.07 C.5 establishes a maximum residential floor area in the RA zone of 20 percent of the lot area if the lot is greater than 20,000 square-feet or 5,000 square-feet, whichever is greater. The A2 zone permits A1 uses, which are single-family dwellings, parks, playgrounds, community centers, golf courses, and agricultural uses. Height District No. 1, in conjunction with the A2 zone, establishes a maximum height of 45 feet and a maximum Floor/Area Ratio (FAR) of 3:1.

Figure 1 Regional Location



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Project Location

N

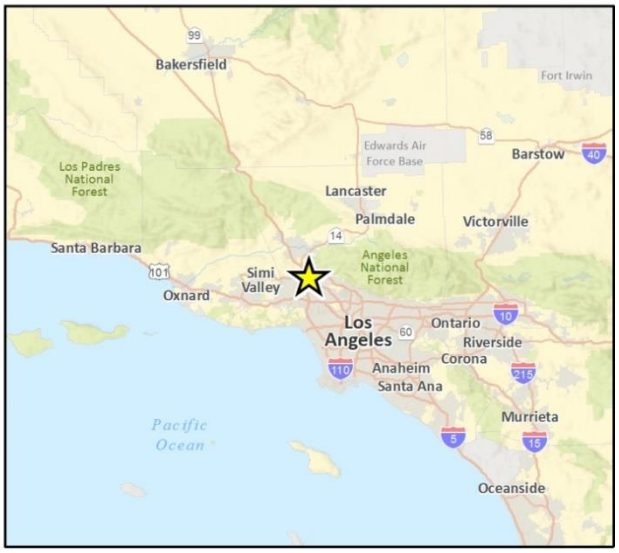

Figure 2 Project Location

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3.2.3 Surrounding Land Uses

The site is bounded by Mission Hills Road to the south, with Bishop Alemany High School baseball/softball/soccer fields and track and a self-storage facility south of Mission Road, Eden Memorial Park to the west, an assisted living facility and museum to the east, and two single-family residences to the north. Table 1 lists the surrounding land uses with general plan and zoning designations, as well as existing uses.

Table 1 Surrounding Land Uses

	General Plan Designation	Zoning District	Existing Uses
Project Site	Very Low Residential	Suburban Agriculture (RA-1) Agriculture (A2-1)	Single-family residences
North	Very Low Residential	Agriculture (A2-1)	Two single-family residences
South	Very Low Residential	Agriculture (A2-1)	Bishop Alemany High School baseball/softball fields, soccer field, and track; self-storage facility
East	Very Low Residential	Agriculture (A2-1)	Ararat Home of Los Angeles assisted living facility; Ararat-Eskijian Museum
West	Very Low Residential	Agriculture (A2-1) Residential Estate (RE20-1)	Eden Memorial Park

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As noted above, the project would be an addition to the existing Ararat Nursing Home located at 15105 Mission Hills Road. Specifically, an eldercare facility with two independent campuses (the “Lower Campus” and “Upper Campus”) would be constructed.

Lower Campus

On the Lower Campus, a 330-bed complex with two separate buildings and one level of subterranean parking would be constructed. The Lower Campus would contain a three-story building with memory care and assisted living units (234 total beds) and a three-story building with skilled nursing in-patient units (96 total beds). The subterranean parking structure would contain approximately 151 vehicular parking spaces as well as two kitchens, offices, laundry areas, and storage and utility rooms. An additional 10 drop-off vehicle spaces would be provided at ground level. The first floor of the memory care and assisted living building would contain residential units, support function areas with dining areas, offices, and a wellness education center on the deck connected to the memory care and assisted living building. The second and

third floors of the memory care and assisted living building would contain residential units, support functions areas, and multi-purpose rooms.

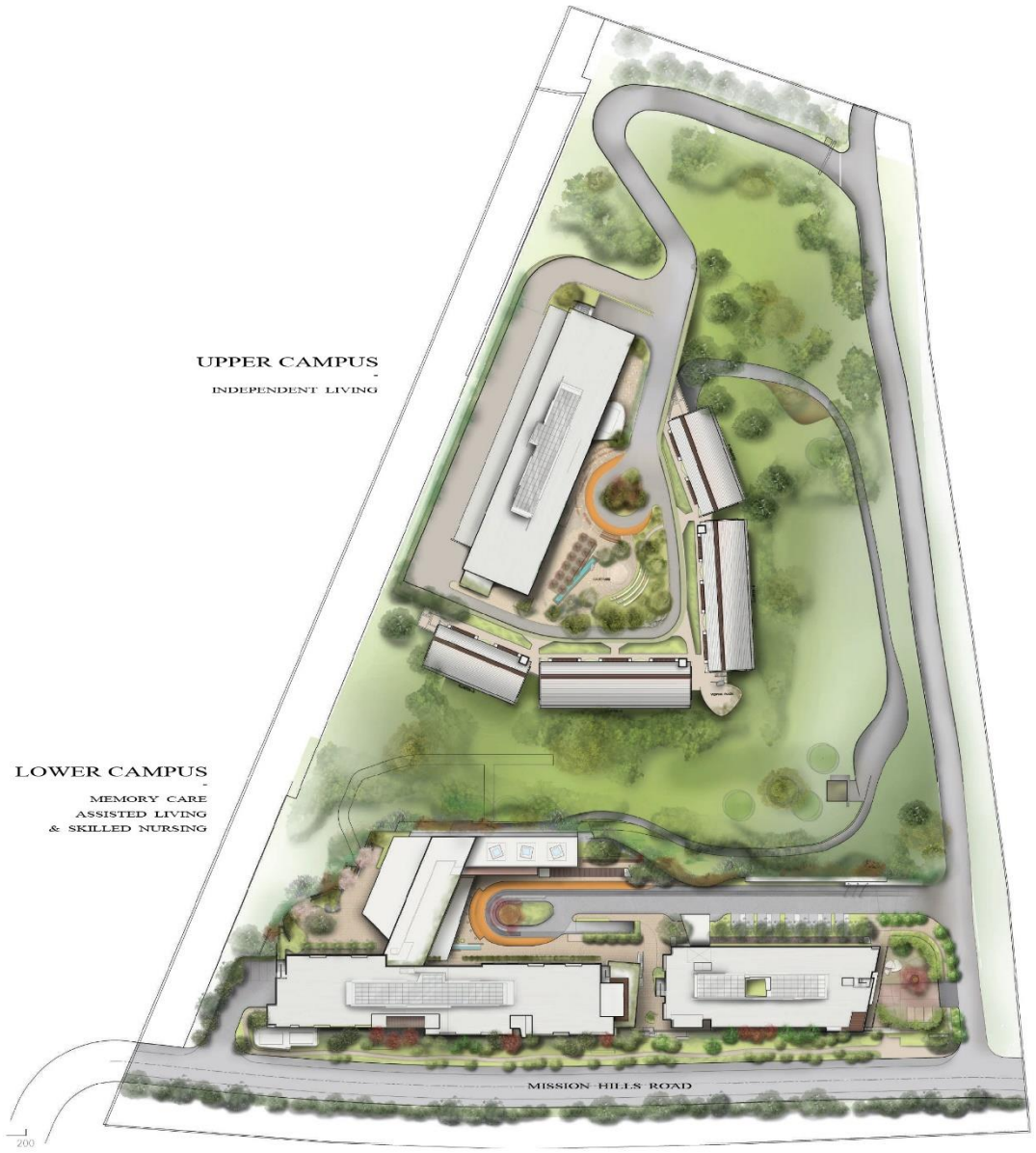
The first floor of the skilled nursing building would contain residential units, a dining area, patio, support functions areas, and an office. The second and third floors of the skilled nursing building would contain residential units, support functions, and a dining area. Buildings on the Lower Campus would contain bedrooms, community activity areas, dining areas, and physical therapy areas. The roofs of both buildings would contain solar panels and the deck would have a rooftop garden. The Lower Campus would contain a total square footage of approximately 214,500 square-feet (including the 68,000-sf subterranean parking garage). The memory care and assisted living building would have a height of 53-feet to the roof plus an additional four-feet to the top of the mechanical penthouse screen above the roof for a maximum height of 57-feet. The skilled nursing facility would have a height of 51-feet to the roof plus an additional four-feet to the top of the mechanical penthouse screen above the roof for a maximum height of 55-feet.

Upper Campus

On the Upper Campus, an independent living complex with 40 townhomes and 61 apartment units over one level of subterranean parking would be constructed. The townhomes would be contained in four separate two-story buildings with a total building footprint of approximately 54,000 square-feet, and the apartments would be contained in a single four-story building with a building footprint of approximately 61,000 square-feet. The 40,000-sf subterranean parking garage would contain 111 parking spaces. Parking would also be provided in a surface parking lot with 27 parking spaces. The apartment building would contain residential units and amenities, including a dining room, kitchen, administrative offices, and community areas, such as a lounge/internet bar, gift shop, business center, beauty salon, wellness center, and cinema room. The Upper Campus would contain a total building area of approximately 155,000 square-feet (including the subterranean parking garage). The first level of the apartment building consists of residential units and amenities including a movie theater, dining areas, a lounge area, a beauty salon, a wellness center, offices, a gift shop, and a mail room. The second and third levels of the apartment consists of residential units and the third level of the apartment contains a viewing deck. The fourth level (roof) of the apartment consists of solar panels. Outdoor spaces on the Upper Campus would include a pool and rooftop deck associated with the apartment building, a ground-level viewing plaza, a courtyard, and an amphitheater. The apartment building would have a height of 53-feet to the roof plus an additional two-feet to the top of the mechanical penthouse screen above the roof for a maximum height of 55-feet. The townhomes would have a maximum height of 27-feet.

Figure 3 shows the proposed overall site plan and Figure 4 through Figure 6 show conceptual elevation renderings of the proposed project. Table 2 provides a summary of the proposed project building sizes and landscaping.

Figure 3 Proposed Site Plan



Source: Zakian Woo Architects, 2023

Figure 4 Proposed Lower Campus Elevations

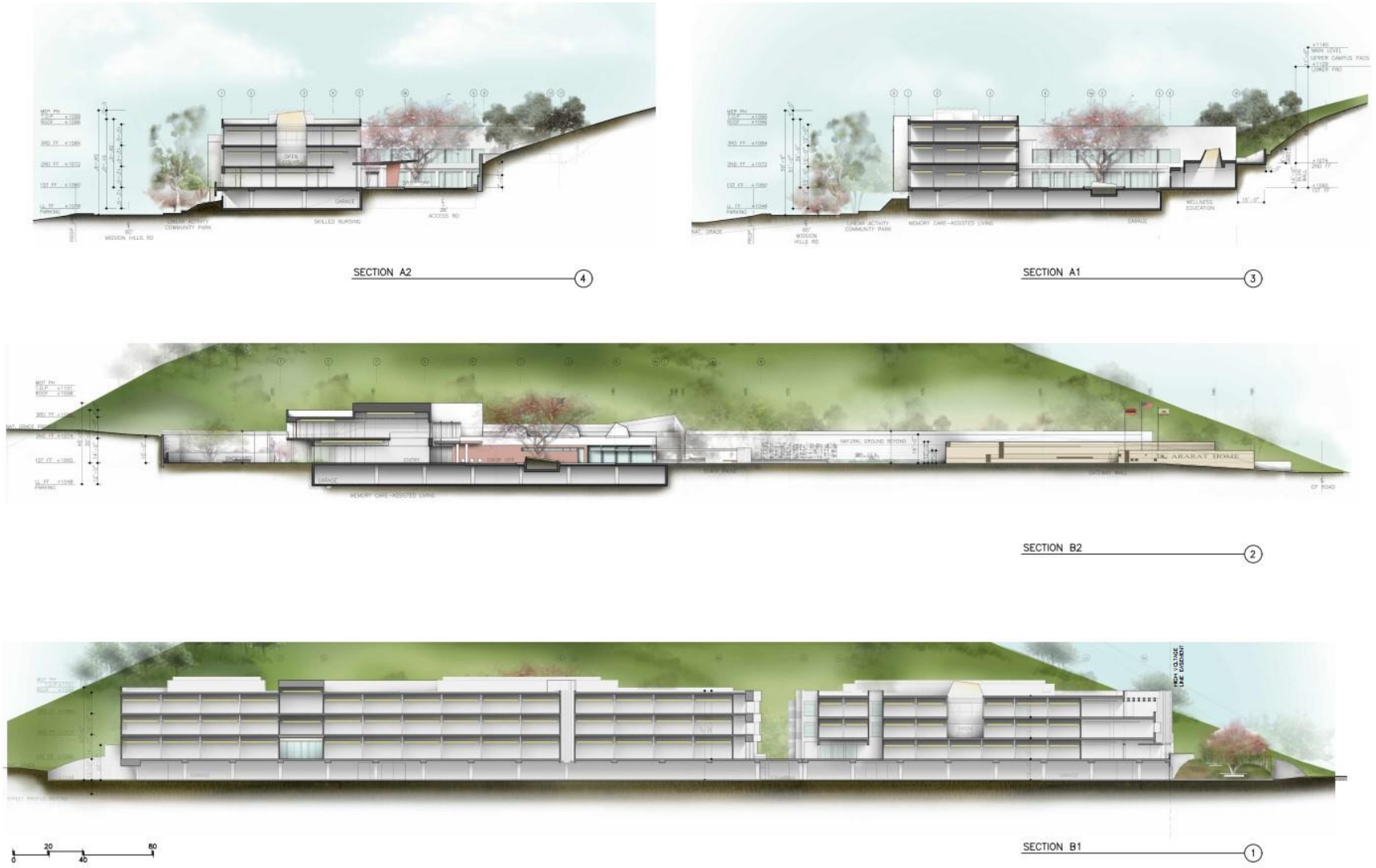


Figure 5 Proposed Upper Campus South and West Elevations

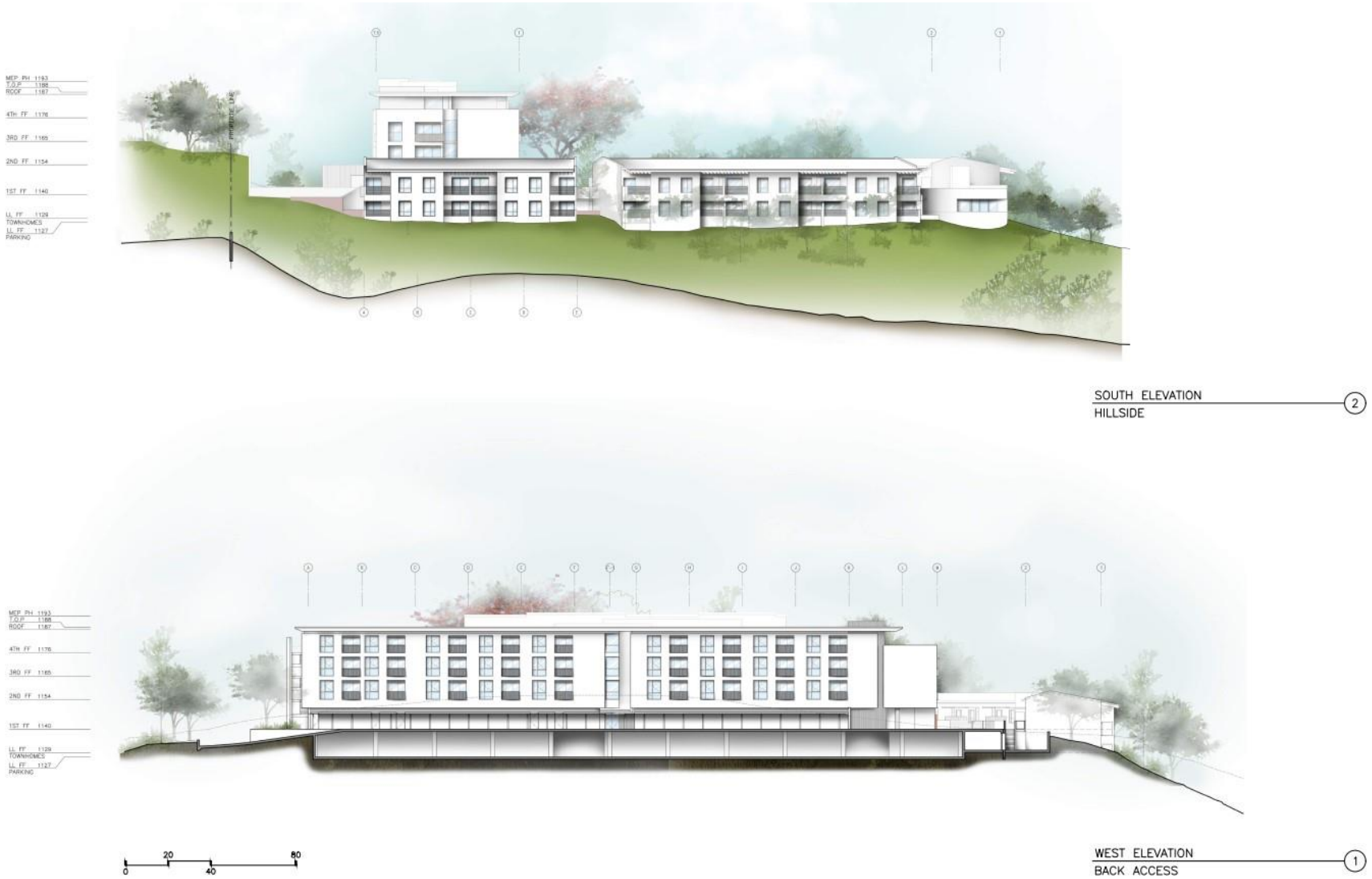


Figure 6 Proposed Upper Campus East and North Elevations

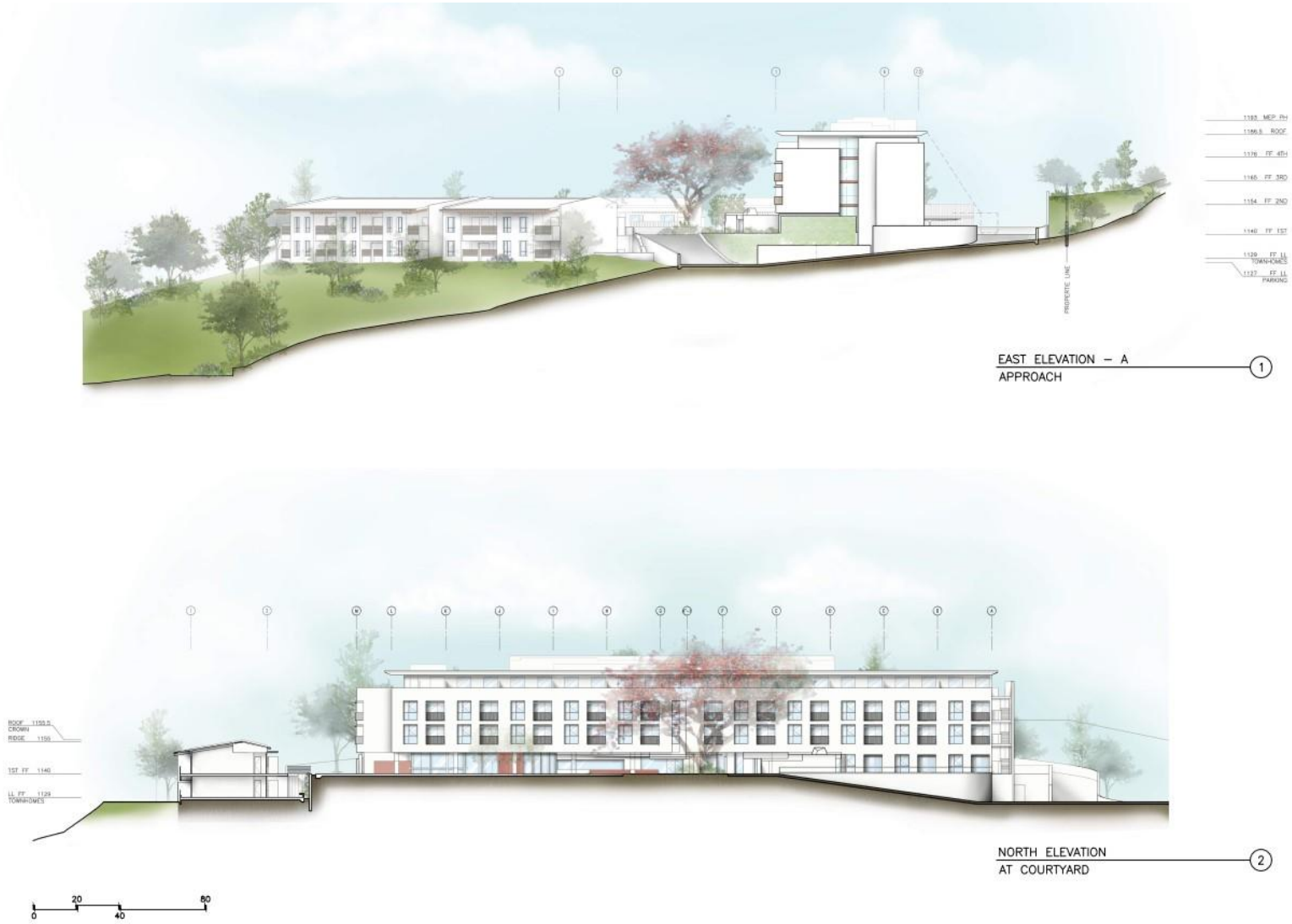


Table 2 Project Summary

Building Area	
Total Acreage	494,620 sf (11.35 acres)
Total Building Footprint	370,500 sf
FAR	0.75
Upper Campus	
Total Building Area	155,000 sf
Subterranean Parking	40,000 sf
Apartments	61,000 sf
Townhouses	54,000 sf
Residential Units	101 units
Apartments	61 units
Townhomes	40 units
Height	Apartment – 53 feet (at the roof); 55 (at the top of the mechanical penthouse screen) Townhomes – 27 feet
Parking	138 (111 subterranean spaces + 27 surface spaces)
Lower Campus	
Total Building Area	214,500 sf
Subterranean Parking and Other Uses	68,000 sf
Memory Care and Assisted Living	95,500 sf
Skilled Nursing Facility	51,000 sf
Beds	330 beds
Height	Memory Care and Assisted Living – 53 feet (at the roof); 57 feet (at the top of the mechanical penthouse screen) Skilled Nursing Facility – 51 feet (at the roof); 55 feet (at the top of the mechanical penthouse screen)
Parking	161 (151 subterranean spaces + 10 drop-off plaza level spaces)
Bicycle Parking	
Short and Long Term	75 stalls
Open Space and Landscaping	
Upper Campus	27,790 sf (4.9% site coverage)
Hillside Area	245,278 sf (43.5% site coverage)
Lower Campus	62,094 sf (11.0% site coverage)
Total	**335,162 sf (59.4% site coverage)**

3.3.2 Design and Architecture

Project buildings would be surfaced with painted stucco, comprised of different tones of taupe and light red/rust, in addition to aluminum window frames, replicated wood railings, metal grills, and taupe ceramic panels. Windows would be double paned and glazed. Visual illustrations of the buildings are shown in the elevation profiles in Figure 7 through Figure 8.

3.3.3 Open Space and Landscaping

The Upper Campus includes private open space at the lower level near the townhomes, consisting of gardens using perennials, shrubs, groundcovers, and turf; the private courtyard would contain benches, tables, a water feature, and landscaping; and in perimeter areas near the apartment building. The hillside area would also be retained as open space, located between the Upper Campus and Lower Campus, and adjacent to the access road to the Upper Campus. The Upper and Lower Campuses would be connected by a walking path. The hillside would be revegetated with a majority of California native plant species and would be improved with erosion control. The Lower Campus includes private open space in the private courtyard area west of the memory care and assisted living building, including benches, tables, and landscaping; private open space in the interior and exterior courtyard west of the memory care and assisted living building, including benches, tables, a water feature, and landscaping; and common open space in the form of a meandering path, exercise stations, benches, and landscaping along the southern elevation of the Lower Campus and access road.

The project would be required to adhere to the City's water efficient landscape ordinance. Per the Tree Report prepared for the project (included as Appendix C2 in this IS-MND), 197 trees currently exist on site. The project would remove four protected trees from the upper campus, including California sycamore (*Platanus racemosa*), two valley oaks (*Quercus lobata*), and one California live oak (*Quercus agrifolia*). These trees would be replaced at a ratio of 4:1 in conformance with the City's Protected Tree Ordinance (Ordinance No. 177,404), as discussed below. The other 193 on-site trees would all be removed to accommodate the development of the proposed project. The landscaping plan includes the planting of 374 various tree species throughout the site.

3.3.4 Access, Circulation, and Parking

Vehicular access to the project site would be provided via two driveways on Mission Hills Road. The western access driveway would provide access to the subterranean parking structure on the Lower Campus. The eastern access driveway would provide access to the drop-off roundabout on the Lower Campus and to the subterranean parking structure, surface parking lot, and drop-off roundabout on the Upper Campus.

Figure 7 Architectural Rendering – Lower Campus

BACKYARD COVERED PORCH 4

BACKYARD VIEW TO THE UPPER CAMPUS 2

SNF ENTRANCE AND ACCESS SPINE 3

ASSISTED LIVING, MEMORY CARE AND WELLNESS CENTER 1

Figure 8 Architectural Rendering – Upper Campus

ACCESS ROAD AND GARAGE ENTRANCE 4

APARTMENT BUILDING DOCK AND PRIVATE ROAD 2

TOWNHOUSES, APARTMENT BUILDING AND VIEW POINT 3

UPPER CAMPUS ROUND ABOUT DROP–OFF 1

3.3.5 Sustainability Features

The project would comply with the California Green Building Standards Code (CALGreen). The project is also subject to Building Code Development and Adoption under Title 24 standards that set energy and water efficiency. Additionally, balconies on both campuses provide shading for apartments and guest rooms, which reduces the buildings heat gain. The main entrance to individual buildings provides shaded access and heat protection to reduce air conditioning energy usage. Bioswales and bioretention planters would be used as stormwater retention devices.

3.3.6 Anticipated Construction Schedule

Site construction activities for the project are expected to commence in January 2025 with occupancy by November of 2031. Construction of the project would be completed in three separate phases, which are described below.

Phase 1

The first phase consists of site preparation, grading, building construction, and paving for the memory care/assisted living facility, located at the southern end of the site. Phase 1 activities are expected to occur over a 25-month period beginning in January 2025 and ending in February 2027.

Phase 2

Phase 2 consists of demolition, site preparation, grading, building construction, and paving for the independent living complex (townhomes and apartment building). Phase 2 activities are expected to occur over a 25-month period beginning in November 2026 and ending in December 2028.

Phase 3

Phase 3 consists of site preparation, grading, building construction, and paving for the skilled nursing facility. Phase 3 activities are expected to occur over a 37-month period beginning in September 2028 and ending in December 2031.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the project. This Mitigated Negative Declaration will analyze impacts associated with the project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the project. The discretionary entitlements, reviews, permits and approvals required to implement the project include, but are not necessarily limited to, the following:

- **Eldercare Unified Permit Process (LAMC Section 14.3.1):** to allow 1) Eldercare facility in the RA and A2 zones, 101-unit Senior Independent Living (inclusive of 50 senior

housing units, 31 affordable senior housing units and 20 special needs senior housing units), 234-bed Assisted Living, (inclusive of 156-bed Memory Care) and 96-bed Skilled Nursing.

- **Zoning Administrator Adjustment (LAMC Section 12.21.C8(c)):** to allow an 18-foot front yard setback in lieu of 20% of the depth of the lot or a maximum of 25 feet as required per LAMC Section 12.07 C.1 and LAMC Section 12.06 C.1.

- **Zoning Administrator Determination (LAMC Section 12.24 X.26):** to allow LAMC 12.21C.8(c) 1) two separate retaining walls with varying heights up to 20 feet.

- **Site Plan Review (LAMC Section 16.05):** to allow development with more than 50 dwelling units.

- **Engineering Review and Approval:** A permit from the Bureau of Engineering (BOE) must be obtained for construction in any property, street or other right of way owned by, to be owned by, or under the control of the City. Such improvements may include, but are not limited to sidewalks, curbs, gutters, pavement, grading, sewers, storm drains, retaining walls, trees and tree wells, culverts, traffic signals, and street lights. Construction A-Permits are issued for minor work in the right-of-way, while B-Permits are issued for more extensive public works improvements. S-Permits are issued for new sewer and storm sewer connections. Plans will be subject to the review and approval of BOE for three phases of plan check.
- **Stormwater Review and Approval:** The proposed project would be subject to the review and approval of the Bureau of Sanitation (BOS). Project sites greater than 500 square-feet are required to comply with the Los Angeles Low Impact Development (LID) ordinance. Stormwater mitigation measures must be incorporated into design plans and submitted to the City for review and approval.
- **Street Lighting Review and Approval:** Should a B-Permit be required for the project due to additional lighting improvements or relocation, street lighting plans will be subject to the review and approval of the Bureau of Street Lighting (BSL).
- **Fire:** Plans would be subject to the review and approval of the Los Angeles Fire Department (LAFD) for fire and life safety plan review. LAFD would review fire truck access, fire department connection location, and hydrant pressure requirement for the project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	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?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No Impact. A significant impact may occur if the project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the L.A. CEQA Thresholds Guide, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

The Conservation Element of the City of Los Angeles General Plan (General Plan) describes scenic vistas as the panoramic public view access to natural features, including views of the ocean, striking natural terrain, or unique urban or historic features (City of Los Angeles 2001). None of these elements are visible from the project site. The proposed project would likely be visible from Eden Memorial Park but would not block mountain views to the north or views of the San Fernando Valley to the south. Therefore, no impact to scenic vistas would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less than Significant Impact. Based on the L.A. CEQA Thresholds Guide, a significant impact would occur if scenic resources would be damaged and/or removed by development of a project. The project site is not located along a scenic highway (Caltrans 2019). The closest State scenic highway to the project site is State Route 2, located approximately 15.2 miles southwest of the project site (Caltrans 2019). According to the project's Cultural Resource Assessment (Appendix D) prepared by Rincon, there are no historic buildings located on the project site (Rincon 2023). All 197 on-site trees would be removed from the project site, but 374 new trees would be planted throughout the project site. Therefore, impacts to scenic resources would be less than significant.

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. Based on the L.A. CEQA Thresholds Guide, a significant impact would occur if the proposed project would result in the removal of one or more features that contribute to the valued aesthetic character or impact of the neighborhood, community, or localized area, or if the proposed project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site. The project site is currently a 11.35-acre site occupied by two residences that would be demolished to construct the four-story upper campus. The construction of the four-story upper campus and three-story lower campus would increase the massing on the project site but would be visually consistent with surrounding uses.

According to the L.A. CEQA Thresholds Guide, a significant impact would occur if shadow-sensitive uses, such as routinely usable outdoor spaces associated with residential or recreational land uses, would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. between late October and early April, or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. between early April and late October. The upper and lower campuses would have a combined site area of 370,500 sf, which is only 75% of the 11.35-acre project site. Thus, a majority of the shading associated with the proposed project would occur on the project site. Therefore, impacts to the existing visual character and quality of the site and its surrounds would be less than significant.

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

Less than Significant Impact. Based on the L.A. CEQA Thresholds Guide, the determination of whether the proposed project results in a significant nighttime illumination impact shall be made considering the following factors:

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

The proposed project would construct a new three-story lower campus, and a new four-story upper campus. The lower and upper campus would both include indoor lighting, as well as exterior lighting for security and outdoor common areas. The proposed project would also utilize reflective materials, such as glass surfaces, in its balcony doors and resident windows, which could create glare during daylight hours. In addition, the proposed project would generate new vehicle traffic to and from the project site that would contribute light from vehicle headlamps and glare from vehicle surfaces and windows.

New sources of light and glare created by the project would not adversely affect day or nighttime views in the area. The project site is in a relatively low-density portion of the Mission Hills community, surrounded by Eden Memorial Park to the west, Bishop Alemany High School baseball/softball/soccer fields to the south, and the existing Ararat Homes campus to the east. The project site is located approximately 0.2-mile southwest of the I-5 interchange and approximately 0.2-mile southeast of the I-405 interchange, which generate high levels of nighttime lighting. A majority of the parking for the proposed project would be located underground or indoors. Nighttime lighting associated with the parking areas would be minimal. Residents would be located on floors 1 through 3 of the lower campus and on floors 1 through 4 of the upper campus. Thus, most of the light and glare from the proposed project would occur at or above the surrounding uses. Nighttime exterior lighting would also occur at similar illumination levels to the exterior lighting of the neighboring Ararat Homes campus, Eden Memorial Park, and Bishop Alemany High School baseball/softball/soccer fields.

Furthermore, the proposed project would comply with California Green Building Standards Code (CALGreen) Section 5.106.8, which sets requirements for outdoor lighting to reduce light pollution, including allowable backlight, uplight, and glare (BUG) ratings on outdoor lights. In addition, the project would be subject to the City's Green Building Code (Chapter IX, Article 9), which includes provisions for light and glare reduction (LAMC Section 99.05.106.8). Therefore, impacts from daytime and nighttime glare would be less than significant.

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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

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

No Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project were to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The California Department of Conservation's Important Farmland Finder shows that the project site is not within an area of "prime farmland" (California

Department of Conservation 2022a). The project would not convert any farmland to non-agricultural use. Therefore, there would be no impact.

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

No Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project were to conflict with existing zoning for agricultural use or a Williamson Act contract. The project site is not under any Williamson Act contract (California Department of Conservation 2017). The project would not involve any development that could result in the conversion of farmland to non-agricultural uses. Therefore, there would be no impact.

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. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project conflicts with existing zoning or rezoning. Neither the project site nor the surrounding parcels are zoned for forest land or timberland. There is no timberland production at the project site. Therefore, the project would have no impact on such resources.

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

No Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project resulted in the loss or conversion of forest land or timberland. Neither the project site nor the surrounding parcels are zoned for forest land. The project would have no impact on such resources.

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?

Less than Significant Impact. The project site does contain agriculturally zoned land (RA-1, Suburban Agriculture and A2-1, Agriculture), but does not contain any forest land, or timberland, and is not under any Williamson Act contract (City of Los Angeles 2023a, California Department of Conservation 2017). The project site is designated by the City of Los Angeles's General Plan as Very Low Residential, and most of the surrounding properties are zoned for agricultural uses. However, the majority of the surrounding parcels are not developed with agricultural uses, and the project site itself is also not developed with agricultural uses. Because the project would not convert land that is currently in agricultural use, the project would not influence adjacent agricultural land conversions to non-agricultural uses. The proposed project would have a less than significant impact on farmland, timberland, or forest land.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_X), particulate matter with diameters of ten microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone (O_3), which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_X. Secondary pollutants include oxidants, O_3, and sulfate and nitrate particulates (smog). Air pollutants can be generated by the natural environment, such as when high winds suspend fine dust particles.

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this IS-MND.

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air Quality Standards and Attainment

The project site is located in the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. SCAB is under the authority of the South Coast Air Quality Management District (SCAQMD).

Depending on whether the standards are met or exceeded, the SCAB is classified as being in "attainment" or "nonattainment." In areas designated as nonattainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants. The human health associated with these criteria pollutants, as presented in Table 3, already occurs in those areas as part of the environmental baseline condition.

Table 3 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone (O_3)	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	Reduces oxygen delivery leading to: (1) aggravation of chest pain (angina pectoris) and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO_2)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.

Sulfur dioxide (SO_2)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.
Lead	(1) Short-term overexposures: lead poisoning can cause (a) anemia, (b) weakness, (c) kidney damage, and (d) brain damage; (2) long-term exposures: long-term exposure to lead increases risk for (a) high blood pressure, (b) heart disease, (c) kidney failure, and (d) reduced fertility.

Source: USEPA 2023

As the local air quality management agency, SCAQMD, must monitor air pollutant levels to ensure that the NAAQS and CAAQS are met. If they are not met, the SCAQMD must develop strategies for their region to meet the standards. The strategies to achieve attainment status are included as part of the Air Quality Management Plan (AQMP). The SCAB is in nonattainment for O_3 and $PM_{2.5}$ federal standards. Also, the SCAB is in nonattainment for the state standard for PM_{10} and designated unclassifiable or in attainment for all other federal and state standards. The Los Angeles County portion of the SCAB is also designated nonattainment for lead (CARB 2022). The proposed project is located in Los Angeles County that is within the SCAB and under the jurisdiction of the SCAQMD. This nonattainment status results from several factors. These factors include the combination of emissions from a large urban area, the regional meteorological conditions adverse to the dispersion of air pollution emissions, and the mountainous terrain surrounding the SCAB that traps pollutants (SCAQMD 2022). The attainment status for Los Angeles County portion of SCAB is included in Table 4.

Table 4 Attainment Status of Criteria Pollutants in Los Angeles County of SCAB

Pollutant	State Designation	Federal Designation
O_3	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Nonattainment

Sources: CARB 2022

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The monitoring stations aim to measure ambient concentrations of pollutants and determine whether ambient air quality meets California and federal standards. SCAQMD has divided the air basin into general forecast and air monitoring areas. Current air quality information is obtained from the same or closest monitoring area (or source receptor area [SRA]) where the project is located. The project site is located in SRA 7. The closest monitoring station to the project site is the Reseda monitoring station (located at 18330 Gault Street, Reseda), approximately seven miles southwest of the project site in SRA-6. The closest monitoring station in SRA 7 is the North Hollywood monitoring station (located at 10659 W Delano St, North Hollywood). Insufficient data were obtained from this monitoring station to determine criteria pollutant concentrations; therefore, Reseda monitoring station is used in this analysis. The Reseda monitoring station collects 8-hour O_3, 1-hour O_3, NO_2, CO, and $PM_{2.5}$ measurements. The closest monitoring station with PM_{10} measurements is the Santa Clarita monitoring station (22223 Placerita Canyon Road, Santa Clarita), approximately 8 miles northwest of the project site. Table 5 indicates the number of days each federal and state standard exceeded at the Reseda and Santa Clarita monitoring stations. As shown therein, 2020, 2021, and 2022 O_3 measurements exceeded the federal and state O_3 standards. $PM_{2.5}$ measurements exceeded the federal $PM_{2.5}$ standard exceedances in 2020 and 2021. No other criteria pollutants exceeded the state or federal standards at these monitoring stations. SO_2 is not included in the table below since the region no longer monitors the pollutant.

Table 5 Ambient Air Quality at the Nearest Monitoring Station

Pollutant	2020	2021	2022
8 Hour Ozone (ppm), 8-Hour Average[1]	0.115	0.083	0.096
Number of Days of state exceedances (>0.070 ppm)	62	31	23
Number of days of federal exceedances (>0.070 ppm)	62	31	23
Ozone (ppm), Worst Hour[1]	0.142	0.110	0.110
Number of days of state exceedances (>0.09 ppm)	33	4	7
Carbon Monoxide (ppm) – Worst Hour[1]	2.0	2.6	2.2
Number of days of state exceedances (>20.0 ppm)	0	0	0
Nitrogen Dioxide (ppm) - Worst Hour[1]	0.049	0.054	0.055
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
Particulate Matter 10 microns or less, μg/m^3, Worst 24 Hours[2]	67.8	47.1	36.9
Number of days of state exceedances (>50 μg/m^3)	0	0	0
Number of days above federal standard (>150 μg/m^3)	0	0	0
Particulate Matter 2.5 microns or less, μg/m^3, Worst 24 Hours[1]	73.8	55.5	20.5
Number of days above federal standard (>35 μg/m^3)	3	3	0

[1]Measurements were taken from Reseda monitoring station

[2]Measurements were taken from Santa Clarita monitoring station

Source: CARB 2023a, CARB 2023b.

Air Quality Management

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs that serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions to meet the 2037 ozone standard deadline for the non-Coachella Valley portion of the South Coast Air Basin, as NO_X plays a critical role in the creation of ozone. The 2022 AQMP includes strategies to ensure the SCAQMD does its part to further the district's ability to meet the 2015 federal ozone standards (SCAQMD 2022). The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technology, best management practices, co-benefits from existing programs, incentives, and other Clean Air Act measures to meet the 8-hour ozone standard.

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, State, and local levels and industries. The majority of these emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile source emissions that the majority of which are beyond SCAQMD's control. SCAQMD's Rule 1196 requires public fleet operators to acquire alternative-fuel heavy-duty vehicles when procuring or leasing these vehicles to reduce air toxic and criteria pollutant emissions. This rule applies to government agencies with 15 or more heavy-duty vehicles. In addition to federal action, the 2022 AQMP relies on substantial future development of advanced technologies to meet the standards, including the transition to zero- and low-emission technologies. The AQMP also incorporates the transportation strategy and transportation control measures from Southern California Association of Governments (SCAG)'s 2020-2045 RTP/SCS Plan (Connect SoCal) (SCAG 2020a).

Air Emission Thresholds

The SCAQMD approved the *CEQA Air Quality Handbook* in 1993. Since then, the SCAQMD has provided supplemental guidance on their website to address changes to the methodology and nature of CEQA. Some of these changes include recommended thresholds for emissions associated with both construction and operation of the project are used to evaluate a project's potential regional and localized air quality impacts (SCAQMD 2023).

Regional Thresholds

Table 6 presents the significance thresholds for regional construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis.

Table 6 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of VOC	55 pounds per day of VOC
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X

150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

VOC: volatile organic compound; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter measuring 10microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less

Source: SCAQMD 2023

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor by taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and project size. LSTs have been developed for emissions generated in construction and operation areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2009).

The project site is within SRA 7 (East San Fernando Valley). SCAQMD provides LST lookup tables for project sites that measure one, two, or five acres. The disturbance area of the project site is approximately 7.69 acres. Therefore, the LST analysis conservatively uses five-acre LSTs. LSTs are provided for receptors at a distance of 82 feet (25 meters), 164 feet (50 meters), 328 feet (100 meters), 656 (200 meters), 1,640 feet (500 meters) from the project disturbance boundary to the sensitive receptors. The border of construction and operational activity would occur approximately 90 feet from Ararat Homes Nursing Facility east of the project site. The LST analysis conservatively uses 82 feet receptor distance to provide a conservative and more stringent threshold. LSTs for construction in SRA 7 on a 5-acre site with a receptor 82 feet away are shown in Table 7.

Table 7 SCAQMD Construction and Operational LST Thresholds

	Allowable Emissions for a five-Acre Site in SRA-7 for a Receptor 82 Feet Away (pounds per day)	
Pollutant	**Construction**	**Operation**
Gradual conversion of NO_X to NO_2	96[1]	96[1]
CO	1,434	1,434
PM_{10}	14	4
$PM_{2.5}$	6[2]	2[2]

NO_x = Nitrogen Oxides; NO_2 = Nitrogen Dioxide; CO = Carbon Monoxide; PM_{10} = Particulate Matter with a diameter no more than 10 microns; $PM_{2.5}$ = Particulate Matter with a diameter no more than 2.5 microns

[1] The screening criteria for NOx were developed based on the 1-hour NO_2 CAAQS of 0.18 ppm. Subsequently to publication of the SCAQMD's guidance the USEPA has promulgated a 1-hour NO_2 NAAQS of 0.100 ppm. This is based on a 98th percentile value, which is more stringent than the CAAQS. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the 1-hour NO_2 NAAQS, an approximated LST was estimated to evaluate the federal 1-hour NO_2 standard. The revised LST threshold is calculated by scaling the NO_2 LST for by the ratio of 1-hour NO_2 standards (federal/State) (i.e., 171 lbs./day * (0.10/0.18) =96 lbs./day).

[2] The screening criteria for $PM_{2.5}$ were developed based on an Annual CAAQS of 15 mg/m^3. Subsequently to publication of the SCAQMD's guidance the annual standard was reduced to 12 mg/m^3. Because SCAQMD's LSTs have not been updated to address this new standard, to determine if project emissions would result in an exceedance of the annual $PM_{2.5}$ CAAQS, an approximated LST was estimated. The revised LST threshold is calculated by scaling the $PM_{2.5}$ LST for by the ratio of 24-hour $PM_{2.5}$ standards (federal/State) (i.e., 8 and 4 lbs./day * (12/15) =6.4 and 1.6 lbs./day).

Source: SCAQMD 2009

Toxic Air Contaminants Thresholds

SCAQMD has developed thresholds of significance for the emissions of toxic air contaminants (TACs) based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in 1 million (1×10^{-6}) or a cancer burden of 0.5 excess cancer cases in areas exceeding a one-in-one-million risk. In addition, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0 (SCAQMD 2023).

Methodology

Air pollutant emissions generated by project construction and operation were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod uses project-specific information, including the project's land uses, square footage for different uses (e.g., Industrial and parking), and location, to model a project's construction and operational emissions. The analysis reflects the construction and operation of the project as described under Section 3, *Project Description.*

Construction emissions modeled include emissions generated by construction equipment used on-site and vehicle trips associated with construction, such as worker and vendor trips. According to the project applicant, construction would start in July 2024 and finish in November 2031. The applicant provided the construction schedule and construction equipment used for construction activities. Default CalEEMod worker trips and vendor trips were used for the model. Construction would have three phases of construction that would occur over approximately seven years, and approximately 20,000 cubic yards of soil would be exported off-site during each of the three grading phases. The project would demolish, based on aerial google earth measurements, approximately 11,000 square feet of residential building material and remove approximately 34,000 square feet of concrete. Removal of concrete would add 53 hauling trips based on default CalEEMod assumptions during the site preparation phase. Soil and debris material would be hauled approximately 9.2 miles to Sunshine Canyon Landfill. It is assumed that the construction equipment used would be diesel-powered and the project would comply with applicable regulatory

standards. Construction activities of the project would comply with SCAQMD Rule 403 for dust control measures and Rule 1113 for architectural coating VOC limits.

Operational emissions modeled include mobile source emissions, energy emissions, area source emissions, and stationary source emissions. Mobile source emissions are generated by vehicle trips to and from the project site. The project would generate 1,093 daily vehicle trips and 10,430 vehicle miles traveled (VMT) per day, based on the transportation assessment letter prepared by Jano Baghdanian & Associates for the project (Jano Baghdanian & Associates 2022). Emissions attributed to energy use include natural gas consumption by appliances and space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings. The project would not include fireplaces based on information provided by the applicant. Stationary source emissions are generated by an emergency generator, which would operate 50 hours per year and two minutes per day.

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

Less than Significant Impact. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2022 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local county general plans and the SCAG's Connect SoCal socioeconomic forecast projections of regional population, housing, and employment growth.

The population growth forecasts in SCAG's Connect SoCal estimate that the City of Los Angeles' population would increase to 4,771,300 people in 2045, which is an increase of 837,500 people from the city's population in 2016 (SCAG 2020b). The project involves the development of 61 independent living units, 40 townhomes, 96 beds for the skilled nursing facility, and 234 beds for the assisted living and memory care building on the project site. Based on DOF average household size of 2.53 persons in the City of Los Angeles, the independent living apartment and townhomes would potentially add an estimated 256 residents to the city's population (Department of Finance [DOF] 2023). The assisted living and memory care, and skilled nursing facility is expected to house 330 residents (one person per bed). Therefore, the project is estimated to add 586 new residents within the city of Los Angeles, which would account for less than one percent of City's total projected population growth through year 2045. Therefore, potential indirect population growth generated by the project would be within the respective SCAG growth forecast.

The employment growth forecasts in SCAG's Connect SoCal for City of Los Angeles estimate that the total number of jobs would increase from 1,848,300 in 2016 to 2,135,900 in 2045, for an increase of 287,600 jobs (SCAG 2020a). The SCAG estimates employment density for "special care facilities," which include nursing homes, at 14.24 employees per acre for Los Angeles County (SCAG 2001). Although this classification does not include senior independent housing and townhomes, the eldercare facility consists of independent, townhome, and assisted living units, so this density factor is a conservative estimate. Based on these densities, the proposed project would generate about 77 jobs. The proposed project would account for less than one percent of the city's projected employment growth through year 2045; therefore, would be consistent with the SCAG's Connect SoCal growth forecast.

In addition, the AQMP provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and $PM_{2.5}$. As shown in Table 8 and Table 9, below, the project would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (ROG and NO_X) and $PM_{2.5}$ Since the project would also be consistent with population and housing, growth projections for the City, the project would not conflict with or obstruct implementation of the AQMP.

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

Less than Significant Impact. The SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The SCAB is designated unclassifiable or in attainment for all other federal and state standards.

Construction Emissions

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles. In addition, construction equipment would release VOC emissions during the drying of paving phases. Table 8 summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed SCAQMD thresholds. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

Table 8 Estimated Maximum Daily Construction Emissions

	Maximum Emissions (lbs/day)					
Construction Year	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2024	3	25	23	<1	1	1
2025	7	60	67	<1	10	6
2026	12	50	90	<1	10	4
2027	15	78	122	<1	17	7
2028	15	74	120	<1	17	7
2029	6	46	64	<1	10	5
2030	3	15	37	<1	4	1
2031	8	21	21	<1	7	2
Maximum Emissions (lbs/day)	**15**	**78**	**122**	**<1**	**17**	**7**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

lbs/day = pounds per day; VOC = Volatile organic compounds, NO_x = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: Some numbers may not add up precisely due to rounding considerations.

Source: Table 2.3 "Construction Emissions by Year, Mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards. See CalEEMod worksheets in Appendix B.

Operational Emissions

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), mobile sources (i.e., vehicle trips to and from the project site), and stationary sources (i.e., emergency generators). Table 9 summarizes the project's maximum daily operational emissions by emission source. As shown therein, operational emissions would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment, and impacts would be less than significant.

Table 9 Estimated Maximum Daily Operational Emissions

	Pollutant (lbs/day)					
Emissions Source	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	8	1	23	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	3	2	28	<1	7	2
Stationary	3	12	8	<1	<1	<1
Total	**14**	**16**	**60**	**<1**	**8**	**2**
SCAQMD Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

lbs/day = pounds per day; VOC = Volatile organic compounds, NO_x = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: Some numbers may not add up precisely due to rounding considerations.

Source: Table 2.6 "Operational Emissions by Sector, Mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards. See CalEEMod worksheets in Appendix B.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

Sensitive Receptors

According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors to the project site are the Ararat Homes of Los Angeles approximately 90 feet east of the project site and a single family residence approximately 120 feet north of the site. Localized air quality impacts to sensitive receptors typically result from localized criteria air pollutant emissions and TACs, which are discussed in the following subsections.

Localized Significance Thresholds

The LST methodology was developed to be used as a tool to analyze localized impacts associated with project-specific level proposed projects. If the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables (Appendix C of LST Methodology) and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant for air quality. The project analysis assumes main construction activity would occur approximately 90 feet east of the site. The allowable emission for project utilizes the 82 feet receptor distance, and the project is in SRA 7 (East San Fernando Valley). Table 10 summarizes the project's maximum localized daily construction and operational emissions from the proposed project. As shown therein, localized construction and operational emissions would not exceed SCAQMD LST thresholds. Therefore, project construction would result in a potentially significant impact from localized criteria pollutant emissions.

Table 10 Project LST Construction Emissions

Year	Maximum Daily Emissions (lbs./day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum On-site Emissions	73	100	10	6[1]
SCAQMD LST	96	1,434	14	6
Threshold Exceeded?	**No**	**No**	**No**	**No**
Maximum Operational Onsite Emissions	13	57	1	1
SCAQMD LST	96	1,434	4	2
Threshold Exceeded?	**No**	**No**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide
Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.
[1]The project would emit a maximum of 5.7 lbs./day of $PM_{2.5}$

Source: Table 3.1 – 3.46 "Construction Emission Details" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for compliance with SCAQMD Rule 403 fugitive dust. See CalEEMod worksheets in Appendix B.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the project's potential to result in impacts related to TAC emissions during construction and operation.

Construction

Construction-related activities would result in temporary project-generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998.

The proposed project would be consistent with the applicable AQMP requirements and control strategies intended to reduce emissions from construction equipment and activities. The proposed project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. In addition, Regulatory Compliance Measure (RCM) AQ-1 would implement construction measures such as use of Tier 4 engines, which would reduce DPM emissions by approximately 81 to 96 percent as compared to standard CalEEMod assumptions for engine tier. With these reductions, TAC concentrations at sensitive receptors would not be substantial, and construction-related health impacts would be less than significant..

Operation

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommended buffer distances between sensitive land uses and potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The project would not be located within prominent TAC sources above. In addition, residential land uses are not considered land uses that generate substantial TAC emissions based on reviewing the air toxic sources listed in CARB's guidelines. The expected hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the proposed land uses would be below thresholds warranting further study under the California Accidental Release Program. The project would not expose off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants.

Additional TAC emissions would occur from the use of one 600 kw emergency diesel generator that would backup power for both the Skilled Nursing Facility and the Assisted Living building. The generators would generate temporary TAC emissions from regular testing and maintenance activities. These emergency generators would be required to be permitted by SCAQMD; therefore, the generators would comply with SCAQMD emissions standards and would not emit substantial TAC emissions. In addition, operation of the project did not exceed SCAQMD LST thresholds for PM. Therefore, operational TAC impacts would be less than significant.

Regulatory Compliance Measure

AQ-1 Construction Emissions Reduction. Prior to issuance of grading permits, the County shall confirm that the grading plan, building plans, and specifications stipulate that the following measures shall be implemented:

- All mobile off-road equipment (wheeled or tracked) used during construction activities shall meet the U.S. EPA Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards.

- Alternative fuel (natural gas, propane, electric, etc.) construction equipment shall be incorporated where available. These requirements shall be incorporated into the contract agreement with the construction contractor. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment on-site.

- Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.

The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction.

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

Less than Significant Impact. During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary and would cease upon completion, and odors disperse with distance. In addition, project construction would be required to comply with SCAQMD Rule 402, which specifies that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Overall, project construction would not generate other emissions, such as those leading to odors, affecting a substantial number of people. Construction-related impacts would be less than significant.

With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list. In addition, solid waste generated by the proposed on-site uses would be properly stored in lidded dumpsters and/or trash cans and collected by a contracted waste hauler, ensuring that on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, the proposed project would not generate other emissions such as those leading to odors affecting a substantial number of people, and no operational impact would occur.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Rincon prepared a Biological Resources Assessment (BRA), dated November 2018, which is included as Appendix C1 in this MND. The BRA for the proposed project consists of a review of relevant literature and project documents and a reconnaissance level field survey conducted on April 3, 2018. In addition, a Tree Report was prepared for the project by Arborgate Consulting, Inc. in March 2022, which is included as Appendix C2 in this MND. The Tree Report provides an arboricultural evaluation of approximately 250 trees' health and condition, identifies protected trees, the number of replacement trees required, and regulatory compliance measures that will be implemented to protect the trees during project construction, if necessary.

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. Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, sensitive species, or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Special-Status Plant Species

During the reconnaissance field survey conducted on April 3, 2018, no special-status plant species were observed or otherwise detected. While some potentially occurring plant species may not have been blooming at the time of the survey, elements of suitable habitat for special-status plant species were not documented within the project site. It is unlikely that species would be present due to the isolation of the site from surrounding open areas and natural habitat and the site's history of disturbance (historically for cultivation and grazing, presently as residential properties). No special-status plant species have a moderate or high potential to occur in the project site. Therefore, the project would result in less-than-significant impacts to special-status plants and no mitigation is required.

Special-Status Wildlife Species

Locally designated California towhee (Los Angeles County Sensitive Bird Species Working Group 2009), and migratory or other common nesting birds protected by the CFGC and MBTA may nest onsite. Construction of the project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact California towhee and nesting birds protected under the CFGC and MBTA. The loss of a nest due to construction activities would be a violation of the MBTA and CFGC 3503. However, the project applicant would be required to comply with 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 CFGC Code, as described in Regulatory Compliance Measure BIO-1, below. The pre-construction surveys for nesting birds would ensure that no significant impacts related to nesting birds would occur.

Construction of the project would alter California towhee nesting and foraging habitat onsite with updated landscaping impacting the 0.69 acres of California buckwheat scrub. The towhee is a fairly common bird in native scrub habitats and has also adapted to urban and residential areas, occupying shrubby backyards and city parks (Cornell Lab of Ornithology 2018). On-site, it is likely using all vegetation types (scrub, ruderal, and landscaped) for nesting and foraging. Construction of the project would marginally reduce the towhee's nesting and foraging habitat given the availability of suitable habitats adjacent to the project site (patches of coastal sage scrub and a landscaped residential area to the north, and Eden Memorial Park to the east) and the project's proposal to include large, landscaped areas. Therefore, impacts to California towhee nesting and foraging habitat would be less than significant.

Regulatory Compliance Measure

BIO-1 Nesting Bird Survey. To avoid disturbance of nesting and special status birds including raptorial species protected by the MBTA and Sections 3503, 3503.5, and 3513 of the CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (generally February 1 through August 31, but variable based on seasonal and annual climatic conditions). If construction must begin within the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 3 days prior to initiation of ground disturbance and vegetation removal. The nesting bird pre-construction survey shall be conducted within the disturbance footprint and a 100-foot buffer with inaccessible areas (i.e., private lands) surveyed using binoculars. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in Los Angeles County. Should land clearing activities pause for more than one week during the bird breeding season, another nesting bird survey shall be conducted prior to reinitiation of such activities.

If active nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. If an active nest of a special-status bird species is found, the City shall be consulted. 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. The biologist shall monitor the active nest(s) during initial land clearing activities and/or construction activities to determine whether the recommended avoidance buffer(s) is adequate to the point that nesting activities are not stressed or jeopardized. No ground disturbing activities shall occur within this 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.

The methods and results of the nesting bird survey(s), any nesting bird avoidance efforts as a result of those surveys, and the success of the avoidance buffers shall be documented in a letter report (Nesting Bird Survey and Active Nest Monitoring Report)

and shall be submitted to the City no later than three weeks following the completion of the survey(s) and/or active nest monitoring activities.

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. A project would normally have a significant impact on biological resources if it could result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community.

Riparian habitat is adjacent to the onsite drainage: a thick stand of cattail less than 0.1-acre in size. No other sensitive plant communities were observed on the project site during the reconnaissance survey, the project is not located in any Significant Ecological Areas, and no critical habitat is present onsite. Therefore, the proposed project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Services (USFWS) However, Project construction activities, the proposed widening of the existing dirt driveway, and project landscaping could potentially interfere portions of the non-critical riparian habitat, conservatively estimated at 0.1 acre, as discussed above..

Thus, implementation of standard avoidance and minimization Best Management Practices (BMPs) , as required by the LARWQCB, CDFW, and USACE, would reduce the potential encroachment of Project activities into this non-critical plant community to a less than significant level before mitigation.

Regulatory Compliance Measure

BIO-2 **Avoidance and Minimization**. Prior to issuance of any grading or building permit, the following Best Management Practices (BMPs) shall be implemented:

i.) Any material/spoils generated from project activities shall be located away from special-status habitat and protected from storm water run-off using temporary perimeter sediment barrier such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.

ii.) Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank where the non-critical habitat exists.

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. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. Both the onsite and offsite drainages and associated wetland and riparian vegetation discussed above are potentially subject to USACE, LARWQCB, and CDFW jurisdiction. The onsite drainage contains vegetation that may be indicative of wetland habitat and likely connects to the offsite drainage. It is unknown whether the offsite drainage connects to downstream Relatively Permanent Waters (RPW) or Traditionally Navigable Waters (TNW). Grading and landscaping associated with project construction and proposed widening of the dirt driveway will likely directly impact, and potentially eliminate, the entirety of the onsite drainage, conservatively estimated to be up to 0.5 acre.

Since it is unknown, compliance with RCM BIO-2, above, would reduce any potential impacts to a less than significant level.

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

Less than Significant Impact. A project would normally have a significant impact on biological resources if it could result in interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

Land uses surrounding the project site consist primarily of urban and residential development, including community services such as a memorial park/cemetery (to the west), a retirement community and hospital (to the east), high school baseball and football fields (to the south), and small open and agricultural areas that are bounded to the north by I-5 and I-405. The project is not located in an *Essential Connectivity Area*, as determined by the California Essential Habitat Connectivity Project. Essential Connectivity Areas are generally large remaining blocks of intact habitat or natural landscape that need to be maintained, particularly as corridors for wildlife (Spencer *et al.* 2010). Given the developed nature of the surroundings, the site would not function as a wildlife corridor/linkage or as a wildlife nursery site. The drainage located just east of the project site would also not serve as a wildlife movement corridor as it is lined in large rocks with little to no vegetation and lacks connection to larger expanses of habitat. Therefore, development

of the site would not obstruct or affect a wildlife corridor or nursery site and impacts would be less than significant.

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

No Impact. The proposed project would have a significant effect on biological resources if it would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The proposed project would not conflict with policies of the City's General Plan protecting biological resources. The proposed project would not conflict with Section 6, Policy 1 as sensitive species have low likelihood to occur, and compliance with RCM BIO-1 would reduce impacts to nesting birds to a less-than-significant level. The proposed project would also not conflict with Section 12, Policy 1 as no significant habitat areas, corridors or buffers are present onsite. Therefore, the proposed project is consistent with these policies and no mitigation is required.

The field survey conducted on April 3, 2018 did not identify any trees on the project site that are protected by the City of Los Angeles Tree Protection Ordinance (No. 177404; City of Los Angeles 2006b). While both blue elderberry and toyon are present on-site, the amendment to add them to the City's protected trees list has not been formally adopted by the Los Angeles City Council (City of Los Angeles 2017, 2018). Therefore, the project would not conflict with any local policies or ordinances protecting biological resources. Thus, no impact would occur.

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

No Impact. The project site is not located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

V. CULTURAL RESOURCES

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

CEQA requires a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

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

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

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:

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; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Rincon prepared a Cultural Resources Assessment (CRA) in September 2023, which includes searches of the California Historical Resources Information System (CHRIS) and the Native American Heritage Commission (NAHC) Sacred Lands File (SLF), Native American outreach, archaeological and built environment field surveys of the project site, background and archival research, and evaluation of two properties within the project site for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and for designation as City of Los Angeles Historic Cultural Monuments (HCMs) or Historic Preservation Overlay Zone (HPOZ) contributors. The following analysis is based on the results of the Cultural Resources Assessment, which is provided in full as Appendix D.

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

Less than Significant Impact. Section 21084.1 of CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources. A historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (Section 21084.1), a resource included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section 15064.5[a][3]).

During the two built environment field surveys on the project site in April 2018, Rincon identified the presence of properties featuring historic-period development at 15151 and 15155 Mission Hills Road, within the project site. These two properties were recorded on California Department of Parks and Recreation 523 Series forms (DPR forms) and evaluated for historical significance. As a result of this study, 15151 and 15155 Mission Hills Road are recommended ineligible for listing in the NRHP, CRHR and for local designation and therefore, are not considered historical resources for the purposes of CEQA.

The background research conducted for this study identified one SurveyLA identified resource in the immediate vicinity of the proposed project site, Eden Memorial Park Cemetery, located adjacent (to the west) of the proposed project site. All potential impacts associated with construction of the proposed project are anticipated to be temporary in nature and would not result in permanent impacts to Eden Memorial Park Cemetery. While the proposed project would introduce several buildings to the vicinity of Eden Memorial Park Cemetery, the property that encompasses the potential resource is expansive and overall, its setting, which includes development such as I-405, would not be significantly altered by the proposed project. In conclusion, the project would not cause a substantial adverse change in the significance of a historical resource. Impacts would be less than significant.

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 of the CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

Rincon Consultants completed a CHRIS records search on March 20, 2018, at SCCIC located at the California State University, Fullerton. The SCCIC records search identified five previously recorded cultural resources within a 0.25-mile radius of the project site, none of which are on the project site. Three of the previously recorded cultural resources identified by the CHRIS search including P-19-000169 (the San Fernando Mission Archaeological Site), P-19-000960, (the San Fernando Mission Dam), and P-19-167231 (the Mission San Fernando Rey de Espana Convento building) are historic-period resources associated with the Mission. None of the previously recorded resources identified by the CHRIS search are located within the current project site. Due to the presence of Mission San Fernando approximately 0.5 mile to the south and three previously recorded Mission-related resources within 0.50-mile of the project site, the project site is considered sensitive for historic-period archaeological resources.

Rincon contacted the NAHC on March 29, 2018, to request a SLF search of the project site and a contact list of Native Americans culturally affiliated with the project area. The NAHC responded on March 30, 2018, stating the result of the SLF search was negative; however, a SLF search conducted in 2021 was positive. Additionally, during the Native American outreach conducted for the study in 2018 and 2021, Native American contacts identified the project site as culturally sensitive. The 2018 outreach resulted in a request for Native American monitoring during project-related development within previously undisturbed areas. Please see the Tribal Cultural Resources section below for additional information.

Rincon also conducted a pedestrian archaeological survey on the project site on April 3, 2018. Although no archaeological resources were found during the survey, the project site is considered sensitive for archaeological resources due to its proximity to the mission. Therefore, the following recommended Mitigation Measures CUL-1 through CUL-2 for monitoring and for unanticipated discoveries during construction would be implemented to reduce impacts to a less than significant level.

Mitigation Measures

CUL-1 **Worker's Environmental Awareness Program.** A Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity shall be conducted by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) and a Native American representative for all construction personnel prior to the commencement of any ground disturbing activities. The WEAP training shall include a description of the types of cultural material that may be encountered,

cultural sensitivity issues, the regulatory environment, and, in the event of a discovery, the proper protocol for treatment of the materials. Attendees shall include construction supervisors, equipment operators, Ararat Homes, and City of Los Angeles staff to ensure that all parties understand their respective roles and responsibilities. Attendees shall fill out a sign-in sheet acknowledging that they received the WEAP training.

CUL-2 **Cultural Resources Monitoring.** A qualified archaeologist shall observe ground-disturbing activities up to five feet below the surface of native intact soil, unless there is evidence to suggest cultural resources extend below the specified depth. Ground disturbing activities include, but are not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, drainage and irrigation removal and installation, and archaeological work. If cultural resources are encountered, the qualified archaeologist shall have the authority to request ground disturbing activities cease within 60 feet of the discovery to assess and document potential finds. After approximately 50 percent of initial ground-disturbing activities have been completed, the qualified archaeologist shall discuss with Ararat Homes and City of Los Angeles staff the potential to reduce the level of cultural resources monitoring to "spot monitoring" or even to cease cultural resources monitoring based on the condition and types of soil observed during monitoring and the monitoring results to date.

Significance After Mitigation

Mitigation Measures CUL-1 through CUL-2 would reduce archaeological resource impacts to a less than significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant with Mitigation Incorporated. A significant impact would occur if previously interred human remains would be disturbed during grading of the project site. The cemetery, Eden Memorial Park, is located adjacent to the project site. There is a remote possibility that human remains could be encountered during project construction. Should unanticipated human remains be discovered during project construction, compliance with the Mitigation Measure CUL-3 would reduce impacts to a less-than-significant level.

Mitigation Measures

CUL-3 **Human Remains.** In the unlikely event of an unexpected discovery of human remains, all ground-disturbing activities in the vicinity of the discovery will be immediately suspended and redirected elsewhere. All steps required to comply with State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 including contacting the Los Angeles County Coroner will be implemented. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete an inspection of the site and

provide recommendations for treatment to the landowner within 48 hours of being granted access.

Significance After Mitigation

With implementation of CUL-3, impacts regarding human remains would be less than significant.

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

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration 2023a). Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, fireplaces, and other uses such as industrial processes in addition to being consumed by alternative fuel vehicles. Most of California's electricity is generated in state with approximately 41 percent imported from the Northwest and Southwest in 2022; however, the state relies on out-of-state natural gas imports for nearly 90 percent of its supply (California Energy Commission [CEC] 2023a and 2023b). In addition, approximately 52.2 percent of California's electricity supply in 2022 came from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2023a). In 2022, Senate Bill 1020 (SB 1020) creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all state agencies by 2035. Electricity would be provided to the project by the Los Angeles Department of Water and Power (LADWP) and natural gas service would be provided by SoCal Gas. Table 11 summarizes the electricity and natural gas consumption for Los Angeles County, in which the project site would be located, and for LADWP and SoCal Gas, as compared to statewide consumption.

Table 11 2022 Electricity and Natural Gas Consumption

Energy Type	Los Angeles County	LADWP/SoCalGas	California	Proportion LADWP and SoCal Gas Consumption [1,2]	Proportion of County Consumption [1,2]
Electricity (GWh)	68,485	21,842	287,826	8%	24%
Natural Gas (millions of therms)	2,820	5,026	11,711	43%	24%

GWh = gigawatt-hours

[1] Proportion to statewide consumption.

[2] LADWP electricity consumption compared to statewide consumption, and SoCalGas natural gas consumption compared to statewide consumption.

[3] For reference, the population of Los Angeles County (9,834,503 persons) is approximately 25 percent of the population of California (39,078,674 persons) (California Department of Finance 2023).

Source: CEC 2023c

Petroleum fuels are primarily consumed by on-road and off-road equipment in addition to some industrial processes, with California being the 7th largest petroleum-producing state in the nation in 2021 (United States Energy Information Administration 2023b). Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 13.6 billion gallons sold in 2022. Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 2.3 billion gallons sold in 2022 (CEC 2023d). Table 12 summarizes the petroleum fuel consumption for Los Angeles County, in which the project site would be located, as compared to statewide consumption.

Table 12 2022 Annual Gasoline and Diesel Consumption

Fuel Type	Los Angeles County (gallons)	California (gallons)	Proportion of Statewide Consumption[1]
Gasoline	3,070	13,640	23%
Diesel	295	2,290	13%

[1] For reference, the population of Los Angeles County (9,834,503 persons) is approximately 25 percent of the population of California (39,078,674 persons) (California Department of Finance 2023).

Source: CEC 2023d

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and GHG emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Section 3, *Air Quality*, and Section 6, *Greenhouse Gas Emissions*, respectively.

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

The proposed project would use nonrenewable and renewable resources for construction and operation of the project. The anticipated use of these resources is detailed in the following subsections. Applicant-provided information, the CalEEMod outputs for the air pollutant and GHG emissions modeling (Appendix B), and the daily vehicle trips and VMT in the Traffic Impact Analysis (TIA) completed for the project (Appendix H1) were used to estimate energy consumption associated with the proposed project.

Construction Energy Demand

Less than Significant Impact. The project would require demolition, site preparation, and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles

and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. As shown in Table 13, project construction would require approximately 1,184,267 gallons of gasoline and approximately 989,892 gallons of diesel fuel. These construction energy estimates are conservative because they assume that all the construction equipment operates all day every day during the specific construction phases.

Table 13 Estimated Fuel Consumption During Construction

Source	Fuel Consumption (gallons) Gasoline	Fuel Consumption (gallons) Diesel
Construction Equipment, Hauling Trips, and Vendor Trips	N/A	989,892
Construction Worker Vehicle Trips	1,184,267	N/A

Notes: N/A = not applicable

See Appendix B for energy calculation sheets.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the U.S. environmental Protection Agency Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements, such as 2022 California Green Building Standards Code (CALGreen), the project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction impacts related to energy consumption would be less than significant.

Operation of the project would contribute to regional energy demand by consuming electricity, natural gas, gasoline, and diesel fuels. Electricity and natural gas would be used for heating and cooling systems, lighting, appliances, and water and wastewater conveyance, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by customers, employees, and facility operations. Table 14 summarizes estimated operational energy consumption for the proposed project. As shown therein, project operation would require approximately 172,293 gallons of gasoline and 71,799 gallons of diesel for transportation fuels, 2,760 gallons of diesel for the emergency generator, 1.7 GWh of electricity, and 4,198 MMBtu of natural gas. Vehicle trips associated with future workers, customers, and deliveries would represent the greatest operational use of energy associated with the proposed project.

Table 14 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption[1]	Energy Consumption[1]
Transportation Fuels		
Gasoline	172,293 gallons	203,448 U.S. Therms
Diesel	71,799 gallons	9,152 U.S. Therms
Stationary	2,760 gallons	3,784 U.S. Therms
Natural Gas	4,198 MMBtu	45,152 U.S. Therms
Electricity	1.7 GWh	62,387 U.S. Therms

MMBtu = million metric British thermal units; GWh = gigawatt-hours

[1] Energy consumption is converted to MMBtu for each source.

See Appendix B for CalEEMod output results for electricity and natural gas usage.

The project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CALGreen standards (California Code of Regulations Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the latest Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are crafted so that buildings do not result in wasteful, inefficient, or unnecessary consumption of energy.

Furthermore, the project would reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by Colton Electricity Utility continues to increase to comply with State requirements through SB 1020, which creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all state agencies by 2035. As discussed in Section 8, *Greenhouse Gas Emissions*, the project would be consistent with the local and regional GHG reduction measures, such as implementing water and energy efficient appliances consistent with Title 24 Energy Code. Therefore, project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy.

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

Less than Significant Impact. As discussed in Section 8, *Greenhouse Gas Emissions*, several plans and policies have been adopted to reduce GHG emissions in the project region that would also have the effect on reducing energy use, including the State's 2022 Scoping Plan, the 2020-2045 RTP/SCS, the City's LA Green Plan, and the Sustainable City pLAn/Green New Deal. The project would also be subject to State requirements for energy efficiency, including the mandatory measures for residential development contained in the 2022 CALGreen and Title 24 Building Energy Efficiency Standards. The proposed project would comply with Title 24 Building Energy

Efficiency Standards by including energy and water-efficient appliances and fixtures in all buildings, as well as water efficient irrigation systems, in accordance with the CALGreen standards, which would reduce the project's water use and energy needed to provide water to the project. The project would be consistent with the solar provisions of the 2022 Title 24 Building Energy Efficiency Standards. A shuttle service would be provided to connect the upper campus (independent living apartments and townhomes) to the lower campus (skilled nursing facility, and assisted living and memory care). The site has access to Los Angeles County Metropolitan Transportation Authority ("Metro") bus route 236 along Rinaldi Street, 580 feet south of the project site. In addition, the project would also include 81 bicycle parking spaces and would improve off-site sidewalks to connect with off-site properties. Therefore, the project would support increasing the percentage of trips made by walking, biking, and transit as well as the reduction of per capita VMT, consistent with the City's Conservation and Mobility elements in the General Plan. Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and there would be a less than significant impact.

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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or

based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. Based upon criteria established in the L.A. CEQA Thresholds Guide, a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. For the purpose of these specific issues, a significant impact may occur if:

- A project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed; or
- A proposed project represents an increased risk to public safety or destruction of property by exposing 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.

The Alquist-Priolo Act requires the State Geologist to map active earthquake fault zones. While none of the project site parcels are within an earthquake zone, the parcel immediately north of the project site is partially located in the San Fernando Fault Zone Area (California Department of Conservation 2023b). Because there are no known active or potentially active faults beneath the project site, the potential for surface ground rupture at the project site is considered low. Impacts would be less than significant.

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

ii) Strong seismic ground shaking?

Less than Significant Impact. The entire southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, development of the project could expose people and structures to strong seismic ground shaking. However, the project would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The project would be required to comply with the seismic safety requirements in the International Building Code (IBC), the CBC, and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Therefore, impacts related to strong seismic ground shaking would be less than significant.

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

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure

or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project site is located in an area identified as having a high risk of liquefaction.

According to the project's Geotechnical Report prepared by Applied Earth Science (AES) dated November 2, 2018 (Appendix E1) and the California Department of Conservation's Earthquake Zones of Required Investigation map, the project site is not in a mapped liquefaction zone (AES 2018; California Department of Conservation 2023b). Therefore, liquefaction impacts would be less than significant. In addition, on July 10, 2023, the City issued a Soils Report Approval Letter for the project under Log #117233-03 (refer to Appendix E2). The conditions in the Soils Report Approval Letter are by reference incorporated herein. Furthermore, the applicant would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX of the LAMC), the IBC, and the CBC. The CBC and IBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions.

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

iv) Landslides?

Less than Significant Impact. Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project site is located in an area identified as having a high risk of landslide.

While the project site is not in a mapped landslide zone (AES 2018; California Department of Conservation 2023b), the project site is located on sloped terrain. The applicant would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX of the LAMC), the IBC, and the CBC. The CBC and IBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions. Compliance with City and State building codes would reduce potential landslide impacts to the maximum extent practicable, with current engineering practices. Therefore, impacts would be less than significant.

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

Less than Significant Impact. A significant impact would occur if construction activities or proposed uses would result in substantial soil erosion or loss of topsoil. Construction of the project would result in ground surface disturbance during site clearance and grading, which could create the potential for soil erosion. Accordingly, short-term erosion impacts may result from construction of the project. Furthermore, the project site is in a gently sloping hillside area, which may increase potential erosion impacts. However, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Article 1, Division 70 of the LAMC. In addition, because the

project would disturb more than one acre of area, the applicant would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and prepare a Stormwater Pollution Prevention Plan (SWPPP), which includes BMPs for erosion control. Given the regulatory compliance measures required, project erosion impacts would be less than significant.

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

Less than Significant Impact. Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would have a significant geologic hazard impact if:

- A project would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury (for the purpose of this specific issue, a project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding);
- A project is built in an unstable area without proper site preparation or design features that provide adequate foundations for proposed buildings, thus posing a hazard to life and property; or
- A project is built on expansive soils without proper site preparation or design features that provide adequate foundations for project buildings, thus posing a hazard to life and property.

As described under thresholds *a.iii* and *a.iv* above, the project site is not in a mapped liquefaction or landslide zone. Lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry. Because the project is not within a liquefaction or landslide zone, lateral spreading impacts would be less than significant. In addition, the applicant would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX of the LAMC), the IBC, and the CBC. The CBC and IBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions and ensure that the integrity of the project site and the proposed structures is maintained. With compliance to City and State building codes, potential impacts from landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. A significant impact would occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. However, as applicable, the proposed project would be required to comply with the requirements of the City of Los Angeles Building Code (Chapter IX of the LAMC), IBC, CBC, and other applicable building codes. Compliance with such

requirements would ensure project design accounts for potential soil expansion in the foundation and building designs. The CBC and IBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions. Therefore, impacts related to expansive soils would be less than significant.

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

No Impact. The project would have a significant impact if adequate wastewater disposal were not available. The project site is in an urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the site. Therefore, no impact would occur.

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

Less than Significant with Mitigation. A significant impact would occur if construction activities associated with the project would disturb paleontological or unique geological features. The project is not mapped in an area of known vertebrate paleontological resource; however, it is mapped in an area of older surface sediments where fossils are likely to be found (City of Los Angeles 1995a). Should unanticipated paleontological resources be discovered during project construction, compliance with the following mitigation measure would reduce impacts to a less-than-significant level.

Mitigation Measures

GEO-1 **Paleontological Resources.** In the event that paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of City Planning shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. The paleontologist shall record the find and determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. If the discovery proves significant under CEQA, additional work, such as preparation of a treatment plan, testing, or data recovery, could be warranted shall be submitted to the Development Services Director or his/her designee. The final determination of any resource if discovered on the project site, shall be subject to the recommendation of a qualified paleontologist.

Significance After Mitigation

Mitigation Measure GEO-1 would reduce paleontological resource impacts to a less than significant level.

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

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. The majority of radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of a specific GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

The United Nations IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately

1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (California Natural Resource Agency 2019).

Significance Thresholds

Based on Appendix G of the CEQA Guidelines, impacts related to GHG emissions from the project would be significant if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. As a result, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

CEQA Guidelines Section 15064.4 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, 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]). According to CEQA Guidelines Section 15183.5, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, Beyond Newhall and 2020, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016).

The City of Los Angeles' Green New Deal aims to reduce 50 percent of GHG emissions below 1990 levels by 2025, 73 percent of GHG emission by 2035, and carbon neutral by 2050 (City of Los Angeles 2019). The city has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reduction GHG

emissions. Neither the SCAQMD, the California Office of Planning and Research, California Air CARB, the California Air Pollution Control Officers Association (CAPCOA), or any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Therefore, in recent environmental impact reports certified by the City of Los Angeles, the city has evaluated the significance of projects' potential impacts regarding GHG emissions and climate change solely on consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change.

In the absence of any adopted 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 complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2022 Scoping Plan, the 2020-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City's LA Green Plan, and the Sustainable City pLAn/Green New Deal. GHG emissions from the construction and operation of the project are provided for informational purposes.

Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98 percent of all GHG emissions by volume and are the GHG emissions the project would emit in the largest quantities (IPCC 2014). Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (i.e., CO_2e). Minimal amounts of other GHGs (such as chlorofluorocarbons) would be emitted; however, these other GHG emissions would not substantially add to the total GHG emissions. GHG emissions associated with project construction and operation were estimated using CalEEMod, version 2022.1, with the assumptions described under Section 3, *Air Quality*, in addition to the following:

- The project's CalEEMod model uses default CalEEMod assumptions for water, energy, area, solid waste, and stationary sources for congregate care, mid-rise apartments, townhomes, and enclosed/unenclosed parking lot.

- In accordance with SCAQMD's recommendation, GHG emissions from construction of the proposed project were amortized over a 30-year period and added to annual operational emissions to determine the project's total annual GHG emissions (SCAQMD 2008).

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

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

Less than Significant Impact. Plans and policies have been adopted to reduce GHG emissions in the Southern California region, including the State's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, the LA Green Plan/Climate LA, and the Sustainable City pLAn/Green New Deal. As discussed herein, the project would not conflict with plans and policies aimed at reducing GHG emissions. GHG emissions are provided for informational purposes.

Consistency with Applicable Plans and Policies

2022 Scoping Plan

The principal state plan to monitor and regulate GHGs is the AB 32, the California Global Warming Solutions Act of 2006, which was followed by SB 32. The quantitative goal of AB 32 was to reduce GHG emissions to 1990 levels by 2020. According to CARB, California achieved its 2020 GHG emission reduction target in 2016. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT.
- Building Decarbonization.
- Maximizing recycling and diversion from landfills.

The proposed project would be consistent with these goals through project design, which includes energy fixtures and appliances consistent with the latest Title 24 Green Building Code and Building Efficiency Energy Standards. In addition, the project would include solar panels on the roof of the memory care, assisted living, and independent living buildings, consistent with the provisions with the latest Title 24 Building Efficiency Energy Standards. The project would be served by Los Angeles Department of Water & Power (LADWP), which is required to increase its renewable energy procurement in accordance with SB 100 targets. Pursuant to the Title 24 CALGreen Standards, the project would install water efficient faucets, and toilets, water efficient landscaping and irrigation, and a cistern to reclaim water. A shuttle service would be provided to connect the upper campus (independent living apartments and townhomes) to the lower campus (skilled nursing facility, and assisted living and memory care). The site has access to Los Angeles

County Metropolitan Transportation Authority ("Metro") bus route 236 along Rinaldi Street, 580 feet south of the site. The proposed project will not conflict with the 2022 Scoping Plan.

SCAG's 2020-2045 RTP/SCS

On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars in the SCAG region by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2020-2040 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The project's consistency with the 2020-2045 RTP/SCS is discussed in Table 15. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 15 Project Consistency with Applicable SCAG RTP/SCS Strategies

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ 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 ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent.** The proposed project is an infill redevelopment that would increase residential density within approximately 580 feet from bus route 236 along Rinaldi Street. The project would provide 81 bicycle parking spaces on-site and promote alternative modes of transportation. Additionally, the project is within a one-mile driving distance of several residential neighborhoods, which could potentially reduce commute times to new job opportunities. Therefore, the project focuses on growth near destinations and mobility options.
Leverage Technology Innovations ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** The project would include a shuttle service that would transport employees and residents to and from the upper and lower campuses of the project site. In addition, the project would provide a roundabout drop-off area for vehicles on both campuses. Additionally, the project would include solar panels on the memory care, assisted living, and independent living building roof tops, consistent with the provisions of the Title 24 Building Energy Efficiency Standards. Therefore, the project would leverage technology innovations.
Support Implementation of Sustainability Policies ▪ Continue to support long range planning efforts by local jurisdictions	**Consistent.** The project would be consistent with the City of Los Angeles' Green LA and Sustainable City pLAn/Green New Deal (see Table 10). In addition, it would be constructed in

Reduction Strategy	Project Consistency
	accordance with Building Energy Efficiency Standards and the Green Building Code for Los Angeles. Therefore, the project would support long-range planning efforts by the local jurisdiction.
Promote a Green Region ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity	**Consistent.** The project is an infill redevelopment project that would involve the construction of residential uses in an urbanized area. Therefore, it does not interfere with regional wildlife connectivity or converts agricultural land. The project includes space designated for solar panels, which would facilitate future installation. In addition, the project would install a cistern to reclaim water and adhere to the City's Protected Tree Ordinance in the project's landscaping plan. The landscaping plan would include the planting of 374 various tree species. Therefore, the project would support the development of a green region.

Source: SCAG 2020

Green LA and Sustainable City pLAn/Green New Deal

Table 16 and Table 17 summarize the project's consistency with the Green LA and Sustainable City pLAn, respectively. As discussed therein, the project would be consistent with the actions and measures contained in these local GHG reduction plans.

Table 16 Project Consistency with Applicable Green LA Actions

Action	Project Consistency
Energy	
Present a comprehensive set of green building policies to guide and support private sector development.	**Consistent.** The project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code.
Water	
Meet all additional demand for water resulting from growth through water conservation and recycling.	**Consistent.** While this action primarily applies to the City and LADWP, the project would be consistent with the requirements in the 2022 California Building Code and the 2020 Los Angeles Green Building Code, such as incorporating water efficient faucets, and toilets, and water efficient landscaping and irrigation. In addition, the project would install a cistern to reclaim water.
Reduce per capita water consumption by 20 percent.	**Consistent.** See discussion above.
Transportation	

Action	Project Consistency
Promote walking and biking to work, within neighborhoods, and to large events and venues.	**Consistent.** The project would be within approximately 1,000 feet north of the metro bus route 236 and 239 along Rinaldi Street. The project would also include 81 bicycle parking spaces on-site and improve off-site sidewalks to provide better pedestrian network to off-site properties. Therefore, the project would promote walking and biking to work and within the local neighborhood.
Land Use	
Promote high-density housing close to major transportation arteries.	**Consistent.** The project would increase residential density on the project site by demolishing two single family residents and constructing 60 apartment units, 40 townhouses, and 330 beds. In addition, the project site is located approximately 1,000 feet from metro bus route 239, and a quarter mile from the Interstates 5 and 405 interchange. Therefore, the project would site higher density housing close to a major transportation artery.
Waste	
Recycle 70 percent of trash by 2015.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Bureau of Sanitation 2013). The project would be subject to the requirements of AB 341, which requires multi-family residential buildings with five or more units to have a recycling program and establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.

Source: City of Los Angeles 2007

Table 17 Project Consistency with Applicable Sustainable City pLAn/Green New Deal Measures

Action	Project Consistency
Renewable Energy ▪ LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045. ▪ Increase cumulative megawatts by 2025; 2035; and 2050 of: Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. Demand response (DR) programs to 234 MW (2025) and 600 MW (2035).	**Consistent.** While this action primarily applies to the City and LADWP, LADWP is required to generate electricity that would increase renewable energy resources to 33 percent by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045 under SB 100. Because LADWP would provide electricity service to the project site, the project would use electricity consistent with the requirements of SB 100 and City goals. In addition, the project would include solar panels consistent with the provisions of the latest Title 24 Standards.
Local Water ▪ Source 70% of L.A.'s water locally and capture 150,000 acre-feet per year of stormwater by 2035. ▪ Recycle 100% of all wastewater for beneficial reuse by 2035. ▪ Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. ▪ Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050 ▪ Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.	**Consistent.** While this action primarily applies to the City and LADWP, the project would incorporate water conservation features to reduce water use. The project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, and plumbing fixtures and fittings.
Clean and Healthy Buildings ▪ All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. ▪ Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	**Consistent.** The project would be constructed in accordance with the applicable requirements of CALGreen and the City's Green Building Code.
Mobility & Public Transit ▪ Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. ▪ Reduce vehicle miles traveled per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.	**Consistent.** The project is an infill redevelopment project located approximately 580 feet south 1,000 feet north of metro bus route 236 and 239, respectively, along Rinaldi Street. Several residential neighborhoods are within one mile of the project site, which could potentially reduce commute to work for employees. The project would also include 81 bicycle parking spaces and would improve off-site sidewalks to connect with off-site properties. Therefore, the project would support increasing the percentage of trips made by walking, biking, and transit as well as the reduction of per capita VMT.

Action	Project Consistency
Waste and Resource Recovery ▪ Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 ▪ Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 ▪ Eliminate organic waste going to landfill by 2028 Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.	**Consistent.** The City of Los Angeles has achieved a landfill diversion rate of 76 percent (Los Angeles Bureau of Sanitation 2013). The project would be subject to the requirements of the statewide multi-family residential recycling program, which mandates that a multi-family residence with five or more units must recycle. Compliance with existing City and state programs would achieve consistency with this measure.
Urban Ecosystems and Resilience ▪ Increase tree canopy in areas of greatest need by at least 50% by 2028. ▪ Complete or initiate restoration identified in the 'ARBOR' Plan by 2035. ▪ Create a fully connected LARiverWay public access system that includes 32 miles of bike paths and trails by 2028. ▪ Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035. ▪ Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050. ▪ Achieve and maintain 'no-net loss' of native biodiversity by 2035.	**Consistent.** The project would be an infill redevelopment in an urbanized area and thus would not adversely impact native biodiversity. The project's landscaping plan would include the planting of 374 various tree species throughout the project site.

Source: City of Los Angeles 2019

GHG Emissions

Construction and operation of the project would generate GHG emissions. This analysis considers the combined impact of GHG emissions from both construction and operation. Calculations of CO_2, CH_4, and N_2O emissions are provided for informational purposes to identify the magnitude of project's emissions.

Construction Emissions

Construction facilitated by the project would generate temporary GHG emissions primarily from the operation of construction equipment on-site, as well as from vehicles transporting construction workers to and from the project site and heavy trucks to transport building, concrete, and asphalt materials. As shown in Table 21, construction associated with the project would generate 10,632 MT of CO_2e. Amortized over a 30-year period pursuant to SCAQMD guidance, construction associated with the project would generate 354 MT of CO_2e per year.

Table 18 Construction GHG Emissions

Year	Emissions (MT of CO_2e)
2024	263
2025	1,664
2026	1,725
2027	1,955
2028	2,190
2029	187
2030	1,260
2031	1,388
Total	**10,632**
Amortized over 30 years	**354**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: Table 2.1 "Overall Construction-Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards. No mitigation measures are required for this project. See CalEEMod worksheets in Appendix B.

Operational and Total Project Emissions

Operation of the project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, wastewater, solid waste generation, refrigerant, and stationary source. Annual operational emissions resulting from the project are summarized in Table 22. When combined with the amortized construction emissions, annual GHG emissions would be approximately 2,654 MT of CO_2e per year.

Table 19 Combined Annual Emissions

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**354**
Operational	**2,300**
Mobile	1,225
Area	8
Energy	798
Water	51
Waste	203
Refrigerant	<1
Stationary	15
Total	**2,654**

MT CO_2e = metric tons of carbon dioxide equivalent

[1] Amortized construction related GHG emissions over 30 years.

Source: Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards. See CalEEMod worksheets in Appendix B.

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

According to the L.A. CEQA Thresholds Guide, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;

- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

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. Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

Construction of the project would involve routine handling of small quantities of hazardous or potentially hazardous materials, such as gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles. This handling of hazardous materials would be a temporary activity and coincide with the short-term construction phase of the project. The transport, use, and storage of hazardous materials during the construction and operation of the project would be conducted in accordance with applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22.

Operation of the project as a residential and institutional development would not involve the routine transport, use or disposal of hazardous substances other than minor amounts typically used for maintenance and landscaping. Some medicines and medical supplies would also be used on-site, but of limited type and quantity, and to be administered by registered nurses. The State Medical Waste Management Act (MWMA) (22 CCR Sections 65600–65628) provides for regulation of medical waste generators, haulers, and treatment facilities. The MWMA defines medical waste as all of the following:

- Biohazardous waste, or “sharps” waste;
- Waste that is generated or produced as a result of the diagnosis, treatment, or immunization of human beings or animals, in related research, in the production or testing of biologicals, or in the accumulation of properly contained home-generated “sharps” waste;
- Trauma scene waste contaminated with human blood or other fluids, produced by an accident or illness.

The MWMA recognizes two separate types of generators, Small Quantity Generators (less than 200 pounds per month) and Large Quantity Generators (more than 200 pounds per month). Small Quantity Generators that treat their waste on-site and Large Quantity Generators must complete a Medical Waste Management Plan and register it with the local enforcement agency (the California Medical Waste Management Program). The project applicant would also be required to

dispose of medical waste through an authorized medical waste transporter (Section 118029 of the Health and Safety Code). It is unknown how much medical waste would be generated on-site; however, the project applicant would be required to comply with the MWMA to ensure proper handling and disposal of medical wastes. Impacts would be less than significant.

For the residential units within the eldercare facility, general household hazardous waste (HHW) generation would be expected. HHW includes used batteries, electronic waste, and other waste prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials and their disposal do not present a substantial health risk to the community. Regular operation and maintenance of residential units would not involve the use, storage, transport, or disposal of hazardous wastes and substances.

Compliance with applicable laws and regulations during construction and operation of the proposed project would eliminate impacts associated with the routine transport, use, and disposal of hazardous materials. Therefore, impacts would be less than significant.

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. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a foreseeable release of hazardous materials. Grading and construction activities could use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site preparation and building construction. However, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. No routine disposal of hazardous materials is proposed. Therefore, the project would not create a significant hazard to the public or the environment through a foreseeable upset or accident, or the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

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. Based upon criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

The Bishop Alemany High School campus is located approximately 0.4-mile southeast from the project site. However, the Bishop Alemany High School sports field is located on the south side of Mission Hills Road, directly across the street from the project site, approximately 50 feet away.

Though potentially hazardous materials such as fuels, lubricants, solvents, and oils could be used during demolition, construction, and operation of the proposed project, the transport, use, and storage of any and all hazardous materials would be conducted in accordance with all applicable State and federal lows, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Due to the non-hazardous nature of the proposed residential project and conformance with applicable regulations, impacts associated with hazardous emissions and hazardous materials near a school would be less than significant.

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. The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked for known hazardous materials contamination at the project site:

- Hazardous Waste and Substances site "Cortese" list (65962.5[a])
- GeoTracker: List of Leaking Underground Storage Tank Sites (65962.5[c][1])
- List of solid waste disposal sites identified by the Water Board (65962.5[c][2])
- List of "active" CDO and CAO sites (65962.5[c][3])

The project site is not listed on any of these databases, which were compiled pursuant to Government Code 65962.5 (CalEPA 2023a, 2023b; DTSC 2023; SWRCB 2023). Therefore, the project would not create a hazard to the public or the environment, and no impact would occur.

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 closest public airport to the project site is Whiteman Airport, which is approximately 3.0 miles southeast of the project site. The project site is not subject to hazards from this airport. The project site is not located within an airport influence area or an airport runway protection zone (County of Los Angeles 2023). Therefore, no impact related to airport safety would occur.

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

No Impact. Pursuant to the LAMC, construction activities that may temporarily restrict vehicular traffic would be required to implement measures to facilitate the passage of people and vehicles through or around any required road closures. Any road closures would have to be approved by the City Public Works Department and would have to conform to all applicable standards.

During construction, project site access would be required to comply with standards established by the City's Public Works Department. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to LAFD standards. Additionally, the project applicant would be required to conform to applicable Uniform Fire Code standards.

The submittal of plans in conformance with Uniform Fire Code standards would be a condition of project approval and compliance would be confirmed as part of the Building and Safety plan check process. As with any development, access to and through the residential area of the project applicant would be required to comply with required street widths as determined in the CBC, Master Plan of Streets, and the Uniform Fire Code. Therefore, implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The nearest disaster routes are I-5 and I-405, which are located approximately 0.2-mile southwest and approximately 0.2-mile southeast of the project site, respectively. The project would not require the closure of any public or private streets or impede emergency vehicle access to the project site or surrounding area. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the LAFD. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

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

Less than Significant Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. According to CalFire's Fire Hazard Severity Zones in State Responsibility Areas map, the project site is not located in a Very High Fire Severity Zone (CalFire 2023). The project would be designed and constructed in accordance with State and local Building and Fire Codes, including installing sprinklers and planting fire resistant landscaping, as appropriate, to reduce the potential for exposure of people or structures to wildfires to the maximum extent possible. It is possible that occupants of the project would be subject to poor air quality as a result of wildfires; however, these impacts can be mitigated by air filtration as required by local building codes. Therefore, the impact of the project in exposing people or structures to a risk of loss, injury, or death involving wildfires, would be less than significant.

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?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Less than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB). Temporary site preparation, grading, and paving activities associated with the project may result in soil erosion that could degrade water quality. The project applicant would be required to comply with the NPDES permitting system and the City's Stormwater and Urban

Runoff Pollution Control regulations (Ordinance Nos. 172,176 and 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. These ordinances contain requirements for construction activities and operation of projects to integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City's building plan review and approval process for individual construction projects. The LARWQCB adopted the latest Municipal Separate Storm Sewer System (MS4) NPDES Permit in December 2012. The MS4 permit requires new development and redevelopment projects to incorporate stormwater mitigation measures. Under the conditions of the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges to waters of the nation, develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the site SWPPP. The State permit prohibits the discharge of materials other than stormwater and prohibits all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4. The State permit also specifies that construction activities must meet applicable provisions of Sections 30 and 402 of the CWA. Conformance with Section 402 of the CWA would ensure that the project would not violate any water quality standards or waste discharge requirements. Similarly, compliance with construction related BMPs and/or the SWPPP would control and minimize erosion and siltation. Compliance with applicable state, regional, and City policies and regulations (e.g., NPDES General Construction Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the project's potential impacts related to surface runoff and water quality to less-than-significant levels.

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

A significant impact would occur if the project would substantially deplete groundwater or interferes with groundwater recharge. The project would not require the use of groundwater at the project site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the project would not require direct additions or withdrawals of groundwater, and the impact on groundwater supplies or groundwater recharge would be less than significant. Excavation to accommodate subterranean levels is not proposed at a depth that would result in the interception of existing aquifers or penetration of the existing water table. In addition, the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) contain requirements for construction activities and operation of development and redevelopment projects to integrate LID practices and standards for stormwater and to maximize open, green and pervious space on all developments and redevelopments consistent with the City's landscape ordinance and other related requirements in the City's Development BMPs Handbook. Conformance would be ensured during the permitting process with the Department of Building

and Safety. Therefore, the project would not impact groundwater supplies or groundwater recharge, and project impacts would be less than significant.

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

i) Result in substantial erosion or siltation on- or off-site;

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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. The project involves construction of a three-story lower campus with an underground parking garage and a four-story upper campus with both underground and ground level parking. The proposed project would not alter the course of any stream or other major natural drainage as there are none in the project vicinity. The proposed project would substantially increase the amount of impervious surface area on the project site; however, the project would install two stormwater cisterns to detain project runoff, which would be conveyed to an existing stormwater drain beneath Mission Hills Road. Therefore, the project would not result in flooding on- or off-site. In addition, project compliance with applicable State, regional, and City policies and regulations as described above under Threshold X (a) (e.g., NPDES General Construction Permit, NPDES Groundwater Discharge Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the project's potential impacts related to surface runoff to less than significant levels. Alterations to the existing drainage pattern would be less than significant and would not result in substantial erosion, siltation, polluted runoff, flooding on- or off-site, or exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

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

iv) Impede or redirect flood flows?

Less than Significant Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if:

- The project places housing in a 100-year flood zone; or
- The project is located within a 100-year flood zone, which would impede or redirect flood flows.

The project site is in Zone X of the FEMA Flood Insurance Rate Map (FIRM) (#06037C1075G; June 2, 2021) (FEMA 2001). Zone X is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance of a flood. In addition, Exhibit F of the City's Safety

Element, 100-Year & 500-Year Flood Plains, indicates that the project site is not within a 100- or 500-year flood plain area (City of Los Angeles 1996). Therefore, the proposed project would not have the potential to impede flood flows or place housing or structures in a 100-year flood hazard area, and there would be no impact.

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

No Impact. Although not specified in the L.A. CEQA Thresholds Guide, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the down slope movement of soil and/or rock under the influence of gravity. The project site and the surrounding areas are not located near a water body to be inundated by seiche. Although the project site is within a hillside area, the project site is not located in an area identified to have potential for seismic slope instability or in the path of any known or potential landslides. Therefore, the project would not be vulnerable to mudflow. Lastly, according to FEMA, the project site is not located within a flood zone. In conclusion, the project would have a less-than-significant impact related to the release of pollutants due to inundation by seiche, tsunami, mudflow, or floods.

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

Less than Significant Impact. A significant impact could occur if the project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan. Potential pollutants generated by the project would be typical of residential land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Implementation of the LID measures on the project site would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the project would not conflict with or obstruct any water quality control plan or sustainable groundwater management plan, including regulations governed by the LARWQCB, NPDES, the City's Stormwater and Urban Runoff Pollution Control, the City's LID, and the City's Standard Urban Stormwater Mitigation Plan (SUSMP). Impacts would be less than significant.

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

a) Physically divide an established community?

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

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

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

The project does not include the construction of any new roads, walls or additional features that could physically divide the established community. The project does not include the removal of any sidewalks and would not result in a less pedestrian friendly community. The project is in an urbanized area, surrounded by two single-family residences to the north, Bishop Alemany High School baseball/softball/soccer fields and a self-storage facility to the south, an assisted living facility and museum to the east, and Eden Memorial Park to the west. Once constructed, the expanded eldercare facility would be comparable to surrounding land uses; therefore, the project would not divide an established community. No impact would occur.

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

Less than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The site is located within the Mission Hills Community Plan Area. The entire project site is designated as Very Low Residential by the Community Plan and zoned for

Suburban Agriculture, Height District 1 (RA-1) in the northern portion of the site and Agriculture, Height District 1 (A2) in the southern portion of the site. The RA-1 zone permits one-family dwellings and allows for a maximum height of 36 feet for roofs with slopes of greater than 25 percent and 30 feet for roofs with slopes of less than 25 percent. The project applicant proposes a 61-unit apartment building and 40 townhouse units in four buildings, which is consistent with the RA-1 permitted uses. The A2 zone permits community centers and establishes a maximum height of 45-feet. The project applicant proposes a 51,000-sf skilled nursing facility and a 96,150-sf memory care and assisted living facility, which is consistent with the A2 permitted uses. Therefore, the project would conform to the allowable land uses pursuant to the LAMC. The decision makers will determine whether discretionary requests will conflict with applicable plans and/or policies. Impacts related to land use have been mitigated elsewhere or are addressed through compliance with existing regulations.

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?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. According to the L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance or is noted in the Conservation Element as being of local importance.

The project site is developed with two single-family residences and is not currently being used for the extraction of mineral resources. The project site is not located on a known mineral resource that would be of value to the region and residences of the state. The project site is not listed as a Mineral Resource Zone or Oil and Gas Resource on the City of Los Angeles General Plan Mineral Resources Map. Therefore, the project would not result in the loss of availability of any known regionally- or locally-valuable mineral resource, and no impact would occur.

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

Noise Background

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease. Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud as what is readily perceptible.

Sound changes occur in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result from simply the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to interior noise as well. The FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA, with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, academics and industry professionals have developed a variety of noise descriptors. One of the most frequently used noise metrics is the equivalent noise level (Leq); it considers both duration and sound power level. Leq is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time.

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. There is also the Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by Ldn and CNEL usually differ by about 1 dBA. The relationship between the peak-hour Leq value and the Ldn/CNEL depends on the distribution of traffic during the day, evening, and night).

Regulatory Framework

The goals, policies, and actions contained in the City of Los Angeles General Plan Noise Element focus on establishing and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receiver locations. In

support of these goals and policies, the City's Noise Element contains a land use and noise compatibility matrix (shown in Table 20) that determines the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses. According to the City's noise compatibility matrix shown in Table 20Table 20 Land Use Compatibility Standards (CNEL), ambient noise up to 60 CNEL is normally acceptable and noise up to 70 CNEL is conditionally acceptable for multi-family land uses. In addition, consistent with state noise insulation standards (California Building Code Title 24), the City's Noise Element limits interior noise to a maximum of 45 CNEL in any habitable room (City of Los Angeles 1999).

Table 20 Land Use Compatibility Standards (CNEL)

Land Use	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Single-Family, Duplex, Mobile Homes	50 – 55	55 – 70	70 – 75	75+
Multi-Family	50 – 60	60 – 70	70 – 75	75+
School, Library, Church, Hospital, Nursing Home	50 – 60	60 – 70	70 – 80	80+
Transient Lodging, Motel, Hotel	50 – 60	60 – 70	70 – 75	75+
Auditorium, Concert Hall, Amphitheater	–	50 – 65	–	65+
Sports Arena, Outdoor Spectator Sports	–	50 – 70	–	70+
Playground, Neighborhood Park	50 – 65	–	65 – 75	75+
Golf Course, Riding Stable, Water Recreation, Cemetery	50 – 70	–	70 – 75	75+
Office Building, Business, Commercial, Professional	50 – 65	65 – 75	75+	–
Agriculture, Industrial, Manufacturing, Utilities	50 – 70	70 – 75	75+	–

[1] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[2] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice.
[3] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[4] Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: City of Los Angeles 1999

City of Los Angeles Municipal Code

The City implements and enforces construction and operational noise regulations through the Los Angeles Municipal Code (LAMC). LAMC Section 111.03 establishes exterior noise standards, as shown in Table 21.

Table 21 City of Los Angeles Exterior Noise Standards

	Presumed Ambient Noise Levels (dB(A))[1]	
Zone	**Day**	**Night**
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50	40
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
M1, MR1, and MR2	60	55
M2 and M3	65	65

[1]Daytime levels are to be used from 7:00 a.m. to 10:00 p.m. and nighttime levels from 10:00 p.m. to 7:00 a.m.

LAMC Section 112.05 limits noise from construction equipment located within 500 feet of a residential zone to a maximum of 75 dBA between 7:00 a.m. and 10:00 p.m., as measured at a distance of 50 feet from the source, i.e., construction site, unless compliance is technically infeasible. Technical infeasibility means that noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of construction equipment. LAMC Section 41.40 also restricts construction activity to the hours below:

- Monday through Friday between 7:00 a.m. and 9:00 p.m.
- Saturdays and National Holidays between 8:00 a.m. and 6:00 p.m. except for individual homeowners engaged in the repair or construction of a single-family residence
- No construction on Sundays except for individual homeowners engaged in the repair or construction of a single-family residence

LAMC Section 112.02 prohibits the operation of air conditioning, refrigeration, heating, pumping, and filtering equipment associated with any residence or other structure from exceeding the ambient noise of any other occupied property by more than 5 dBA.

LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.

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

Less than Significant Impact.

Construction Noise

Based on LAMC Section 112.05, noise from construction equipment located within 500 feet of a residential zone should not exceed 75 dBA Lmax between 7:00 a.m. and 10:00 p.m., as measured at a distance of 50 feet from the source, unless compliance is technically infeasible. Based on LAMC Section 41.40, construction noise would also be significant if generated outside of allowable construction hours. Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006).

Construction activity would result in temporary noise in the project site vicinity, exposing surrounding nearby receivers to increased noise levels, but only during certain times of the day. Construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading) and would be lower during the later construction phases (i.e., building construction and paving). Typical heavy construction equipment during project grading would include dozers, loaders, graders, and dump trucks. It is assumed that diesel engines would power all construction equipment. However, construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour operating day.

Project construction would occur nearest to the Eden Memorial Park to the west, the Ararat Home Nursing Facility to the east, the single-family residence to the northwest, and the Bishop Alemany Softball and Soccer Field to the south. existing Ararat Homes east of the project site. Pursuant to LAMC Section 112.05, in which construction noise in a residential zone shall not exceed 75 dBA Lmax between 7:00 a.m. and 10:00 p.m. at a distance of 50 feet, construction noise was modeled at a distance of 50 feet from the nearest residential receivers. In addition, construction activities are limited to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and between the hours of 8:00 a.m. and 6:00 p.m. on Saturday pursuant to the City's Noise Ordinance Section 41.40.

A potential high-intensity construction scenario based on client provided information includes a dozer, grader and front-end loader working during grading to excavate and move soil. At a distance of 50 feet, a dozer, grader and front-end loader would generate a noise level of 85 dBA Lmax (RCNM calculations are included in Appendix G). Therefore, construction noise could exceed the threshold of 75 dBA Lmax. The approximate 75 dBA Lmax noise contour for project construction is estimated at 150 feet (i.e., if construction occurs at a distance of 150 feet or greater, it will not exceed the threshold). Therefore, if construction occurs within 150 feet of sensitive receivers, noise levels from construction may exceed the City's construction noise limit.

The nearest sensitive receivers include single family residences approximately 100 feet northwest of the project boundary. Other sensitive receivers include the Eden Memorial Park located immediately adjacent west of the project site, the Ararat Homes Nursing Facility located

approximately 90 feet east of the project boundary along Mission Hills Road, the Bishop Alemany Softball and Soccer Field located approximately 30 feet to the south of project boundary along Mission Hills Road. At these distances, construction noise could exceed the 75 dBA Lmax threshold since construction activity could occur within 150 feet of these sensitive receptors if uncontrolled. Construction noise at the Providence Holy Cross Medical Center, approximately 400 feet to the southeast of the project boundary, is not estimated to exceed the 75 dBA Lmax threshold.

However, the project applicant would be required to comply with RCM NOI-1, which instructs the project applicant to provide a Construction Noise Control Plan that would include a temporary noise barrier. To estimate the sound level reduction from a temporary noise barrier, the barrier is assumed to be constructed with a solid material that has a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. With these assumptions, the estimated noise reduction from a 10-foot temporary noise barrier which would block the line-of-sight between the equipment exhaust stacks and receptors to the north and east would be 15 dBA. With this reduction, noise levels at 50 feet would be approximately 71 dBA Lmax, which would not exceed the construction noise threshold of 75 dBA Lmax. Therefore, with implementation of RCM NOI-1, construction noise impacts would be less than significant.

On-site Operational Noise

The City has adopted noise standards in the LAMC that regulate operational noise sources in the City. The proposed project would result in a significant impact if project HVAC equipment (primary project stationary operational noise source) exceeds the LAMC standards shown in Table 21 by 5 dBA.

The proposed project would have heating, ventilation, and air conditioning systems (HVAC). Mechanical equipment is anticipated to be installed on the roof of the proposed mixed-use building. HVAC equipment typically generates noise levels of 72 dBA at a distance of 3 feet and would diminish at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from ground and shielding effects). The nearest sensitive receptor is Eden Memorial Park, which is approximately 80 feet from the nearest proposed project building. At this distance, HVAC noise would attenuate to approximately 43 dBA or less, which would not exceed the most stringent nighttime threshold of 40 dBA (presumed ambient) by more than 5 dBA. Project HVAC noise would be less at other nearby sensitive receptors, such as the residence to the north and the existing Ararat site to the east, which are further from proposed project buildings. This impact would be less than significant.

Off-site Traffic Noise

A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas. The following thresholds of significance similar to those recommended by the Federal Aviation Administration (FAA), are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increases the existing noise environment by the following:

- Greater than 1.5 dBA for ambient noise environments of 65 dBA CNEL and higher.
- Greater than 3 dBA for ambient noise environments of 60 to 64 CNEL.
- Greater than 5 dBA for ambient noise environments of less than 60 dBA CNEL.

Noise affecting the project site is primarily from traffic on Mission Hills Road. Project traffic noise was estimated using the project's daily trip generation estimated in the Updated Transportation Assessment (LADOT 2022). The assessment estimated daily vehicle trips at 1,181. NavigateLA provides observed daily traffic volume counts on Rinaldi Street east of Sepulveda of 30,803 (LADOT 2023). The addition of the project's 1,181 trips would result in a traffic increase of four percent, for an increase in noise level of 0.2 dBA. This would be well below the greater than 1.5 dBA traffic noise increase for areas exposed to noise levels 65 CNEL or higher. Therefore, the project's traffic noise increases would less than significant.

Land Use Compatibility

Noise level measurements contained in Appendix G were taken during the PM peak hour indicate ambient noise levels of approximately 66 dBA Leq at the project site along Ararat Homes site (Noise Measurement 1), 63 dBA Leq along Mission Hills Road (Noise Measurement 2), 68 dBA Leq along Rinaldi Street (Noise Measurement 3), and 65 dBA Leq along Indian Hills Road (Noise Measurement 4). Since the project site is located in an area where the main noise source is local traffic, the CNEL/Ldn is estimated to be roughly 2 dBA greater than the peak hour Leq (Caltrans 2013). Accordingly, ambient 24-hour noise levels at the project site range from approximately 65 to 70 CNEL at locations closest to Mission Hills Road. According to the City's noise compatibility matrix shown in Table 20, ambient noise up to 60 CNEL is normally acceptable and noise up to 70 CNEL is conditionally acceptable for nursing homes. Therefore, the project is anticipated to be within the "normally acceptable" range for nursing homes at distances further from Mission Hills Road and "conditionally acceptable" at distances closest to Mission Hills Road.

Operation of the proposed project would expose future residents to environmental noise. However, in the California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th 369, the California ruling that Supreme Court found that an agency is only required to analyze the potential impacts to future residents or users for certain schools projects, projects affected by airport noise, and projects that would exacerbate existing environmental hazards or conditions (i.e., projects that would have a significant operational impact). CEQA analysis is therefore concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents. Thus, bringing a new population into an area where noise currently exists is not a significant environmental impact under CEQA unless doing so would exacerbate noise conditions.

Regulatory Compliance Measure

NOI-1 **Construction Noise Reduction.** The construction contractor shall prepare and submit a Construction Noise Control Plan to Los Angeles Department of City Planning or designee for review and approval prior to issuance of a grading permit.

The Construction Noise Control Plan shall specify the noise reduction measures to be implemented during project construction when construction occurs within 150 feet of the nearest nearby sensitive receptors to the east, south, and north, which is the estimated distance where project construction may exceed 75 dBA Lmax. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans and shall be implemented by the construction contractor during construction. At a minimum, the Construction Noise Control Plan shall include the following measures:

- If construction is occurring within 150 feet of the sensitive receptors to the east, south, and north, installation of 10-foot high temporary sound barriers/blankets to between construction equipment and the sensitive uses. The barriers shall be at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. Alternately, if sound blankets are preferred, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.

- To the extent consistent with applicable safety regulations, trucks operating with reverse motions alarms shall be outfitted with SAE J994 Class D or equivalent alarms (ambient-adjusting, or “smart alarms” that automatically adjust the alarm to 5 dBA above the ambient near the operating equipment) or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

- A construction notification sign shall be posted at the job site, clearly visible to the public, which includes permitted construction days and hours, as well as the telephone numbers of the City and the contractor’s authorized representatives that are assigned to respond in the event of a noise complaint. If the authorized contractor’s representative receives a complaint, that person shall investigate, take appropriate corrective action, and report the action to the City.

Plan Requirements and Timing: The Los Angeles Department of City Planning or designee shall approve the Construction Noise Control Plan prior to issuance of a grading permit. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans Sound barrier and blankets and construction notification sign shall be installed on the project site prior to initiation of ground-disturbance activities and shall be maintained throughout the duration of construction. Reverse motions alarms and upgraded silencers shall be outfitted on construction vehicles and equipment throughout the duration of construction.

Monitoring: The City shall monitor compliance with the requirements of the Construction Noise Control Plan periodically during construction and shall promptly investigate and respond to all noise complaints.

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

Less than Significant Impact. The City has not adopted a threshold of significance to assess vibration impacts during construction and operation. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Based on the Caltrans criteria described above, construction vibration impacts would be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures, which is the limit where minor cosmetic (i.e., non-structural) damage may occur to residential buildings.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, are not proposed during implementation of the project. The greatest anticipated source of vibration during general project construction activities may be from a vibratory roller, which may be used within 30 feet of the nearest off-site sensitive receiver to the south. A vibratory roller would create approximately 0.21 In/sec PPV at a distance of 25 feet (Caltrans 2020). This would equal a vibration level of approximately 0.16 In/sec PPV. at a distance of 30 feet. This would not exceed the architectural damage criterion for residential structures of 0.2 In/sec PPV. Therefore, construction vibration impacts would be less than significant.

Operation of the project would not include any substantial vibration sources. Therefore, operational vibration impacts would be less than significant.

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 airport nearest to the project site, Whiteman Airport, is located approximately 2.8 miles to the southeast. The project would not be located within the noise contours of the airport (Los Angeles County Airport Land Use Commission 2004). Therefore, no substantial noise exposure from airport noise would occur to construction workers, users, or employees of the project, and no impacts would occur.

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

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

Less than Significant Impact. A significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude.

The City has a current (January 2023) population of 3,766,109 with an average household size of 2.53 persons (California Department of Finance 2023). The Southern California Association of Governments (SCAG) forecasts that the population of Los Angeles will grow to 4,771,300 by 2045, which is an increase of 1,005,191 (27 percent) relative to the 2016 population (SCAG 2020c). Assuming, conservatively, that all new residents would relocate to the project from outside the City, the project-generated increase of 586 residents (330 beds in the Lower Campus plus 2.53 persons per 101 units in the Upper Campus) would bring the total Los Angeles population to approximately 3,766,695. The Mission Hills Community Plan and the Framework Element of the City's General Plan only forecast population growth to 2010, but the increase in residential population resulting from the project is consistent within the SCAG 2045 population projections for the City; therefore, impacts would not be considered substantial. The project would meet housing needs for a growing senior population and would be consistent with regional and local policies that encourage the development of senior housing that is in proximity to social/health services, entertainment, and opportunities for community involvement (City of Los Angeles 1995a, SCAG 2020). Operation of the project would not induce substantial population growth in the project area, either directly or indirectly. The physical secondary or indirect impacts of population growth such as increased traffic or noise have been adequately analyzed in other portions of this document. Therefore, impacts would be less than significant.

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

Less than Significant Impact. A significant impact would occur if the proposed project would displace a substantial quantity of existing residences or a substantial number of people. The project would only displace two single family houses. The proposed project would add 101 new residential units and 330 new beds to the project site. Therefore, the project would not result in the displacement of a substantial number of existing people or housing. Impacts would be less than significant.

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?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less than Significant Impact. Based on the L.A. CEQA Thresholds Guide, a project would have a significant impact related to fire protection if it would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The LAFD provides fire protection and emergency medical services for the City. The closest fire station to the project site is LAFD Station 75, located at 15345 San Fernando Mission Boulevard. This station is 1.3 miles (driving distance) from the project site. LAFD Station 18 and 91 are also located approximately 3.7 miles northwest and approximately 3.4 miles northeast from the project site. The proposed project would add 101 new residential units and 330 new beds to the area would incrementally increase the service population of LAFD Station 75 and any responding station in the service area.

To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that the project is within an existing service area and there are existing fire stations (Fire Stations 75, 18, and 91) in proximity to the project site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve potential future development on the project site, or to maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The project would not create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for fire protection. In addition, LAFD would review the proposed site plan,

floor plans, and building plans prior to construction to ensure that required fire protection safety features, including building sprinklers and emergency access, comply with LAFD's requirements. Based on the foregoing, the project would receive adequate fire protection service and would not result in the need for new or physically altered protection facilities. Impacts to fire protection facilities would be less than significant.

b) Police protection?

Less than Significant Impact. Based on the L.A. CEQA Thresholds Guide the determination of whether the project results in a significant impact on police protection must be made considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available (consider, as applicable, scheduled improvements to LAPD services [facilities, equipment, and officers] and the project's proportional contribution to the demand); and
- Whether a project includes security and/or design features that would reduce the demand for police services.

The proposed project would be under the authority of the City of Los Angeles Police Department's (LAPD) Mission Community Police Station located at 11121 North Sepulveda Boulevard. This station is 0.6-mile southwest from the project site.

By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAPD can shift resources to meet local demands for police protection and emergency services. The project would not create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for police protection.

The proposed project would provide 101 residential units and 330 beds and would incrementally increase the service population for the Mission Community Police Station and any responding station in the service area. The project would also include exterior lighting for security purposes, which would promote safety and reduce the demand for police services. The proposed project could have a minor impact on police services in the area. Based on the foregoing, the project would receive adequate police protection service, and would not result in the need for new or physically altered fire protection facilities. Impacts on police protection facilities would therefore be less than significant.

c) Schools?

No Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The project site is located within the Los Angeles Unified

School District (LAUSD); however, the project involves development of a nursing home for elderly people and would not house school aged children. Therefore, this project would not result in increased enrollment for the schools serving the project site. Nevertheless, the project applicant would be required to pay the State-mandated school impact fees. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "… is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." No impacts to public schools would occur.

d) Parks?

Less than Significant Impact. A significant impact would occur if the project exceeded the capacity or capability of the local park system to serve the project. The City's Department of Recreation and Parks (LADRP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The proposed project is expected to add approximately 431 new residents to the area. The large unoccupied areas of the site would be used as revegetated open space. The project also includes private open space, courtyards, walking paths, exercise stations, and other on-site recreational areas. The increase in residents resulting from the project would incrementally increase the demand for parks and recreation facilities. Pursuant to Section 12.33 of the LAMC, the project applicant would pay the Dwelling Unit Construction Tax for construction of new dwelling units, which would offset the 431 new residents to the area. Therefore, the project would not create capacity or service level problems, substantially increase use of existing parks, or result in substantial physical impacts associated with the provision or new or altered parks facilities. Accordingly, impacts to park facilities would be less than significant.

e) Other public facilities?

Less than Significant Impact. A significant impact may occur if the project would result in substantial employment or population growth that could generate a demand for other public facilities, including libraries, which would exceed the capacity available to serve the project site, necessitating new or physically altered public facilities, the construction of which would have significant environmental impacts. The closest public libraries to the project site are the San Fernando Library (2.0 miles driving distance) and the Granada Hills Branch Library (3.6 miles driving distance). The project would result in 431 new residents, which could result in increased demand for library services and resources of the Los Angeles Public Library (LAPL) System. While the increase in population as a result of the proposed project may create a demand for other public facilities, the project would not create substantial capacity or service level problems that would require the provision of new or physically altered public facilities in order to maintain an acceptable level of other government services. Therefore, impacts would be less than significant.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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 include substantial employment or population growth, which could generate an increased demand for parks or recreational facilities that would exceed the capacity of existing parks and cause premature deterioration of the park facilities; or
- Includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment.

As identified by LADRP, the City's parks system consists of approximately 16,000 acres of parklands (City of Los Angeles 2023b). The closest parks to the project site are Carey Ranch Park (located 0.4-mile to the northeast of the project site), Van Norman Lakes Reservoir (located 1.0 miles southwest of the project site), Brand Park (located 0.6-mile southeast of the project site), and Fox and Laurel Park (1.1 miles southeast of the project site). The City's current (January 2023) population is estimated at 3,766,109 people (California Department of Finance 2023). Consequently, there are about 4.0 acres of parkland for every 1,000 residents and the City currently meets the standard ratio for parkland in the Quimby Act (California Department of Parks and Recreation 2002). The project may increase the use of existing neighborhood and regional parks but would not result in a substantial decrease in the parkland to resident ratio. Therefore, impacts would be less than significant.

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. A significant impact would occur if the project included recreational facilities or required the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The LADRP is responsible for the

provision, maintenance, and operation of public recreational and park facilities and services in the City. The project would result in the construction of 101 new residential units (townhomes and apartments) and 330 new assisted living, memory care, and in-patient beds. The large unoccupied areas of the site would be landscaped and kept as open space, and common open space near the proposed buildings includes courtyards, walking paths, exercise stations, benches, and other recreational activities, which would cover 59.4 percent of the site. The project-required open space would not adversely affect the environment. Furthermore, the project would not create capacity or service level problems or result in substantial physical impacts associated with the provision or new or altered parks facilities. As such, impacts to recreational facilities would be less than significant.

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, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

Less than Significant Impact. A significant may occur if the project conflicts with an applicable plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, or pedestrian facilities. According to LADOT Transportation Assessment Guidelines (TAG), "the City of Los Angeles has adopted programs, plans, ordinances and policies that establish the transportation planning regulatory framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users". The TAG Table 2.1-1 lists all policies that should be reviewed as part of the analysis to identify any potential conflicts with the proposed project. The TAG also provides a list of questions in Table 2.1-2 to guide the review of the documents in Table 2.1-1.

Table 22 Questions to Determine Project Applicability to Plans, Policies, and Programs

Guiding Questions	Relevant Plans, Policies, and Programs	Supporting/Complementary City Plans, Policies, and Programs to Consult	Project
	Existing Plan Applicability		
Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone? (screening question)	LAMC Section 12.37		No
Is project site along any network identified in the City's Mobility Plan?	MP 2.3 through 2.7		No
Are dedications or improvements needed to serve long-term mobility	MP - Street Classifications; MP -	MP - 2.17 Street Widenings	If needed, project

Guiding Questions	Relevant Plans, Policies, and Programs	Supporting/Complementary City Plans, Policies, and Programs to Consult	Project
needs identified in the Mobility Plan 2035?	Street Designations and Standard Roadway Dimensions		would comply
Does the project require placement of transit furniture in accordance with City's Coordinated Street Furniture and Bus Bench Program?			No
Is project site in an identified Transit Oriented Community (TOC)?	MP - TEN; MP - PED; MP - BEN; TOC Guidelines		No
Is project site on a roadway identified in City's High Injury Network?	Vision Zero	Mobility Plan 2035	No
Does project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	MP - 2.1 Adaptive Reuse of Streets; MP - 2.10 Loading Areas; MP - 3.5 Multi-Modal Features; MP - 3.8 Bicycle Parking; MP - 4.13 Parking and Land Use Management; MP - 5.4 Clean Fuels and Vehicles	MP - 2.3 Pedestrian Infrastructure; MP - 2.4 Neighborhood Enhanced Network; MP - 3.2 People with Disabilities; MP - 4.1 New Technologies; MP 5.1 Sustainable Transportation; MP - 5.5 Green Streets	No
Does project propose narrowing or shifting existing sidewalk placement?	MP 2.3 Pedestrian Infrastructure; MP 3.1 - Access for All; MP -PED; MP - ENG 19; MP 2.17 Street Widenings	Healthy LA; Vision Zero; Sustainability Plan	No
Does project propose paving, narrowing, shifting or removing an existing parkway?	MP - 5.5 Green Streets; Sustainability Plan		No
Does project propose modifying, removing or otherwise affect existing bicycle infrastructure? (ex: driveway proposed along street with bicycle facility)	MP - BEN; MP - 4.15 Public Hearing Process	Vision Zero	No
Is project site adjacent to an alley? If yes, will project make use of, modify, or restrict alley access?	MP - 3.9 Increased Network Access; MP - ENG.9; MP - PL.1; MP - PL.13; MP - PS.3		No
Does project create a cul-de-sac or is project site located adjacent to existing cul-de-sac? If yes, is cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	MP - 3.10 Cul-de-sacs		No
	Access: Driveway and Loading		
Does project site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	MP - PL.1; MP - PK.10, CDG 4.1.02	Vision Zero	No

Guiding Questions	Relevant Plans, Policies, and Programs	Supporting/Complementary City Plans, Policies, and Programs to Consult	Project
If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	MP - PL.1; MPP 321	Vision Zero	N/A
Does project site include a corner lot? (avoid driveways too close to intersections)	CDG 4.1.01		No
Does project propose driveway width in excess of City standard?	MPP Sec. 321	Vision Zero, Sustainability plan MP - PED, MP - BEN CDG 4.1.04	No
Does project propose more driveways than required by City maximum standard?	MPP - Sec No. 321 Driveway Design	Vision Zero, MP, Healthy LA	No
Are loading zones proposed as a part of the project?	MP - 2.10 Loading Areas; MP - PK.1; MP - PK.7; MP - PK.8; MPP 321		No
Does project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	MP - 2.10 Loading Areas		Yes, Onsite
Does project propose modifying, limiting/ restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way?)	MP - 2.3 Pedestrian Infrastructure; MP - 3.9 Increased Network Access		No

Because the project is consistent with each of the City documents listed in Table 2.1-1 of the TAG, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.

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

Less than Significant Impact. Generally, VMT is the most appropriate measure of transportation impacts; VMT refers to the amount and distance of automobile travel attributable to a project. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. The LADOT TAG establishes analysis methods and impact significance criteria to apply in the analysis of VMT effects associated with new land use projects. The TAG states that a transportation assessment is required under the following circumstances:

- If the Development Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action,
- If a Transportation Project is likely to either:
  1. induce additional vehicle miles traveled by increasing vehicle capacity; or
  2. reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24hour period after the project is completed, a transportation assessment is generally required.
- If a transportation assessment is required by City ordinance or regulation.

A trip generation analysis was conducted to determine if the project would exceed the net 250 daily vehicle trips screening threshold. Using the City VMT Calculator tool Version 1.3, which

draws upon trip rate estimates published in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition as well as applying trip generation adjustments when applicable. This trip generation adjustment is based on sociodemographic data and the built environment factors of the project's surroundings. It was determined that the project does exceed the net 250 daily vehicle trips threshold with a total of 1,181 daily vehicle trips. Therefore, further transportation assessment was required.

On August 21, 2021, LADOT issued a revised transportation assessment letter prepared by Jano Baghdanian & Associates, dated June 16, 2021, which is included as Appendix H2 in this IS-MND. Since the letter was issued to the Department of City Planning, the project has modified the scope of work and a Supplemental Transportation analysis was prepared and submitted by Jano Baghdanian & Associates, dated January 13, 2022. LADOT provided an updated transportation assessment letter, dated January 28, 2002, which is included as Appendix H3 in this IS-MND. As described in Appendix H3, the new LADOT Transportation Assessment Guidelines (TAG) provide instructions on preparing transportation assessments for land use proposals and define the significant impact thresholds. The LADOT VMT Calculator tool measures project impact in terms of Household VMT per Capita, and Work VMT per Employee. LADOT identified distinct thresholds for significant VMT impacts. or each of the seven Area Planning Commission (APC) areas in the City. For the North Valley APC area, in which the project is located, the following thresholds have been established:

- Daily Household VMT per Capita: 9.2
- Daily Work VMT per Employee: 15.0

Based on the TIA conducted for the project, the project would generate 10,430 daily VMT and an average VMT per capita of 7.8, which does not exceed the North Valley APC impact threshold of 9.2. Therefore, the project would not result in a significant VMT impact. Additionally, based on the estimate of 70 employee population, the project would generate work VMT per employee of 13.1, which is less than the North Valley APC impact threshold of 15.0 and, therefore, would not result in a significant VMT impact. Furthermore, the project applicant proposed to incorporate the Travel Demand Management (TDM) strategy of bike parking per LAMC as a project design feature.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. A significant impact would occur if the proposed project would substantially increase an existing hazardous design feature or introduce incompatible uses to the existing traffic pattern. The proposed project would not alter or affect the existing street and intersection networks in its vicinity. The project would be accessible by two driveways for ingress and egress from Mission Hills Road. Project design would be subject to review by the LAFD to ensure site access safety and consistency with design standards. Therefore, the project would not substantially increase hazards due to a geometric design feature.

d) Result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if the project design threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. Updates to the City of Los Angeles Safety Element were adopted in November 2021. The Safety Element references the City's Emergency Management Department 2018 Local Hazard Mitigation Plan (LHMP). The LHMP identifies Critical Facilities and Infrastructure including critical response facilities and critical infrastructure (transportation and utilities). Due to the sensitivity of this information, a detailed list of facilities is not provided therein. Based on the available information, the proposed project would not impair or physically interfere with an adopted emergency response or emergency evacuation plan. Additionally, emergency access to and from the project site would be provided in accordance with requirements of the LAFD. Therefore, there is no information to indicate that the proposed project would result in inadequate emergency access or interfere with an emergency response plan or emergency evacuation plan. Therefore, less than significant impacts would occur.

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	☐	☒	☐	☐
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.	☐	☒	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. 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
2. 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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

AB 52 CONSULTATION

Assembly Bill 52 (AB52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agency must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in a near the project site.

On July 6, 2023, an informational letter was mailed to a total of 10 Tribes known to have resources in this area describing the project and requesting any information regarding resources that may exist on or near the projects site.

On July 11, 2023, The Department of City Planning received a response from the Gabrieleno Band of Mission Indians – Kizh Nation requesting an AB 52 consultation. On August 24 2023, the Tribe stated that they would defer to the Gabrieleno Band of Mission Indians – Kizh Nation to the Fernandeno Tataviam Band of Mission Indians. On October 16, 2023, the Tribe stated in an email they would not need to review the mitigation measures as they had deferred to another Tribe and consultation was thus concluded with the Gabrieleno Band of Mission Indians.

On July 12, 2023, a response was received from Fernandeno Tataviam Band of Mission Indians requesting consultation. Consultation began on August 31, 2023. The Fernando Tataviam Band of Mission Indians provided substantial evidence of tribal activity in the area, all of which is confidential in nature, and it has been determined that archeological and tribal monitors are in appropriate mitigation to avoid significant impacts. On Thursday, October 12, 2023, the Fernando Tataviam Band of Mission Indians and staff from the City of Los Angeles acknowledged conclusion of consultation pursuant to AB 52 for the project located at 15149, 15151 and 16155 Mission Hills Road and agreed to apply the Mitigation Measures provided by the Tribe.

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 with Mitigation Incorporated. According to background research discussed in Section V, *Cultural Resources*, one potential historical resource, Eden Memorial Park Cemetery, was identified, which is located adjacent (to the west) of the project site; however, the property that encompasses the potential historical resource is expansive and its overall setting would not be significantly altered by the proposed project. No tribal cultural resource was found on the project site based on background research or the pedestrian survey on the project site. Therefore, impacts to tribal cultural resources would be less than significant. Although it is not anticipated that intact tribal cultural resources are present on the project site, the potential for the recovery of buried tribal cultural resources during project construction activities cannot be completely ruled out. Mitigation Measures TCR-1 and TCR-4 would address potentially significant impacts relating to the unanticipated discovery of tribal cultural resources during project construction. With adherence to Mitigation Measures TCR-1 through TCR-4, impacts would be less than significant with mitigation.

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. As discussed in Section V, *Cultural Resources*, there is no evidence that archaeological resources are present on-site. Rincon conducted a cultural resources records search for the project site, which indicated that there are no known cultural resources on the project site. Although it is not anticipated that intact tribal cultural resources are present on the project site, the potential for the recovery of buried tribal cultural resources during project construction activities cannot be completely ruled out. Mitigation Measures TCR-1 and TCR-4 would address potentially significant impacts relating to the unanticipated discovery of tribal cultural resources during project construction. With adherence to Mitigation Measures TCR-1 through TCR-4, impacts would be less than significant with mitigation.

Mitigation Measures

TCR-1 **Treatment and Disposition Plan**. A Treatment and Disposition Plan (TDP) shall be prepared, in consultation with the Fernandeño Tatavian Band of Mission Indians, prior to the commencement of any all and ground-disturbing activities for the project, including any archaeological testing. The TDP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. Inadvertent

discovery of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Tribe(s), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

TCR-2 **Tribal Cultural Resources Monitoring**. Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain one or more professional tribal monitors procured by the Fernandeño Tataviam Band of Mission Indians. The number of Tribal Monitors will be determined by the following conditions: one Tribal Monitor shall be assigned to each simultaneously occurring ground-disturbing activity. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor(s) to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by Client, in writing, upon completion of each set of scheduled activities and 5 days' notice (if possible) shall be submitted to the Tribe by project applicant, in writing, prior to the start of each set of scheduled activities.

TCR-3 **Unanticipated Discovery of Tribal Cultural Resources.** If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards retained by the project applicant as well as the Tribal Monitor shall assess the find.

TCR-4 **Consultation with FTBMI.** The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

Significance After Mitigation

Mitigation Measures TCR-1 through TCR-4 would reduce tribal cultural resources impacts to a less-than-significant level.

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?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

As detailed below in response to Threshold XIX(b), sufficient water supplies would be available to serve the project and no new off-site lines would be required. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP

and LAFD, respectively, under their own independent environmental analysis. The project would require construction of new, on-site water distribution lines to serve the new memory care and assisted living facility, skilled nursing facility, apartment building, and four townhome buildings. 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. Prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and including offsite connection to existing water lines. Therefore, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts related to the construction of new water facilities would be less than significant.

Wastewater

Less than Significant Impact. The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and commercial customers within a 600-square mile service area that includes Los Angeles and 29 contracting cities and agencies (LASAN 2023a). As detailed below in response to Threshold XIX(c), the project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the project. Accordingly, it is not anticipated that the project would require the construction of new wastewater treatment facilities. During construction of the project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from project construction activities is not anticipated to cause any increase in wastewater flows. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and 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. Although no upgrades to the public main are anticipated, minor off-site work along the Project frontage would be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. Therefore, the construction of new wastewater facilities would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this IS-MND. Accordingly, impacts related to the construction of new wastewater facilities would be less than significant.

Stormwater Drainage

Less than Significant Impact. The proposed project would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well LID requirements which would apply to the construction and operation of the proposed project to further reduce storm water runoff. Compliance with these requirements would reduce potential impacts to local storm water drainage facilities to a less-than-significant level.

Electric Power

Less than Significant Impact. The LADWP would supply the project from the existing electrical system. However, the project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. All electrical facility installation and connection to the existing system would be done in coordination and under approval of the LADWP. Electricity demand during construction 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. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. As detailed in Threshold VI(a), the estimated electricity demand of the project during operation would represent a nominal percentage of the LADWP's projected annual sales. Furthermore, as discussed in response to Threshold VI(a), the incorporation of the 2022 Title 24 energy conservation standards into the project would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including electricity. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the project's electricity demand. Based on the above, the construction of new on-site electric power distribution facilities would not result in significant environmental effects and the expansion of off-site electric power sources would not be required. Accordingly, impacts would be less than significant.

Natural Gas

Less than Significant Impact. SoCalGas would supply the project from existing natural gas facilities. Construction activities typically do not involve the consumption of natural gas. Accordingly, construction of the project would not require the installation of natural gas facilities. As detailed in Section VI, *Energy*, the project's operational natural gas demand would represent an insignificant percentage of SoCalGas' available supplies and would not require new or expanded sources of natural gas. Therefore, the construction of new natural gas facilities would not result in significant environmental effects. Accordingly, impacts to natural gas facilities would be less than significant.

Telecommunications

Less than Significant Impact. Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Accordingly, impacts to telecommunication facilities would be less than significant.

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 would increase water consumption to such a degree that new water sources would need to be identified. The Los Angeles Department of Water and Power (LADWP) supplies water within the City limits. The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. In accordance with LAMC Sections 122.00 – 122.10 and the City's Green Building Code Section 99.4.303, the project would be required to implement water saving features to reduce the amount of water used by the project including high-efficiency toilets, low-flow showerheads and faucets, high-efficiency clothes washers, and high-efficiency dish washers. All fixtures would be required to meet applicable flush volumes and flow rates. The project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. Accounting for compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, the CalEEMod outputs prepared for the project (see Appendix B of this IS-MND) estimated that the project would have an annual water demand of 17.4 million gallons per year (53.5 acre-feet per year [AFY]).

LADWP's 2020 Urban Water Management Plan (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage in the 1970s.The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in Table 23.

Table 23 LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
Average Years						

Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

Source: LADWP, 2020 Urban Water Management Plan (UWMP), Exhibits ES-R, ES-S, and ES-T

As shown in Table 23, annual water demand within the City is projected to increase over the planning period by between 67,200 AFY and 72,000 AFY. The project's estimated 53.5 AFY demand would represent 0.08 percent of the projected increase in annual water demand of 67,200 AFY from 2025 to 2045. Moreover, as also shown in Table 23, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions.

As detailed in Threshold XIV, *Population and Housing*, the project's population growth would be consistent with the forecasted population growth for the City by 2045. Accordingly, the project's estimated water demand has been accounted for within LADWP's projections and would not exceed the water demand estimates of the 2020 UWMP. As such, the project would have sufficient water supplies available to serve the project and reasonably near future development during normal, dry, and multiple-dry years. Therefore, impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. LASAN provides wastewater service to the project site. Wastewater from the project site would be conveyed from the project site via the City's existing wastewater infrastructure to the HWRP. The HWRP treats an average daily flow of 275 million gallons per day (mgd) in dry weather (LASAN 2023b). Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry

and wet weather days, with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (LASAN 2023b). This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. According to the CalEEMod outputs prepared for the project (see Appendix B), the project's indoor water demand would be approximately 11.7 million gallons per year, or approximately 32,066 gallons per day. Assuming that 100 percent of the project's indoor water demand would subsequently be treated as wastewater, the project's wastewater generation would account for 0.02 percent of the remaining daily capacity at the HWRP. As such, the project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the project's projected demand in addition to existing commitments. Therefore, impacts would be less than significant.

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. LASAN manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's authority and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste108 such as construction and demolition (C&D) waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. The County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ClWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent 2021 CIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 137.09 million tons as of December 2022. Most commonly, solid waste collected within the City is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day and based on its average daily intake of 6,919 tons per day, has capacity for an additional 5,181 tons per day. The 2021 ClWMP estimates that it has a remaining capacity of 52.22 million tons and a remaining life of 16 years. The Azusa Land Reclamation facility is the only permitted inert waste landfill in the County that has a full solid waste facility permit; the landfill had 50.77 million tons of remaining capacity and an average daily disposal rate of 1,275 tons per day as of December 2021.

Under State law (AB 939, as amended by AB 341), jurisdictions are currently required to meet a solid waste diversion goal of 75 percent. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching "zero waste." The goal of zero waste, as defined by the RENEW LA Plan, is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a zero waste city by 2030.To this end, the City of Los Angeles implements a number of source

reduction and recycling programs such as curbside recycling, home composting demonstration programs, and C&D waste recycling (also required by SB 1374). Using calculation methodology adopted by the state, the City achieved a 76.4 percent diversion rate by 2012.

Construction

Construction debris would consist primarily of debris from the demolition of two residences. Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the project is estimated to generate a total of approximately 650 tons of solid waste, and approximately 113 tons of demolition debris, for a total construction waste of 763 tons (EPA 2009).

Pursuant to the requirements of the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181519), all haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling, and transporting C&D waste, which can only be taken to City-certified C&D processing facilities. In accordance with the requirements of AB 939 and SB 1374, which mandate diversion of construction and demolition waste through salvaging, recycling, and reuse, it is assumed that 75 percent of the project's construction waste would be diverted from disposal. Accordingly, the project would result in 763 tons of construction waste that would require disposal at an inert waste landfill. Based on Azusa Land Reclamation's 58.84 million tons of remaining capacity, there would be sufficient capacity to serve the construction waste disposal needs of the project. In addition, the project would require a total of 2,800 cy of soil export for disposal. Based on Sunshine Canyon's 59.16 million tons of remaining capacity, there would be sufficient capacity to serve the soil export disposal needs of the project. Based on the available capacity and the required diversion requirements, construction of the project would not 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. Therefore, impacts would be less than significant.

Operation

As previously detailed, AB 939/AB 341 requires the City to divert 75 percent of solid waste generated within the City from landfill disposal. The City's RENEW LA Plan has also set a goal of 90 percent diversion by 2025 and zero waste by 2030. In order to meet diversion requirements and achieve increased diversion goals, the City implements programs that would be implemented at the project site such as separate curbside recycling and yard waste/composting bins. Accounting for mandatory recycling and composting that would be provided to project employees through the City's waste hauling service, CalEEMod outputs prepared for the project (see Appendix B), estimate that the anticipated total solid waste generation for the project would be to 650 tons of solid waste per year (1.78 tons per day) that would require disposal at a Class III landfill. Based on Sunshine Canyon Landfill's permitted daily capacity of 12,100 tons per day, remaining daily capacity of 5,181 tons per day, remaining permitted capacity of 59.16 million tons, and remaining lifetime of 18 years, there would be sufficient capacity to serve the disposal needs of the project. Based on the available capacity and the required diversion requirements, operation of the project would not 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. Therefore, impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact may occur if the project would conflict with any statutes and regulations governing solid waste. LASAN and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the project site. The entire Southern California region is served by an extensive network of landfills and other waste disposal methods. Although the project proposes to intensify the existing residential use on the subject property, it is unlikely to generate such a substantial increase in waste that would exceed the capacity of the existing waste disposal system. The project will comply with all applicable federal, State, and local regulations involving solid waste. Therefore, the project would have a less-than-significant impact on statutes and regulations governing solid waste.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The project site is not located in or near State Responsibility Areas (SRA) or lands within a Very High Fire Hazard Severity Zone (CalFire 2023). The nearest Very High Fire Hazard Severity Zone is located more than 2.0 miles southeast from the project site; therefore, the project would not exacerbate wildfire hazard risks or expose people or the environment to adverse environmental effects related to wildfires. As such, no impact would occur.

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?	☐	☒	☐	☐
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)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant with Mitigation Incorporated. As discussed in Section V, *Cultural Resources*, the project site does not contain any known historical or archaeological or tribal cultural resources. As a result, the proposed project would not eliminate an important example of major periods of California history or prehistory. Nonetheless, mitigation is proposed to help reduce potential impacts, such as accidental discovery.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact. As described in the discussion of environmental checklist Sections I through XX, with respect to all environmental issues, the proposed project would not result in significant and unmitigable impacts to the environment. All anticipated impacts associated with the proposed project would be less than significant. This is largely due to the fact that project construction activities would be temporary, infrequent, and low-intensity and would not significantly alter the environmental baseline condition.

Cumulative impacts could occur if the construction of other projects occurs at the same time as the proposed project and in the same geographic scope, such that the effects of similar impacts of multiple projects combine to create greater levels of impact than would occur at the project-level. For example, if the construction of other projects in the area occurs at the same time as project activities, combined air quality and noise impacts may be greater than at the project-level but would not create a potentially significant impact.

Implementation timing of other similar style projects is not known; therefore, it is possible that implementation of these projects and the proposed project may overlap. To be specific, no other probable future projects within 0.5 mile of the project site are known at this time.

With that said, project impacts are primarily temporary, localized effects, which would occur during project construction. Therefore, the potential for the project to contribute to cumulative impacts would be limited to the infrequent periods of project activities for the following issue areas, which would not include all environmental issues analyzed above:

- **Air Quality**. Air pollution may combine with other cumulative projects (past, present, and reasonably near future) to violate criteria pollutant standards if the existing background sources cause nonattainment conditions. Air districts manage attainment of the criteria pollutant standards by adopting rules, regulations, and attainment plans, which comprise a multifaceted programmatic approach to such attainment. The SCAQMD's thresholds are designed such that the implementation of individual projects would not create an exceedance of or exacerbate an existing exceedance of State and Federal AQMP's. Therefore, a project's cumulative impacts are determined by the same thresholds as a project's individual significance. The proposed project consists of a lower campus with a memory care and assisted living building and skilled nursing facility totaling 330 beds and an upper campus with 40 townhomes and 61 apartment units. The proposed project would be consistent with the AQMP growth forecast, regional and localized air quality thresholds, and result in less than significant impact to sensitive receptors to criteria pollutants, TAC, and odors. Therefore, the proposed project's contribution to cumulative air quality impacts would not be cumulatively considerable.

- **Biological Resources**. If the proposed project and other planned residential projects in nearby neighborhoods are constructed during the bird nesting season, these projects could result in cumulative impacts to special status bird species and nesting birds within the vicinity of project site. However, all projects, including the proposed project, would be required to adhere to the provisions of the MBTA and CFGC related to the protection of nesting birds. In addition, many of the planned residential projects would occur in currently developed areas with low potential for sensitive biological resources to be present, and all projects would be required to comply with the biological resources policies and standards of the City's General Plan and LAMC, which would minimize the potential for these projects to result in cumulative impacts to special status species, wetlands, wildlife movement, and biological resources protected by local policies and ordinances. Furthermore, the proposed project was found to have no impacts related to sensitive natural communities, riparian habitat, and adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plan and therefore would not combine with other projects to result in cumulative impacts to these resources.

- **Greenhouse Gas Emissions**. GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to climate. The vast majority of projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change; therefore, the issue of climate change for the proposed project involved an analysis of whether a project's contribution toward an impact is cumulatively considerable. The proposed project would not exceed SCAQMD's recommended interim GHG threshold that would capture 90 percent of GHG emission from the residential and commercial sectors for all new development projects. The proposed residential care and nursing facility would be designed to be energy efficient and meet Title 24 requirements. Therefore, the proposed project's contribution to cumulative GHG emissions would not be cumulatively considerable.

- **Hazards and Hazardous Materials**. Similar to the proposed project, cumulative development projects in the local neighborhoods would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials, and compliance with applicable regulations would reduce potential cumulative impacts to less-than-significant levels. With respect to the use and accidental release of hazardous materials in the environment at construction sites and the inadvertent mobilization of existing hazardous contaminants from construction activities, effects are generally limited to site-specific conditions. Therefore, there would be no cumulative impact related to accidental release of hazardous materials.

- **Noise**. Overlapping construction activities associated with cumulative development projects in the local neighborhoods in conjunction with proposed project activities could result in cumulative noise impacts related to a temporary increase in ambient noise levels at the same noise-sensitive residences located throughout the area, especially during construction activities. However, as discussed in Section XIII, *Noise*, the proposed project would not result in temporary noise levels in excess of the daytime construction noise threshold, and

residential projects typically do not involve highly intensive construction activities with simultaneous operation of multiple pieces of heavy-duty construction equipment that generate significant levels of noise. Therefore, no cumulative construction noise impact would occur.

Given the above discussion, the proposed project would not result in a cumulatively considerable contribution to a significant cumulative impact.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. The project would not conflict with or obstruct implementation of the SCAQMD's AQMP and would not expose human beings to substantial air pollutant emissions in excess of SCAQMD regional and localized significance thresholds. As discussed in Section IX, *Hazards and Hazardous Materials*, compliance with federal, State, and local laws regulating the transportation of hazardous materials would prevent the accidental release of hazardous materials during construction, and the project would not involve the use of hazardous materials during operation. As discussed in Section XIII, *Noise*, project construction noise would not the threshold of significance, and operation of the reservoirs would not involve noise-generating components. Therefore, the project would not adversely affect human beings, directly or indirectly, and impacts would be less than significant.

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6 REFERENCES

Association of Environmental Professionals (AEP). 2016. Final White Paper Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. October. https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf (accessed April 2022).

California Air Resources Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. https://www.arb.ca.gov/ch/handbook.pdf (accessed May 2022).

____. 2022. Maps of State and Federal Area Designation. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations (accessed May 2022).

____.2023a. Top 4 Summary: Select Pollutant, Years, & Area. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed May 2022).

____.2023b *AQMIS* Air Quality Data (PST) Query Tool. Available: https://www.arb.ca.gov/aqmis2/aqdselect.php?tab=specialrpt. Accessed May 2022.

California Department of Conservation. 2017. State of California Williamson Act Contract Land. https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf (accessed August 2023).

_____. 2023a. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed August 2023).

_____. 2023b. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/eqzapp/app/ (accessed August 2023).

California Department of Finance. 2023. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/ (accessed August 2023).

California Department of Forestry and Fire Protection (CalFire). 2023. Fire Hazard Severity Zones in State Responsibility Area. June 15, 2023. https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/ (accessed August 2023).

California Department of Toxic Substances Control (DTSC). 2023. Hazardous Waste and Substances Site List.

https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST (accessed August 2023).

California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. (CT-HWANP-RT-13-069.25.2) September. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf (accessed September 2023).

_____. 2017. *2017 Traffic Volumes*. https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-280-405 (accessed September 2023).

_____. 2020. Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdfCrocker, Malcolm J. (Editor). 2007. Handbook of Noise and Vibration Control Book, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

California Energy Commission (CEC). 2023a "Total System Electric Generation". [webpage]. N.d. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation (accessed June 2023).

_____. 2023b. "Supply and Demand of Natural Gas in California". https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california#:~:text=Nearly%2045%20percent%20of%20the,90%20percent%20of%20its%20natural (accessed June 2023).

_____. 2023c. "California Energy Consumption Database". http://ecdms.energy.ca.gov/Default.aspx (accessed June 2023).

_____. 2023d. "California Retail Fuel Outlet Annual Reporting (CEC-A15) Results. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting (accessed June 2023).

_____. 2023a. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf (accessed August 2023).

_____. 2023b. List of "active" CDO and CAO from Water Board. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx (accessed August 2023).

California Natural Resource Agency. 2019. California's Fourth Climate Change Assessment Statewide Summary Report. http://www.climateassessment.ca.gov/state/ (accessed May 2022).

Cornell Lab of Ornithology. 2018. California Towhee Life History. Accessed April 2018 at: https://www.allaboutbirds.org/guide/California_Towhee/lifehistory

Environmental Protection Agency (EPA). 2009. Estimating 2003 Building-Related Construction and Demolition Materials Amounts. https://www.epa.gov/sites/default/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf (accessed October 2023).

Federal Emergency Management Agency (FEMA). 2001. Flood Insurance Rate Map (FIRM) #06037C1075G. June 2, 2021. https://msc.fema.gov/portal/home (accessed September 2023).

Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/.

_____. 2011. Highway Traffic Noise Analysis and Abatement Policy and Guidance. (FHWA-HEP-10-025). December.

_____. 2017. Special Report – Measurement, Prediction, and Mitigation. June.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed September 2023).

Intergovernmental Panel on Climate Change. 2007. Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.

_____.2014. Climate Change 2014 Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland.

_____.2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)] Cambridge University Press.

https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf (accessed May 2022).

Jano Baghdanian & Associates (JBA). 2020. Ararat Homes Traffic Impact Analysis. August 17, 2020.

_____. 2021. Ararat Homes Traffic Analysis Supplement. June 16, 2021.

Lawrence E. Kinsler and R. Frey, Austin and B. Coppens, Alan and V. Sanders, James. Fundamentals of Acoustics, 4th Edition. ISBN 0-471-84789-5. Wiley-VCH, December 1999.

Los Angeles Bureau of Sanitation (LASAN). 2013. *Zero Waste Progress Report*. https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf (accessed May 2022).

_____. Clean Water. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_afrLoop=12515449962685467&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=1bf3bx0uhw_162#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D12515449962685467%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1bf3bx0uhw_166

_____. 2023b. Treatment Process. https://lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=16865u5e8g_5&_afrLoop=12518389830944514#!

Los Angeles, City of. 1995a. The Citywide General Plan Framework. July 27, 1995. https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf (accessed August 2023).

Los Angeles, City of. 1999. Noise Element of the City of Los Angeles General Plan. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

_____. 2001. General Plan Conservation Element. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf (accessed August 2023).

_____. 2006. L.A. CEQA Thresholds Guide. http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf

_____. GreenLA. An Action to Lead the Nation in Fighting Global Warming. May 2007.

_____. 2010. Mission Hills- Panorama City- North Hills Community Plan https://planning.lacity.org/plans-policies/community-plan-area/mission-hills-panorama-city-north-hills

_____ .2019. LA's Green New Deal Sustainability Plan 2019. April 2019. https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf (accessed May 2022).

_____. 2022. Updated Transportation Assessment for the Proposed Expansion of Ararat Homes Development Located at 15151-15155 West Mission Hills Road (ZA-2021-832-ELD-ZAA-ZAD-SPR/ENV-2021-833-EAF). January 28, 2022.

_____. 2023a. ZIMAS Public Generalized Zoning. http://zimas.lacity.org/ (accessed August 2023).

_____. 2023b. City of Los Angeles Department of Recreation and Parks: Who We Are. https://www.laparks.org/department/who-we-are (accessed August 2023).

City of Los Angeles, Department of City Planning. 2006b. Ordinance No. 177404. Accessed April 2018 at: https://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf

_____. 2017. Notice of Public Hearing, Citywide Proposed Zoning Code Amendment: Protected Tree Code Amendment. Accessed April 2018 at: https://planning.lacity.org/documents/codeStudies/ProtectedTreeCA.pdf

_____. 2018. Recommendation Report. Case No. CPC-2016-4520-CA, Council File 13-1339. March 22, 2018. Accessed April 2018 at: http://planning.lacity.org/StaffRpt/InitialRpts/CPC-2016-4520.pdf

Los Angeles, County of. 2004. Los Angeles County Airport Land Use Plan. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf

_____. 2022. Countywide Integrated Waste Management Plan: 2021 Annual Report. December 2022. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF

_____.2023. County of Los Angeles Enterprise GIS Airport Influence Area. https://egis-lacounty.hub.arcgis.com/datasets/airport-influence-area-1/explore?location=34.271311%2C-118.438781%2C13.39

Los Angeles County Sensitive Species Working Group. 2009. Los Angeles County's Sensitive Bird Species. Western Tanager 75(3): 1-16. January-February 2009.

Los Angeles Department of Transportation (LADOT). 2022. Updated Transportation Assessment for the Proposed Expansion of Ararat Homes Development Located at 15151-15155 West Mission Hills Road (ZA-2021-832-ELD-ZAA-ZAD-SPR/ENV-2021-833-EAF). January 28.

_____. 2023. NavigateLA. https://navigatela.lacity.org/navigatela/

Los Angeles Department of Water and Power (LADWP). 2020. Urban Water Management Plan. https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf (accessed September 2023).

South Coast Air Quality Management District (SCAQMD. 1993. CEQA Air Quality Handbook.

____. 2008. Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf (accessed May 2022).

____. 2009. Appendix C. Mass Rate LST Look Up Table. October 2009. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 (accessed May 2022).

____. 2017. 2016 Air Quality Management Plan. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf (accessed May 2022).

____. 2020. South Coast Air Basin Attainment Plan for 2006 24-hour PM2.5 Standard. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/fact-sheet-for-regional-public-hearing.pdf?sfvrsn=8 (accessed May 2022).

____. 2022. 2022 Air Quality Management Plan. December 2, 2022. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

____. 2023a. SCAQMD Air Quality Significance Thresholds. March 2023. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 (accessed May 2022).

Southern California Association of Governments (SCAG). 2001. Employment Density Study. October 31, 2001.

_____. 2008. Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf (accessed May 2022).

_____. Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy). https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx (accessed May 2022).

_____. 2020b. Demographics and Growth Forecast. September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

_____. 2020c. Demographics and Growth Forecast Technical Report. Adopted September 3, 2020. https://scag.ca.gov/read-plan-adopted-final-plan (accessed August 2023).

Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California*. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

State Water Resources Control Board (SWRCB). 2023. GeoTracker. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=15105+mission+hills+road (accessed August 2023).

United States Energy Information Administration (U.S. EIA). 2022. U.S. energy facts explained. June 10, 2022. https://www.eia.gov/energyexplained/us-energy-facts/ (accessed March 2023).

_____. 2023a. Table C14. Total Energy Consumption Estimates per Capita by End-Use Sector, Ranked by State, 2020. https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_sum/html/rank_use_capita.html&sid=US&sid=CA (accessed June 2023).

_____. 2023b. California State Energy Profile. April 20, 2023. https://www.eia.gov/state/print.php?sid=CA (accessed June 2023).

United States Environmental Protection Agency. 2021. “Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases.” Last modified: July 21, 2021. epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases (accessed May 2022).

_____. 2023. “Criteria Air Pollutants.” Last modified: September 29, 2023. https://www.epa.gov/criteria-air-pollutants (accessed May 2022).

Appendix A

Project Plans

Appendix B

CalEEMod

Appendix C1

Biological Resources Assessment

Appendix C2

Tree Report

Appendix D

Cultural Resources Technical Report

Appendix E1

Geotechnical Report

Appendix E2

Soils Report Approval Letter

Appendix F

Phase I ESA

Appendix G

Noise and Vibration Report

Appendix H1

Transportation Impact Analysis

Appendix H2

Traffic Impact Analysis Supplement

Appendix H3

Updated Transportation Assessment