VI. SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the SCEA contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on the CEQA Guidelines Appendix G Environmental Checklist Form. The *L.A. CEQA Thresholds Guide* (2006) is utilized only where applicable and relevant in assisting the Appendix G thresholds.

1. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the *L.A. CEQA Threshold Guide (2006)* shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[1]

As shown in Sections II. Project Description and III. SCEA Criteria and TPP Consistency Analysis, the Project is a mixed-use development containing residential and commercial uses on an infill site within a TPA and therefore, PRC Section 21099(d) applies to the Project and the Project is exempt from aesthetic impacts. The analysis in this initial study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d)

[1] *City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed October 24, 2019.*

was not in effect. As such, nothing in the aesthetic impact discussion in this initial study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

The following analysis utilizes information provided in the Los Lirios Apartments Arborist Report, prepared by James Komen, December 16, 2019 (Tree Report); and the Record Search Results for the Proposed Los Lirios Mixed-Use Project, prepared by the South Central Coastal Information Center, June 26, 2019 (Historic Records Search). The Tree Report is available as Appendix A and the Historic Records Search is available as Appendix B.

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. 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). The Project Site is located within a high-density urban area and two of the Project Site's parcels are currently vacant. The other four parcels include the Metro Soto Station and Plaza. The Project Site is surrounded by adjacent residences to the south, residences and commercial uses to the west across an alleyway, residences to the east across S. Soto Street, and residences and commercial uses to the north across E. 1st Street.

The Project Site is comprised of six parcels within a developed area of the Boyle Heights Community Planning area of the City of Los Angeles and does not possess any unique aesthetic characteristics. The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63 affordable units and one market-rate manager's unit, 2,443 square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. Additionally, 8,171 square feet of open space will be provided via a central courtyard, community terrace, roof terrace, community room, exercise room, and private balconies. Due to the relatively level topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views. Therefore, no significant impact to any recognized or valued scenic view would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. The Project Site is bounded by E. 1st Street to the north, S. Soto Street to the east, an alley to the west, and a private property improved with a multi-family residential building to the south. There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.[2] There are also no locally-designated scenic highways in the Project Site vicinity.[3] The Project Site currently contains four vacant parcels and two parcels containing Metro Soto Station and Plaza. The Metro Station is not considered a scenic resource. The Project Site does not contain any natural scenic resources, such as native habitat, locally protected tree species, or unique geologic features. As detailed in the Project's Tree Report, there are 29 trees on the Project Site, none of which are classified as a protected native species. All but 19 trees would be removed for the construction of the Project. As concluded in the Historic Records Search, there are no designated historic resources on the site. Because there are no

[2] *ArcGIS, California Scenic Highways,, website: https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a, accessed: August 2019.*

[3] *City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A5 – Central, East and Cornfield Arroyo Secco Plan (CASP) Subarea, September 2016.*

scenic resources on the Project Site, and the Site is not within a State scenic highway, there would be no impact.

c) For a project in a non-urbanized area, would it 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.) For a project in an urbanized area, would it conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The existing visual character of the Project Site is located in a highly urbanized area, surrounded by a variety of land uses including commercial and residential uses. As stated earlier, the Project Site is currently vacant and includes the Metro Soto Station Plaza.

The Project Site is in an urbanized area and would not conflict with applicable zoning and regulations that govern scenic quality as discussed in detail in Section VI.11, *Land Use and Planning*. The Project is designed to integrate a new mixed-use building into a cohesive, pedestrian-friendly environment that would enliven the Metro Soto Station Plaza as well as the street frontages along E. 1st Street and S. Soto Street with ground level commercial uses and subterranean parking that is hidden from the street. The new street level public plaza area would include landscaping and would open up visually to the public.

The Project would also upgrade the visual character by providing new trees and landscaping along the Project perimeter. Native and drought tolerant plants would also be integrated to reduce water requirements. The proposed building would provide a variety of architectural materials and building planes and ground-level façade transparency, with special attention to the surrounding environment while also providing a pedestrian-scale street level. The design of the proposed building alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest and to avoid repetitive façades. Because the project would not conflict with applicable zoning and other regulations governing scenic quality, this impact would be less than significant.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project is located in a well-lit mixed-use area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity. The Project Site is located within a mixed-use environment, so that light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect.

Per LAMC Section 41.40, construction activities are prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. Construction activities are prohibited on Sundays and all federal holidays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur during evening hours. During operations, the Project's mix of uses would generate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting, similar to other uses in the area. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but would not be so bright as to cause substantial light spill off the Project Site.

Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations which require that operational lighting will be directed downward or on the specific on-site feature to be lit or avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. . Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Specifically, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

LAMC Section 14.4.4.E, requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. Therefore, light impacts are considered less than significant.

Existing glare in the Project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off of reflective materials utilized in buildings and from vehicle windows and other surfaces. In accordance with City requirements (i.e. Chapter 9, Article 3, Division 1, Section 93.017(b))the exterior of the proposed structure would use materials such as, high-performance and/or low-reflective glass (no mirrorlike tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts are not expected to be substantial or to adversely affect day or night views. Therefore, glare impacts are considered less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with related projects would result in an incremental intensification of land uses in a heavily urbanized area of the City of Los Angeles. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Related projects in combination with the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Although some views of architecturally or historically important buildings could be obscured by taller buildings constructed within a line of sight over existing low rise development and parking lots, there would be limited potential for such occurrences and views of primary facades of architecturally or historically important buildings would not likely be affected. In addition, most development of a larger scale would be subject to environmental review and indirect impacts on historic resources or other scenic resources would be mitigated to the degree feasible. Accordingly, as the Project would not have direct or indirect impacts on scenic resources, its contribution to impacts on views of scenic resources from other related projects would not be cumulatively considerable and cumulative impacts would be less than significant.

Because the visual character of the area is defined by a range of diverse architecture that is generally not cohesive, and in many areas, like the Project Site, lacks a high level of visual quality, it is anticipated that new development would in general upgrade the visual quality of the area. New development subject to discretionary approval would conform to the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would not degrade the visual character of the area. Accordingly, as the related projects and the Project would not degrade the visual character of the

Project area, the Project's contribution to adverse impacts on visual character would not be cumulatively considerable and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not significantly impact sensitive uses. Accordingly, the Project's contribution to light and glare impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project 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 nonagricultural use?

No Impact. The Project Site is located in a highly urban area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. . No agricultural uses, or related farmland operations, are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP).[4] Therefore, no impact would occur and no mitigation measures are required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is located within the Boyle Heights Community Plan area. The Applicant is requesting a GPA per LAMC Section 11.5.6 to change the Land Use Designation from Low Medium II to Highway Oriented Commercial/Limited Commercial. In addition, the applicant is requesting a JJJ complaint Vesting Zone Change per LAMC Section 12.32(Q) from C2-1-CUGU and RD1.5-1-CUGU to [T][Q]C2-1-1CUGU. The existing and proposed land use designation and zonings for the Project do not allow agricultural production, and there is no farmland at the Project Site. As such, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Moreover, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract.[5] Thus, Project implementation would not conflict with Williamson Act contact land nor would the Project conflict with agricultural zoning. Therefore, no impact would occur and no mitigation measures are required.

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[4] *State of California Department of Conservation, California Important Farmland Finder, website: https://maps.conservation.ca.gov/dlrp/ciff/, accessed: August 2019.*

[5] *California Department of Conservation, The California Land Conservation Act of 1965, 2016 Status Report, published December 2016, website: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2016%20LCA%20Status%20Report.pdf, accessed: August 2019.*

c) Would the project 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. In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or Timberland Production. The Applicant is requesting a GPA per LAMC Section 11.5.6 to change the Land Use Designation from Low Medium II to Highway Oriented Commercial/Limited Commercial. In addition, the Applicant is requesting a JJJ complaint Vesting Zone Change per LAMC Section 12.32(Q) from C2-1-CUGU and RD1.5-1-CUGU to [T][Q]C2-1-1CUGU. The existing and proposed land uses and zoning at the Project Site do not include or permit forest land, timberland, or Timberland Production land uses. Therefore, no impact would occur and no mitigation measures are required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. See also the discussion under threshold question 2.c), above. Therefore, no impact would occur and no mitigation measures are required.

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

No Impact. As discussed in the above threshold questions, the Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

No Impact. As with the Project, the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing farming, agricultural or forest-related operations. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use, or result in the loss of forest land or the conversion of forest land to non-forest use.

3. AIR QUALITY

The following analysis utilizes information provided in the *Air Quality and Noise Analyses, Los Lirios Mixed-Use Project*, prepared by Pomeroy Environmental Services, April 2019 (Air Quality and Noise Report); and the *Transportation Impact Study, Los Lirios Mixed-Use Project*, prepared by Linscott, Law & Greenspan, Engineers, July 18, 2018 (Transportation Study). The Air Quality and Noise Report is available as Appendix C and the Transportation Study is available as Appendix D.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The South Coast Air Quality Management District SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 15-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin. The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which was adopted April 7, 2016. The 2016 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

For development projects, SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by a project to the population projections used in the development of the AQMP. The Project is located within the Boyle Heights Community Plan area. As part of the City's General Plan, the Boyle Heights Community Plan (Community Plan) was adopted in 1998 and sets forth goals, objectives, policies, and implementation programs that pertain to the Boyle Heights. The Community Plan offers projections for population, housing, and employment for the area up to the year 2010. Since the Project is expected to become operational in 2021 this report analyzes compliance with the AQMP through SCAG's population estimates in the 2016–2040 RTP/SCS as they are the most current estimates. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections used in the formulation of the 2016 AQMP. As such, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project would comply with all SCAQMD rules and regulations that are applicable to the Project; the Project Applicant is not requesting any exemptions from the currently adopted or proposed SCAQMD rules.

The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63-affordable units and one market-rate manager's unit, 2,443 square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. As part of its comprehensive planning process for the Southern California region, SCAG has divided its jurisdiction into 14 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. SCAG's 2012 housing estimates for the City are 1,325,500 total housing units and estimates the housing of the City will increase

to 1,690,300 housing units by 2040, a 27.5 percent increase.[6] The Project's addition of 64 housing units would account for less than 0.02 percent of the total growth from 2012 to 2040. Thus, the Project's relatively small increase in housing would not have the potential to conflict with the regional growth projections for the Los Angeles subregion. In addition, and further discussed herein, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Thus, the Project would not impair implementation of the AQMP, and this impact would be less than significant.

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

Less Than Significant Impact. Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the California Air Resources Board (ARB) to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment." If the pollutant exceeds the standard, the area is classified as a "non-attainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified." Attainment status of the Basin with regard to the national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS) are shown in Table VI-1, Attainment Status for the South Coast Air Basin. As shown, the Basin is in nonattainment for ozone, PM_{10} and $PM_{2.5.}$

[6] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast Appendix, Adopted April 2016, website: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf, page 24 accessed: August 2019.*

Table VI-1
Attainment Status for the South Coast Air Basin

Pollutant	Attainment Status	
	NAAQS	CAAQS
Ozone (1-Hour)	Non-Attainment (Extreme)	Non-Attainment
Ozone (8-Hour)	Pending – Expect Non-Attainment (Extreme)	Non-Attainment
Carbon Monoxide (1- & 8-hour)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (1-Hour)	Unclassifiable/Attainment	Attainment
Nitrogen Dioxide (Annual)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (1-Hour)	Designations Pending (expect Unclassified/Attainment)	Attainment
Sulfur Dioxide (24-Hour & Annual)	Unclassified/Attainment	attainment
PM_{10} (24-Hour)	Attainment (Maintenance)	Non-Attainment
PM_{10} (Annual)	N/A	Non-Attainment
$PM_{2.5}$ (24-Hour)	Non-Attainment (Serious)	N/A
$PM_{2.5}$ (Annual)	Non-Attainment (Moderate)	Non-Attainment
Lead	Non-Attainment (Partial)	Attainment

Source: SCAQMD, Air Quality Management Plan Appendix II website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-ii.pdf?sfvrsn=4, accessed: August 2019.

Because the South Coast Air Basin is currently in nonattainment for ozone, PM_{10} and $PM_{2.5}$, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.[7]

A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. The Project Site is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table VI-2, SCAQMD Thresholds of Significance, be considered significant. The City defers to these thresholds for the evaluation of construction and operational air quality impacts.

[7] *South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix A, August 2003.*

Table VI-2
SCAQMD Thresholds of Significance

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.

Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2; accessed: August 2019.

Regional Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 20 months, which is a conservative estimate and yields the maximum daily impacts. Shoring, excavation and site preparation would occur for approximately one month with an export of approximately 12,908 cubic yards of soil. Building construction would occur for approximately 19 months. This phase would include the construction of the proposed structure, connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the Project Site. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2016.3.2) recommended by the SCAQMD to quantify the estimated daily emissions associated with Project construction. The results are presented in Table VI-3, Estimated Peak Daily Construction Emissions, which identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

Table VI-3
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Shoring/Excavation/Site Preparation Phase						
Fugitive Dust	--	--	--	--	2.09	1.12
Off-Road Diesel Equipment	1.35	15.09	6.45	0.01	0.68	0.63
On-Road Diesel (Hauling)	0.66	21.37	4.97	0.06	1.35	0.42
Worker Trips	0.04	0.03	0.32	0.01	0.09	0.02
Total Emissions	***2.05***	***36.49***	***11.74***	***0.08***	***4.21***	***2.19***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	2.03	14.79	13.19	0.02	0.80	0.77
Building Construction Vendor Trips	0.04	1.28	0.37	0.01	0.08	0.03
Building Construction Worker Trips	0.30	0.21	2.37	0.01	0.67	0.18
Architectural Coatings	11.09	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.22	1.53	1.82	0.01	0.09	0.09
Architectural Coatings Worker Trips	0.06	0.04	0.44	0.01	0.14	0.04
Total Emissions	***13.74***	***17.85***	***18.19***	***0.06***	***1.78***	***1.11***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
See Appendix C for calculation sheets.

These calculations assume compliance with SCAQMD Rule 1113 – Architectural Coatings and appropriate dust control measures would be implemented as part of the Project during each phase of development as required by SCAQMD Rule 403 – Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes (at least two times per day), applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. As shown in Table VI-3, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts are considered to be less than significant. Localized air quality emissions are addressed below.

Regional Operational Emissions

The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63 affordable units and one market-rate manager's unit, 2,443 square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the Project. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod 2016.3.2 recommended by the SCAQMD. The results of these calculations are presented in Table VI-4, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant. Localized air quality emissions are addressed below.

Table VI-4
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	1.98	1.05	5.88	<0.01	0.11	0.11
Energy Demand	0.04	0.34	0.21	<0.01	0.03	0.03
Mobile (Motor Vehicles)	0.85	3.82	10.26	0.03	2.70	0.74
Total Project Emissions	**2.87**	**5.21**	**16.35**	**0.04**	**2.83**	**0.88**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	1.98	1.05	5.88	<0.01	0.11	0.11
Energy Demand	0.04	0.34	0.21	<0.01	0.03	0.03
Mobile (Motor Vehicles)	0.82	3.90	9.86	0.03	2.70	0.74
Total Project Emissions	**2.85**	**5.28**	**15.95**	**0.04**	**2.83**	**0.88**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No

Note: Column totals may not add due to rounding from the model results.
See Appendix C for calculation sheets.

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of the thresholds of significance recommended by the SCAQMD. In addition, as discussed under threshold question a), the Project would not exceed SCAG projections for the City population and is therefore consistent with the AQMP. Also, as discussed below, localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment. Thus, cumulative air quality impacts associated with the Project would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function. The nearest air quality sensitive receptors to the Project Site are:

- adjacent residences to the south;
- residences to the west (20 feet);
- residences to the east (85 feet);
- residences to the north (150 feet); and
- school use to the southwest (480 feet).

Localized Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each Source Receptor Area (SRA) and various distances from the source of emissions.

In the case of this analysis, the Project Site is located within SRA 1 covering the Central Los Angeles area. The nearest sensitive receptors to the Project Site are residential uses within 25 meters. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. The Project Site is 1.08 acres in size. Therefore, consistent with SCAQMD recommendations, the LSTs for a one-acre site in SRA 1 with receptors located within 25 meters have been used to address the potential localized NOx, CO, PM_{10}, and $PM_{2.5}$ emissions to the area surrounding the Project Site.

As shown in Table VI-5, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a one-acre site in SRA 1. Therefore, localized air quality impacts from Project construction activities on the off-site sensitive receptors would be less than significant.

Table VI-5
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Shoring/ Site Preparation Emissions	**15.09**	**6.45**	**2.77**	**1.75**
SCAQMD Localized Thresholds	*74.00*	*680.00*	*5.00*	*3.00*
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	**16.32**	**15.01**	**0.89**	**0.86**
SCAQMD Localized Thresholds	*74.00*	*680.00*	*5.00*	*3.00*
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings.

[a] The Project Site is 1.06 acres. Consistent with SCAQMD recommendations, the localized thresholds for all phases are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 1.

[b] The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.

See Appendix C for calculation sheets.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) from A-C to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on the Project's Transportation Study, the Project is not anticipated to have significant traffic impacts at any of the 5 study intersections. Thus, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants (TAC)

As the Project consists of residential and commercial uses, the Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from Project implementation. In addition, construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. In addition, construction activity would not result in long-term substantial sources of diesel particulate matter or other TAC emissions (i.e., 30 or 70 years) and would therefore not have the potential to generate significant health risks. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

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

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of residential and commercial uses, which are not typically associated with odor complaints. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. As mentioned previously, the Project would be consistent with SCAQMD Rule 1113 – Architectural Coatings. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Because the Basin is currently in non-attainment for O_3, PM_{10}, and $PM_{2.5}$, the Project, in combination with the related projects, could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that, if an individual development project generates less than significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.[8]

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of thresholds of significance recommended by SCAQMD. Also, localized emissions generated by the Project would not exceed SCAQMD's LSTs. Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in non-attainment. Cumulative air quality impacts would be less than significant and no mitigation measures are required.

4. BIOLOGICAL RESOURCES

The following analysis utilizes information provided in the *Los Lirios Apartments Arborist Report*, prepared by James Komen, December 16, 2019 (Tree Report); The Tree Report is available as Appendix A.

[8] *South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix A, August 2003.*

a) Would the project 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. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The central and valley portions of the City contain fewer natural areas.[9] The criteria identified in the L.A. CEQA Thresholds Guide (2006) is used where applicable and relevant to assist in analyzing the Appendix G threshold. According to Exhibit C-4 of the *L.A. CEQA Threshold Guide*, the Project Site and surrounding area are not identified as a biological resource area.[10] Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[11]

The Project Site does not contain any habitat capable of sustaining 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. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. As detailed in the Project's Tree Report, there are 29 trees on the Project Site, none of which are classified as a protected native species under the City of Los Angeles Ordinance No. 177,404. Of the 29 trees on the site, 19 trees would be removed for the construction of the Project. Moreover, there are no protected trees on neighboring properties that will be affected by the proposed construction. The existing trees on the Project Site would be removed for the Project.

The removal of vegetation and disturbances to the ground may result in take of nesting native birds on the Project Site. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Project Applicant would be required to adhere to the regulatory compliance measure below (RCM-BIO-1) to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees on the Project Site. Because existing regulations govern the protection of migratory birds, with adherence to RCM-BIO-1, the Project would have a less than significant impact on sensitive biological species or habitat.

Regulatory Compliance Measure

RCM BIO-1 Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which

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[9] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-1 – C-2.*

[10] *Ibid, Exhibit C-2, Biological Resource Areas (Metro Geographical Area).*

[11] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: http://planning.lacounty.gov/gisnet3, accessed: August 2019.*

generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

a) Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

b) If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

c) Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d) The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

b) Would the project 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?

No Impact. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[12] As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures are required.

[12] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-4, Biological Resource Areas (Coastal and Southern Geographical Area); and U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed: August 2019*.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[13] Further, as the Project Site contains urban uses, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts to riparian or wetland habitats would occur with implementation of the Project and no mitigation measures are required.

d) Would the project 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?

No Impact. Due to the developed condition and location of the Project Site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species. No impacts would occur with the movement of any native resident or migratory fish or wildlife species and no mitigation measures are required.

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

No Impact. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree is a protected tree:

- Oak tree including Valley Oak (*Quercus lobata*), California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*);
- Southern California Black Walnut (*Juglans californica* var. *californica*);
- Western Sycamore (*Platanus racemose*); and
- California Bay (Umbellularia californica).

As detailed in the Project's Tree Report, there are 29 trees on the Project Site, none of which are classified as a protected native species. Of the 29 trees on site, 19 trees would be removed for the construction of the Project. Moreover, there are no protected trees on neighboring properties that would be affected by the proposed construction. The Project Site is located within a highly urbanized area and two of the Project Site's parcels currently vacant. The other four Project parcels include the Metro Soto Station and Plaza.. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources and there would be no impact.

[13] *Ibid*.

f) Would the project 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. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place that includes the Project Site.[14,15,16] Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant. Similar to the Project, the majority of the related projects occurring in the Project Site area would occur on previously disturbed, urbanized land. As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect in these regards. The Project would fully comply with City ordinances and regulatory compliance measures (RCM-BIO-1). Related projects would also be required to comply with the City's tree requirements and to adhere to the MBTA and Fish and Wildlife code provisions. Therefore, cumulative biological resource impacts would be less than significant.

5. CULTURAL RESOURCES

The following analysis utilizes information provided in the *Record Search Results for the Proposed Los Lirios Mixed-Use Project*, prepared by the South Central Coastal Information Center, June 26, 2019 (Historic Records Search). The Historic Records Search is available as Appendix B.

a) Would the project Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. As such, the Project would not involve the demolition of any existing structures. The Project Site does not require historic preservation review and is not within a historic preservation overlay zone;[17] nor is the Project Site identified as a City Historic-Cultural Monument (HCM) and is not listed or eligible to be listed in the State or National registers.[18] Moreover, the HistoricPlacesLA resource inventory indicates no historic uses

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[14] *California Regional Conservation Plan, August 2015, website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed: August 2019.*

[15] *Habitat Conservation Plans – Region 8, website: http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP, accessed: August 2019.*

[16] *Habitat Conservation Plan Documents, website: https://www.fws.gov/carlsbad/hcps/HCP_Docs.html, accessed: August 2019.*

[17] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[18] *City of Los Angeles Department of City Planning, LA Historic-Cultural Monuments, May 2015, website: http://planning.lacity.org/mapgallery/image/citywide/LA_HCM.pdf, accessed: August 2019.*

within or adjacent to the Project Site.[19] The closest historic resources to the Project Site are two single family residences (118 S. Soto Street and 124 S. Soto Street) located 85 feet east of the Project Site across S. Soto Street which are both designated as HP02 (historical single family property) under the California Office of Historic Preservation (COHP). In addition, the Peabody House, located approximately 100 feet to the east of the Site is identified on SurveyLA but is not designated as a historic resource[20] There are no historical resources on the Project Site and no historical resources would be demolished, altered, or relocated as a result of the Project. As such, the Project would have no direct impacts to historical resources.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact. The Project Site and immediately surrounding area do not contain any known archaeological sites or archaeological survey areas.[21] Additionally, the Project Site is located within a highly urbanized area and four of the Project Site's parcels are currently vacant. The other two Project parcels include the Metro Soto Station and Plaza. Any archaeological resources that may have existed near the site surface are likely to have been disturbed or previously removed. However, the Project would likely result in deeper excavations than previously performed on the site, including excavation to depths up to 11 feet below grade to construct the subterranean parking structure. As such, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during excavation activities. While the uncovering of archaeological resources is not anticipated, the following regulatory compliance measure is required to ensure that any potential impact to a previously unknown archaeological resource is reduced to a less than significant level. Therefore, with required adherence to the regulatory compliance measure (RCM CUL-1), the Project's impacts on archaeological resources would be less than significant.

Regulatory Compliance Measure

RCM CUL-1 If any archaeological materials are encountered during excavation, grading, or construction activities, work shall cease in the area of the find and a qualified archaeologist shall be secured by contacting the South Central Coastal Information Center located at California State University, Fullerton, or a member of the Society of Professional Archaeologists (SOPA) or a SOPA-qualified archaeologist, who shall determine the significance of the resource(s) as defined in Section 15064.5 of the State CEQA Guidelines. The archaeologist shall prepare a survey, study, or report evaluating the impact. Said survey, study, or report shall contain appropriate measure(s), as necessary, for the preservation, conservation, or relocation of the resource, and the Project Applicant shall comply with the measure(s).

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[19] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: http://www.historicplacesla.org/map, accessed: August 2019.*

[20] *Ibid.*

[21] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. Although the Project Site has been subject to grading and development in the past, the Project would require excavations at a depth of approximately 11 feet below ground surface. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries.

Although the possibility of encountering human remains is low, due to extensive previous development on the Site, construction and ground disturbing activity of the Project could potentially disturb previously unknown human remains. California PRC Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources and provides procedures in the event human remains of Native American origin are discovered during Project implementation and land owners are required to address the Project's potential impacts to human remains. PRC Section 5097.98 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a prescribes protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent. Therefore, compliance with existing regulation (see below for regulatory compliance measure), the Project's impacts on disturbing human remains would be less than significant.

Regulatory Compliance Measure

RCM CUL-2 If human remains are encountered unexpectedly during excavation, grading, or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during said activities, the following procedure shall be observed:

a) Stop immediately and contact the Los Angeles County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
(323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). In such case:

b) The NAHC will immediately notify the person it believes to be the Most Likely Descendent (MLD) of the deceased Native American.

c) The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

d) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Cumulative Impacts

Less Than Significant Impact. Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis.

Cumulative impacts would occur if the Project and related projects were to have combined significant adverse effects on historical resources of the same type in the immediate vicinity, or if they were to contribute to changes within a historic district; however, there are no historical resources on the Project Site. The related projects are isolated by intervening development and located in a number of locations of varying character and context. As discussed above, the Project would not result in direct or indirect impacts to historical resources, and, as such, the Project's effects would not be cumulatively considerable, and cumulative impacts would be less than significant.

Many of the related projects would require excavation that could potentially expose or damage potential archaeological resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, compliance with regulatory measures for the protection of human remains, would be identified for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains.

6. ENERGY

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

Less Than Significant Impact. The Project would be designed and operated in accordance with the applicable State Building Code Title 24 regulations and City of Los Angeles Green Building Code, which impose energy conservation measures.

During Project construction, energy would be consumed in the form of electricity associated with electric-powered cranes and welders, the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. LADWP provides electrical service to the City, including the Project Site. In April 2018, LADWP adopted the *2017 Power Strategic Long-Term Resource Plan* (SLTRP), which provides a 20-year roadmap to guide LADWP in its efforts to supply reliable electricity in an environmentally responsible and cost effective manner. The 2017 SLTRP re-examines and expands its analysis on the *2016 Final Power Integrated Resource Plan* (IRP) resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification.[22] LADWP generates power from a variety of different sources that include renewable energy, hydroelectric, natural gas, nuclear energy, and other fuels. LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the State's

[22] *Los Angeles Department of Water and Power, Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, website: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=enux7i582_29&_afrLoop=2307285007464363, accessed: August 2019.*

energy from renewables by 2030.[23] Current installed generation capacity is over 7,880 megawatts of power.[24] As such, LADWP would be able to support electricity consumption during construction of the Project. Moreover, electricity consumption during construction of the Project would be temporary and similar other development Projects in the City.

Electricity consumption during operation of the Project would occur due to the residential, commercial, and parking uses. Table VI-6, Estimated Project Electricity Consumption, presents the electricity the Project is expected to consume. It should be noted that CalEEMod, which is based on the 2016 Title 24 standards, was utilized to calculate the electricity consumption on the following table.

Table VI-6
Estimated Project Electricity Consumption

Land Use	Electricity Consumption (kWh/year)
Residential[a]	394,141
Retail	144,100
Project Total:	**538,241**

Note: kWh = kilowatt hours
[a] Includes parking areas.
See Appendix E for calculation sheets.

According to LADWP, electric service is available and will be provided to the Project Site in accordance with LADWP regulations and the Project is part of the total growth load forecast for the City and has been taken into account in the planned growth of the power system.[25] Moreover, LADWP estimates the residential sector will consume approximately 8.0 billion kilowatt hours (kWh) in 2021 (Project build-out year) and the commercial sector will consume approximately 12.1 billion kWh in 2021.[26] The Project would have an electricity demand of approximately 394,141 kWh per year for the residential uses, which represents 0.005 percent of the anticipated residential sector demand in 2021. Additionally, the Project would have an electricity demand of approximately 144,100 kWh per year for the commercial uses, which represents approximately 0.001 percent of the anticipated commercial sector demand in 2021.

Southern California Gas Company (SCG) provides natural gas service to the City, including the Project Site. The *2018 California Gas Report* presents a comprehensive outlook for natural gas requirements and supplies for California through 2035. SCG projects total gas demand to decline at an annual rate of 0.74 percent from 2018 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and

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[23] *California Environmental Protection Agency, Air Resources Board, Renewable Portfolio Standard, website: http://www.arb.ca.gov/energy/rps/rps.htm, accessed: August 2019.*

[24] *Los Angeles Department of Water and Power, Power, Facts & Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=enux7i582_50&_afrLoop=2308156176706556, accessed: August 2019.*

[25] *Letter correspondence from Jeffrey T. Bergman, District Engineer, Metro East Service Planning, July 2, 2019. (Appendix H)*

[26] *Los Angeles Department of Water and Power, Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, website: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=enux7i582_29&_afrLoop=2307285007464363, accessed: August 2019.*

conservation savings linked to Advanced Metering Infrastructure (AMI). From 2018 to 2035, SCG expects residential demand to decline from 236 Billion Cubic Feet (Bcf) to 186 Bcf. SCG expects the non-residential markets to decline at an average annual rate of 0.28 percent or from 117 Bcf in 2018 to 112 Bcf by 2035. SCG annual gas supply is expected to be approximately 1,378 Bcf each year from 2023 until at least 2035.[27]

Natural gas to the Project Site would be provided by existing SCG facilities in the Project vicinity. Table VI-7, Estimated Project Natural Gas Consumption, presents the amount of natural gas the Project is expected to consume. It should be noted that CalEEMod 2016.3.2, which is based on the 2016 Title 24 standards, was utilized to calculate the natural gas consumption on the following table.

Table VI-7
Estimated Project Natural Gas Consumption

Land Use	Natural Gas Consumption (kBTU/year)
Residential	724,560
Retail	581,000
Project Total:	**1,305,560**
Note: kBTU = Thousand British Thermal Units *See Appendix E for calculation sheets. Assumes all natural gas hearths.*	

As shown above, the Project's natural gas consumption would represent an extremely small percentage of SCG's total usage supplied to residential and commercial buildings. Upon supply availability, SCG will provide gas service to the Project in accordance with the rules and regulations in effect at the time service is provided.[28] SCG is satisfactorily meeting its obligations to its current customers and projects to meet obligations of its future customers. As such, SCG's existing infrastructure and storage supplies are well-prepared for the long-term forecasts. However, in the event SCG cannot provide service from the existing infrastructure, a system analysis would be conducted by SCG to determine the best method to provide service and appropriate actions such as pressure betterments may be initiated to resolve the issue. Thus, any corrective action, albeit unlikely, would be minimal and temporary, and would not result in any adverse environmental impacts. Because implementation of the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, this impact would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As stated above, the Project would be designed and operated in accordance with the with applicable State Building Code Title 24 regulations and City of Los Angeles Green Building Code, which impose energy conservation measures. As such, the Project would not conflict with or

[27] *California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, accessed: August 2019.*

[28] *Letter correspondence from Oscar Mariscal, Pipeline Planning Assistant, SoCalGas-Compton HQ, July 16, 2019. (Appendix H)*

obstruct a state or local plan for renewable energy or energy efficiency. Therefore, Project impacts would be less than significant, and no mitigation is required.

Cumulative Impacts

Less Than Significant Impact. Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 31 related projects located within the vicinity of the Project Site. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is SCG service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. The Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy impacts are concluded to be less than significant.

7. GEOLOGY AND SOILS

The following analysis utilizes information provided in the *Preliminary Geotechnical Investigation*, prepared by Geocon West Inc., April 16, 2018 (Geotechnical Investigation). The Geotechnical Investigation is available as Appendix F.

a) Would the project 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. The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Geological Survey (CGS, formerly known as CDMG) for the Alquist-Priolo Earthquake Fault Zone Program. By definition, an active fault is one that has had surface displacement within Holocene time (about the last 11,000 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years), but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive.

The Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the proposed development is considered low. However, the Project Site is located in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The closest surface trace of an active fault to the Project Site is the Raymond Fault located approximately 5.3 miles to the north. Other nearby active faults are the Hollywood Fault, the Eagle Rock Fault, the

Verdugo Fault, the Newport-Inglewood Fault Zone, and the Whittier Fault located approximately 5.7 miles north, 6.8 miles northeast, 7.4 miles north-northeast, 8.6 miles southwest, and 9.3 miles east-southeast of the site, respectively. The active San Andreas Fault Zone is located approximately 32 miles northeast of the Project Site.

Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 M_w 5.9 Whittier Narrows earthquake and the January 17, 1994 M_w 6.7 Northridge earthquake were a result of movement on the Puente Hills Blind Thrust and the Northridge Thrust, respectively. The Puente Hills Blind Thrust and the Elysian Park Thrust underlie the Project Site at depth. These deep thrust faults and others in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the site; however, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the site. The Geotechnical Investigation found no active faults traversing the Project Site. Moreover the Project would be required to implement 2016 California Building Code (2016 CBC) standards which include seismic design criteria, therefore the Project Site is not exposed to the hazard of surface fault rupture. Therefore, impacts would be less than significant and no mitigation measures are required.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be reduced if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Accordingly, through adherence to the 2016 CBC, the Project is required to incorporate the recommendation of the Geotechnical Investigation and the conditions of approval provided by LADBS, which takes into account seismic calculations from probabilistic seismic hazard modeling for the Project Site. The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Compliance with requirements would reduce seismic ground shaking impacts to the maximum extent practicable under current engineering practices. The Project would not contain uses or activities that would exacerbate the risks from existing environmental conditions. The Geotechnical Investigation's recommendations pertain to earthwork, foundation support, retaining walls, temporary excavations, floor slabs, exterior flatwork and auxiliary structures, concrete, soil corrosivity, pavement design, drainage, plan review, agency review, supplemental consulting, and project safety. The conditions of approval provided by LADBS pertain to, among others, conditions for use of fill and shoring, foundations, seismic design, and retaining walls (see Appendix F). Therefore, as the Project would be required to comply with the 2016 CBC, the recommendations in the Geotechnical Investigation, and the conditions of approval provided by LADBS, impacts would be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil

conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle indicates that the Project Site is not located in an area designated as having a potential for liquefaction. In addition, a review of the County of Los Angeles Seismic Safety Element indicates that the Project Site is not located within an area identified as having a potential for liquefaction. Based on these considerations, the potential for liquefaction and associated ground deformations beneath the Project Site is very low. Therefore, impacts associated with liquefaction would be less than significant.

(iv) Landslides?

Less Than Significant Impact. The topography at the Project Site and in the Project Site vicinity slopes gently to the north. The Project Site is located within a City of Los Angeles Hillside Grading Area but is not located within a City of Los Angeles Hillside Ordinance Area. According to the County of Los Angeles Safety Element, the Project Site is not located within a "hillside area" or an area identified as having a potential for slope instability or landslides. Additionally, the Project Site is not within a zone of required investigation for earthquake-induced landslides. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for landslides to adversely affect the Project Site in the current condition is considered low. Therefore, impacts associated with landslides would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site is located within a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. Project-related grading, excavation, and construction would expose soil on site, for a limited time, resulting in possible erosion. Excavation activities would be necessary to accommodate the Project, which would include one level of subterranean parking. Although there is a potential to expose soil to erosion, construction activities would be performed in accordance with the requirements of the 2016 CBC and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. Additionally, the Project would be required to develop a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. The potential to expose soil to erosion would be further reduced through implementation of stringent controls imposed by grading and building regulations, such as the conditions of approval provided by LADBS for the Project's Geotechnical Investigation and CBC compliance (see Appendix F). All grading activities would require permits from LADBS, which would include requirements to limit the potential impacts associated with erosion. In addition, on-site grading and site preparation must comply with all applicable provisions in Chapter IX, Division 70 of the LAMC, which addresses grading, excavation, and fills.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the proposed building and paving while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project as pad and roof drainage would be collected and transferred to the street or approved location in non-erosive drainage devices. Therefore, with implementation of the applicable grading and building requirements, impacts associated with soil erosion or loss of topsoil would be less than significant and no mitigation measures are required.

c) Would the project 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. Potential impacts with respect to liquefaction and landslide potential are evaluated above.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site. Therefore, impacts related to subsidence would be less than significant and no mitigation measures are required.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. The existing site soils encountered at the proposed foundation elevation during the Geotechnical Investigation are considered to have a "low" expansive potential; and are classified as "expansive" based on the 2016 CBC Section 1803.5.3. As stated previously, the Project would be required to comply with the 2016 CBC, the recommendations in the Geotechnical Investigation, and the conditions of approval provided by LADBS. The recommendations presented within the Geotechnical Report assume that the building foundations and slabs will derive support in the existing soil at the Project Site. Therefore, potential impacts from expansive soil would be less than significant and no mitigation measures are required.

e) Would the project 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 wastewater?

No Impact. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing City's sewer system, and septic tanks or alternative disposal systems are neither necessary nor are they proposed. The Project will connect to the City's sewer system. Therefore, no impact would occur and no mitigation measures are required.

e) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The Project Site does not contain any unique geological features. Moreover, there are no known paleontological resources within the Project Site,[29] and the Project Site and surroundings are not within an area identified as older surface sediments where fossils are likely to be found.[30] However, the Project would require additional ground disturbance that may involve deeper

[29] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.15, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles.*

[30] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.15, Figure CR-3, Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles.*

excavation than previously performed at the Site, including excavation to depths up to 11 feet below grade to construct the subterranean parking structure, into native soils that may contain paleontological resources. As such, previously unknown paleontological resources may exist beneath the Project Site that could be uncovered during excavation activities. While the uncovering of paleontological resources is not anticipated, the following regulatory compliance measure would ensure that any potential impact to a previously unknown paleontological resource is reduced to a less than significant level. Therefore, with mandatory compliance with RCM GEO-1, the Project's impacts on paleontological resources would be less than significant, and no mitigation measures are required.

Regulatory Compliance Measure

RCM GEO-1 If any paleontological materials are encountered during excavation, grading, or construction activities, work shall cease in the area of the find and a qualified paleontologist shall be secured by contacting either the Center for Public Paleontology USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum, who shall determine the significant of the resource(s). The paleontologist shall prepare a survey, study, or report evaluating the impact. Said survey, study, or report shall contain appropriate measure(s), as necessary, for the preservation, conservation, or relocation of the resource, and the Project Applicant shall comply with the measure(s). Project construction activities may resume in the area of the find once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum.

Cumulative Impacts

Less Than Significant Impact. Impacts associated with geologic and soil issues are typically confined to individual project sites or within a very localized area because of site-specific conditions. Related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic design for all related projects. Related projects would be required to implement LAMC regulations for grading and excavations during construction, including SWPPP and LID requirements. In addition, the related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the related projects would not need to use septic tanks or alternative waste disposal systems.

The Project Site is not located within a State-designated hazard zone for earthquake induced liquefaction or landslides. The Project and related projects would be required to comply with guidelines and building code regulations pertaining to seismic hazards and with approved geotechnical recommendations, risks associated with seismic rupture, lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. The Project and related projects would comply with LAMC Regulations related to excavation and grading and would not require the need for septic tanks or alternative waste disposal systems.

Many of the related projects would require excavation that could potentially expose or damage potential paleontological resources. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be identified for those related projects that have the potential to cause significant impacts to undiscovered paleontological resources.

Implementation of such mitigation measures for the related projects would avoid significant impacts paleontological resources and human remains.

As discussed previously, the identified RCM GEO-1, would ensure the Project would not cause a significant impact on a unique paleontological resource. Thus, the Project's contribution to cumulative impacts would not be cumulatively considerable.

8. GREENHOUSE GAS EMISSIONS

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

Less Than Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would have the potential to generate greenhouse gas emissions.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Assembly Bill 32 and Senate Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

CARB has adopted the First Update to the Climate Change Scoping Plan.[31] This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_2e. As part of the update, CARB revised the 2020 Statewide limit to 431 million metric tons of CO_2e, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual (BAU) forecast in the update is 509 million metric tons of CO_2e. The State would need to reduce those emissions by 15.3 percent to meet the 431 million metric tons of CO_2e 2020 limit.

CARB also aims to reduce GHG emissions significantly by 2030. As California moves closer to reaching the 2020 GHG emission reduction goal state legislation has focused on furthering GHG emission reduction targets. Executive Order B-30-15 was issued April 2015 and establishes a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. In 2016, the Legislature passed SB 32 with the companion bill AB 197 which further mandates the 2030 target and provides additional direction to CARB on strategies to reduce GHG emissions. In response to Executive Order B-30-15 and SB 32 CARB has released California's 2017 Climate Change Scoping Plan.[32] The plan shows California is on track to exceed its 2020 climate target, and establishes a path that will lead California to its 2030 climate goal. Per SB 32, the 2030 limit is 260 $MMTCO_2e$ a year. However, known commitments are expected to result in emissions that are 60 $MMTCO_2e$ above the target in 2030, and have a cumulative emissions reduction gap of about 236 $MMTCO_2e$. This means the known commitments do not decline fast enough to achieve the 2030 target. The remaining 236 $MMTCO_2e$ of estimated GHG emissions reductions would not be achieved unless further action is taken to reduce GHGs. However, while there is a potential GHG emissions reduction gap of approximately 236 $MMTCO_2e$, the following paragraphs note that the California legislature passed AB 398 to extend the cap-and-trade program from January 1, 2021 through December 31, 2030 in order to achieve the necessary GHG reductions associated with SB 32.

Cap-and-Trade Program

As mentioned above, the Scoping Plan identifies a cap-and-trade program as one of the strategies the State will employ to reduce GHG emissions that cause climate change. The cap-and-trade program is implemented by CARB and "caps" GHG emissions from the industrial, utility, and transportation fuels sections, which account for roughly 85 percent of the State's GHG emissions. The program works by establishing a hard cap on about 85 percent of total statewide GHG emissions. The cap starts at expected business-as-usual emissions levels in 2012 and declines two to three percent per year through 2020. Fewer and fewer GHG emissions allowances are available each year, requiring covered sources to reduce their emissions or pay increasingly higher prices for those allowances. The cap level is set in 2020 to ensure California complies with AB 32's emission reduction target of returning to 1990 GHG emission levels.

The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013-2014) includes all electricity generated and imported into California (the first deliverer of electricity into the

[31] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014.*

[32] *California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for achieving California's 2030 greenhouse gas target, November 2017.*

State in the "capped" entity and that one that will have to purchase allowances as appropriate), and large industrial facilities emitting more than 25,000 $MMTCO_2e$ per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015-2017) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels. The regulated entity will be the fuel provider that distributes the fuel upstream (not the gas station). In total, the cap-and-trade program is expected to include roughly 350 large businesses, representing about 600 facilities. Individuals and small businesses will not be regulated.

Under the program, companies do not have individual or facility-specific reduction requirements. Rather, all companies covered by the regulation are required to turn in allowances[33] in an amount equal to their total GHG emissions during each phase of the program. The program gives companies the flexibility to either trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more will have to turn in more allowances. Companies that can cut their emissions will have to turn in fewer allowances. Furthermore, as the cap declines, total GHG emissions are reduced. On October 20, 2011, CARB's Board adopted the final cap-and-trade regulation. The cap-and-trade program began on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions.[34]

On July 17, 2017 California legislature passed AB 398 to extend the cap-and-trade program from January 1, 2021 through December 31, 2030. AB 398 established the Compliance Offsets Protocol Task Force to provide guidance in approving new offset protocols that increase direct environmental benefits in the state. Moreover, AB 398 continues the gradual reduction in the number of allowances given to industries and reduces carbon offset credits to 4 percent from 2021 through 2025 and 6 percent from 2026 through 2030.

Executive Order B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. This new emission reduction target of 40 percent below 1990 levels by 2030 is a step toward the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. The executive order also specifically addresses the need for climate adaptation and directs state government to:

- Incorporate climate change impacts into the state's Five-Year Infrastructure Plan;
- Update the Safeguarding California Plan - the state climate adaption strategy - to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change;
- Factor climate change into state agencies' planning and investment decisions; and
- Implement measures under existing agency and departmental authority to reduce GHG emissions.

[33] *"Allowance" means a limited tradable authorization to emit up to one metric ton of carbon dioxide equivalent.*

[34] *CARB, Cap-and-Trade Program, website: https://www.arb.ca.gov/cc/capandtrade/capandtrade.htm, accessed: August 2019.*

California Senate Bills 1078, 107, 2, and 100; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

SB 100 was signed September 10, 2018 and requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, in accordance with the RPS, to 44 percent by 2024 and 52 percent by 2027.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards (CALGreen) Code

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The 2016 Title 24 standards (effective as of January 1, 2017) were revised and adopted in part to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2017 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the 2016 California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

In 2010, the City adopted the 2010 California Green Building Standards Code, also known as CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Building Code. As stated in Section 99.01.101.1 of the LAMC, these regulations shall be known as the Los Angeles Green Building Code and may be cited as such. The Los Angeles Green Building Code is Article 9 of a total of 9 Articles of Chapter IX of the LAMC, and adopts by reference the CALGreen Code except as amended therein. The provisions of this code shall apply to the construction of every new building, every building alteration with a building permit valuation of $200,000 or more, and every building addition, unless otherwise indicated in this code, throughout the City. The Los Angeles Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards. In addition, the Proposed Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32, described above.

On April 8th 2015, Los Angeles released pLAn, a sustainability plan for the City of Los Angeles. The plan covers a multitude of environmental, social, and economic sustainability issues. Many of the sustainability plan goals and actions relate to greenhouse gas reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, create benchmarking policy for building energy use, develop “blue, green, and black” waste bin infrastructure, reduce water use by 20%, and possibly require LEED Silver or better new construction.

GHG Significance Threshold

The City, the SCAQMD nor the State CEQA Guidelines Amendments provide adopted quantitative thresholds of significance for addressing a mixed-use project’s GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO_2e ($MTCO_2e$) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD continues to consider adoption of significance thresholds for non-industrial development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2: Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e$/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 $MTCO_2e$/year), and mixed-use projects (3,000 $MTCO_2e$/year). Under option 2 a single numerical screening threshold of 3,000 $MTCO_2e$/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$ per service population for project level analyses and 6.6 $MTCO_2e$ per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above are not adopted by SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain. However, for the purpose of evaluating the GHG impacts associated with the Project, this analysis utilizes the proposed 3,000 $MTCO_2e$ per year Tier 3 threshold for mixed-use projects (3,000 includes construction and operational emissions). These draft thresholds have been used for other projects in the Basin.

In addition and separate from the above quantitative threshold, if the Project can demonstrate qualitative consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs, then impacts associated with GHG emissions would be less than significant.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level.[35] CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* §15145). Therefore, the construction analysis does not consider such GHG emissions,

[35] *California Air Pollution Control Officers Association, CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008.*

but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are identified on an annual basis.

Emissions of GHGs were calculated using CalEEMod 2016.3.2 for construction of the proposed Project and the results of this analysis are presented in Table VI-8, Project Construction GHG Emissions. As shown in Table VI-8, total construction GHG emissions would be 652.88 metric tons. Consistent with SCAQMD recommendations quantitatively, construction GHG emissions have been amortized over a 30-year period and have been added to the annual operational GHG emissions of the Project identified in Table VI-9.

Table VI-8
Project Construction GHG Emissions

Phase	CO_2e Emissions (Metric Tons per Phase)
2020	404.01
2021	248.87
Total Project Construction GHG Emissions	**652.88**
GHG Emissions Amortized Over 30 Years	**21.76**
See Appendix E for calculation sheets.	

Operational GHG Emissions

The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63 affordable units and one market-rate manager's unit, 2,443square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. The operations of the Project would generate GHG emissions from the usage of on-road motor vehicles, electricity, natural gas, water, and generation of solid waste and wastewater. Emissions of operational GHGs are shown in Table VI-9, Project Operational GHG Emissions. As shown, the GHG emissions generated by the Project would be approximately 1,046.69 CO_2e MTY.

Table VI-9
Project Operational GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	15.49
Energy Demand (Electricity & Natural Gas)	370.48
Mobile (Motor Vehicles)	556.96
Solid Waste Generation	31.55
Water Demand	50.45
Construction Emissions [a]	21.76
Project Total	**1,046.69**

[a] The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.

See Appendix E for calculation sheets.

As noted previously, the SCAQMD released a draft guidance document regarding interim CEQA GHG significance thresholds. The SCAQMD proposed a tiered approach, whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. The SCAQMD also proposed a screening level of 3,000 metric tons of CO_2e per year for mixed-use projects, under which project impacts would be considered "less than significant." As shown in Table VI-9, the Project's GHG emissions would be under the 3,000 $MTCO_2e$ per year threshold for mixed-use projects.

In addition, and separate from the quantitative analysis above, there is substantial evidence to support that the Project is qualitatively consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. As discussed previously, the City adopted the L.A. Green Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of greenhouse gas emissions. In order to further implement the L.A. Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code applicable to new development projects. As it relates to new development, the City adopted the Los Angeles Green Building Code, which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City of Los Angeles. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission. The Scoping Plan encourages communities to adopt building codes that go beyond the state code. Accordingly, as the Los Angeles Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate it complies with the Los Angeles Green Building Code is considered consistent with statewide GHG-reduction goals and policies, including AB 32. The Project would be required to meet the LA Green Building Code and the CALGreen Code.

GHG Emissions Associated With Motor Vehicles

Motor vehicle related GHG emissions are regulated at the Federal, State and local levels. As discussed in the CARB Scoping Plan, the transportation sector – largely the cars and trucks that move goods and people – is the largest contributor with 38 percent of the State's total GHG emissions. Many of the transportation-related reduction measures identified in the Scoping Plan are focused on improving motor vehicle efficiencies through more restrictive statewide laws and regulations. Some of these measures include Pavley I & II Standards for light-duty vehicles, Low Carbon Fuel Standards (LCFS), aerodynamic improvements for heavy-duty vehicles, and medium- and heavy-duty vehicle hybridizations. Together, these measures are estimated to reduce 2020 forecasted emissions by 52.60 $MMTCO_2E$. These regulatory measures are aimed at improving efficiencies of the motor vehicle fleet mix across the State, and as such, GHG emissions from future motor vehicles accessing the Project Site would be reduced as a result of these statewide programs.

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

No Impact. As described above, through required compliance with the Los Angeles Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Moreover, as a multi-family residential project that concentrates affordable units in a TPA that offers public transportation, the Project furthers the transit-oriented development and VMT reduction goals and objectives in the SCAG adopted 2016–2040 RTP/SCS. Therefore, the Project's generation of GHG

emissions would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. As discussed in recent CEQA case law,[36] the global scope of climate change and the fact that CO_2 and other GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHGs, it does not. For individual projects, like the Project, which are designed to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of GHG emissions is as inevitable with population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure. These considerations militate in favor of consistency with meeting AB 32's Statewide goals as a permissible significance criterion for project emissions. Meeting our Statewide reduction goals does not preclude all new development. Rather, the Scoping Plan – the State's roadmap for meeting AB 32's target – assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary, it can be reasonably concluded that the project's impact is not cumulatively considerable, because it is helping to solve the cumulative problem of greenhouse gas emissions as envisioned by California law.[37]

As discussed above, the Project's total construction and operational GHG emissions would not exceed the 3,000 $MTCO_2e$/year threshold proposed by SCAQMD staff. In addition, and also detailed previously, through required implementation of the CALGreen Code and Los Angeles Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. As a mixed-use transit-oriented development within close proximity to regionally-serving transit infrastructure, the Project is also consistent with the VMT reduction goals of the adopted 2016–2040 RTP/SCS. Therefore, the Project's mixed-use design, urban location, and proximity to transit would be consistent with local and Statewide goals and policies (i.e., RTP/SCS and SB 375) aimed at reducing the generation of GHGs through integrated transportation, land use, housing and environmental planning.

Similar to the Project, the related projects and all future projects in the State would be reviewed for consistency with applicable State, regional, and local plans, policies, or regulations for the reduction of GHGs. Therefore, based on the discussion above, the Project's generation of GHG emissions would not be considered cumulatively considerable because of the scope of the emissions (i.e., the Project would not exceed the 3,000 $MTCO_2e$/year threshold proposed by SCAQMD) and because the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Therefore, the Project's cumulative impact would be less than significant and no mitigation measures are required.

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[36] *Supreme Court of California, Center for Biological Diversity et al. v. California Department of Fish and Wildlife (2015), S217763, 11-13.*

[37] *Addressing the Significance of Greenhouse Gas Emissions, supra, 4 Golden Gate U. Envtl. L.J. at p. 210.*

9. HAZARDS AND HAZARDOUS MATERIALS

The following analysis utilizes information provided in the *Phase I Environmental Site Assessment*, prepared by Geocon West Inc., May, 2018 (Phase I ESA). The Phase I ESA is available as Appendix G.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the future residents of the Project and the nearby residential land uses. The following provides an analysis of potential impacts during construction and operation of the Project.

Construction

The proposed Project would involve the construction of a mixed-use building with residential and commercial retail uses. 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. Through compliance with these regulatory requirements, no significant hazards to the public or environment would result in connection with the construction of the Project.

A portion of the Project Site (2322 E. 1st Street) is listed on the HAZNET database as "Soto Station" for removing approximately 500 tons of contaminated soil from the Site in 2004 and 2005. The soil was removed during the construction of the Metro subway tunnel and station. Though the Phase I ESA has revealed no evidence of recognized environmental conditions (RECs) in connection with the Project Site, there are records indicating underground storage tanks (USTs) were present on one or more portions of the adjacent property to the north now occupied by the Metro Soto Station.

The Phase I ESA recommended the preparation of Soil Vapor Study to determine if there are potential volatile organic compounds in soil vapor beneath the site. A Soil Vapor Study was prepared in September 2019 by Geocon West, Inc (see Appendix G). The results of the soil vapor survey indicate that benzene, perchloroethylene (PCE), and chloroform are present in soil vapor samples collected at the site, at concentrations which exceed their respective screening levels for soil vapor in a residential land use scenario. Based on this and as discussed in the soil vapor study, concentrations of these contaminants may pose an unacceptable risk to human health of future site residents, workers, and visitors via vapor intrusion into indoor air. The soil vapor study recommended that a soil vapor mitigation technology be integrated into the design of the proposed residential development to reduce the potential risk of soil vapor intrusion into the future structure. Therefore, a project design feature (HAZ-PDF-1) would be implemented, constructing a mitigation barrier below the slab to vent the vapors into the outdoor air. This barrier would reduce the potential exposure to potential contaminated soils and would not expose future residents, guests, workers, and transit users to hazardous material risks. As such, this impact would be less than significant.

Project Design Feature

PDF HAZ-1 To mitigate the potential risk of soil vapor intrusion into the proposed structure, the Project will incorporate a passive venting system into the design of the Project.

Operation

For the residential units and commercial retail, general household hazardous waste 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 and the commercial retail space would not involve the use, storage, transport, or disposal of hazardous wastes and substances. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant.

b) Would the project 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. The Phase I ESA reviewed Sanborn maps for the years 1888, 1890, 1894, 1906, 1921, 1949, and 1970 to obtain information pertaining to historical development and uses of the Project Site. Additionally, historical aerial photographs for the years 1923, 1928, 1938, 1948, 1952, 1964, 1972, 1977, 1983, 1989, 1994, 2002, 2005, 2009, 2010, 2012 were reviewed for indications of past land uses that had the potential to have impacted the Project Site through the use, storage or disposal of hazardous substances and/or petroleum. Table VI-10, Historical Observations summarizes information on the maps and photographs for the Project Site and nearby properties.

Table VI-10
Historical Observations

Year	Site	Adjacent Properties
Sanborn Maps		
1888	No structures or land uses are depicted on the Project Site.	No structures or land uses are depicted on the adjacent properties. E. 1st Street is depicted north of the Project Site.
1890	Conditions are similar to those depicted on the 1888 map	Conditions are similar to those depicted on the 1888 map except for dwellings depicted northeast of the Project Site beyond E. 1st Street and southwest of the Project Site, and S. Soto Street depicted east of the Project Site.
1894	Conditions are similar to those depicted on the 1890 map	Conditions are similar to those depicted on the 1890 map.
1906	Two dwellings and a stable are depicted on the Project Site.	Dwellings are depicted on the adjacent properties and the properties beyond E. 1st Street and S. Soto Street.
1921	Five dwellings, a shed, and an automobile outbuilding are depicted on the Project Site.	Dwellings and a store are depicted north of the Project Site beyond E. 1st Street. Dwellings and an automobile repair shop are adjacent to the northeast of the Project Site. Stores are depicted northeast of the Project Site beyond E. 1st Street. Dwellings, apartments, and stores are depicted east of the

Year	Site	Adjacent Properties
		Project Site beyond S. Soto Street. Dwellings with various outbuildings are depicted south, southeast, and east of the Project Site.
1949	Eight dwellings, a shed, two automobile outbuildings, a restaurant, a store, and a candy manufacturing shop are depicted on the Project Site.	Additional stores and dwellings are depicted north and northeast (beyond E. 1st Street), east (beyond S. Soto Street), south, southwest, and west of the Project Site. A restaurant is depicted northeast of the Project Site beyond E. 1st Street. Two dwellings, an automobile repair shop, a tire & battery shop, and a gas station are adjacent to the northeast of the Project Site.
1970	Conditions are similar to those depicted on the 1949 map except for two stores and a bakery are depicted in the northern portion of the Project Site.	Conditions are similar to those depicted on the 1945 map except for the following. Two "iron" structures are depicted adjacent to the northeast of the Project Site. The automobile repair shop, tire & battery shop, and gas station are not depicted northeast of the Project Site. Additional stores and a commercial structure are depicted north of the Project Site beyond E. 1st Street.
Aerial Photographs		
1923	Five residences with a few outbuildings were present on the Project Site.	Residences and commercial structures were north and northeast of the Project Site beyond E. 1st Street and east of the Project Site beyond S. Soto Street. Two residences and a commercial structure were adjacent to the northeast of the Site. Residences were south and southwest of the Project Site. Residences and commercial structures were west of the Project Site.
1928	The resolution of the photograph is poor; however, it appears conditions were similar to those observed on the 1923 photograph except for a commercial structure in the northern portion of the Project Site.	The resolution of the photograph is poor; however it appears conditions were similar to those observed on the 1923 photograph.
1938	Conditions were similar to those observed on the 1928 photograph except for additional structures in the northern and southwestern portions of the Project Site.	Conditions were similar to those observed on the 1928 photograph except that a newer commercial structure was adjacent to the northeast of the Project Site.
1948	The resolution of the photograph is poor; however it appears conditions were similar to those observed on the 1938 photograph.	The resolution of the photograph is poor; however it appears conditions were similar to those observed on the 1938 photograph.
1952	Conditions were similar to those observed on the 1948 photograph.	Conditions were similar to those observed on the 1948 photograph.

Year	Site	Adjacent Properties
1964	Conditions were similar to those observed on the 1952 photograph.	Conditions were similar to those observed on the 1952 photograph except newer commercial structures were adjacent to the northeast of the Project Site and north and northeast of the Project Site beyond E. 1st Street.
1972 & 1977	Conditions were similar to those observed on the 1964 photograph.	Conditions were similar to those observed on the 1964 photograph.
1983 & 1989	Conditions were similar to those observed on the 1972 and 1977 photographs.	Conditions were similar to those observed on the 1972 and 1977 photographs.
1994	Conditions were similar to those observed on the 1983 and 1989 photographs.	Conditions were similar to those observed on the 1983 and 1989 photographs.
2002	Conditions were similar to those observed on the 1994 photograph.	Conditions were similar to those observed on the 1994 photograph.
2005	The Project Site was a vacant lot.	Conditions were similar to those observed on the 2002 photograph except for a vacant lot adjacent to the northeast of the Project Site.
2009	The northern portion of the Project Site was part of the Metro Soto Station (under construction). The southern portion of the Project Site appears to have been used as a construction staging area.	Conditions were similar to those observed on the 2005 photograph except for Metro Soto Station under construction adjacent to the northeast of the Project Site.
2010 & 2012	The northern portion of the Project Site was part of the Metro Soto Station. The southern portion of the Project Site was a vacant lot.	Conditions were similar to those observed on the 2009 except for the Metro Soto Station adjacent to the northeast of the Project Site.

As discussed in impact VI. 9a, the soil vapor study recommended that a soil vapor mitigation technology be integrated into the design of the proposed residential development to reduce the potential risk of soil vapor intrusion into the future structure. Therefore, a project design feature (HAZ-PDF-1) would be implemented, constructing a mitigation barrier below the slab to vent the vapors into the outdoor air. This barrier would reduce the potential exposure to potential contaminated soils and would not expose future residents, guests, workers, and transit users to hazardous material risks. As such, this impact would be less than significant. Based on a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Oil and Gas Well Finder, the Project Site is located within the Boyle Heights (ABD) Oil Field.[38] However, no oil wells are present on site.[39]

[38] *California Department of Conservation, Division of Oil, Gas and Geothermal Resources, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder, accessed: August 2019.*

[39] *Ibid.*

According to the U.S. Environmental Protection Agency (EPA), the Project Site, being located in Los Angeles County, is situated within Radon Zone 2, with a predicted average indoor radon screening level between 2 and 4 picoCuries per Liter (pCi/L, moderate potential), which is below the 4.0 pCi/L action level set by the United States Environmental Protection Agency (USEPA).

The Project Site has been identified to be within a Methane Zone.[40] These areas pose a risk of methane intrusion emanating from geologic formations. Due to the existing potential environmental risk associated with construction in a Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City. Project development would be governed by the provisions of City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance includes requirements for site testing, methane mitigation systems, and ventilation systems.

Compliance with applicable laws and regulations during construction and operation of the Project would reduce the impacts associated with the potential release of hazardous materials to less than significant and no mitigation measures are required.

c) Would the project 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. Breed Street Elementary School is located within 480 feet (0.09 mile) of the Project Site, at 2226 E 3rd Street. Theodore Roosevelt School is located approximately 0.21 mile south of the Project Site, at 456 S Mathews Street. As discussed in response to Thresholds XI.9a and 9b above, potentially hazardous materials such as oil or fuel utilized by heavy-duty construction equipment, may be utilized during construction and would be required to comply with local, state, and federal policies for handling such materials and equipment properly. As discussed in impact VI. 9a, the soil vapor study recommended that a soil vapor mitigation technology be integrated into the design of the proposed residential development to reduce the potential risk of soil vapor intrusion into the future structure. Therefore, a project design feature (HAZ-PDF-1) would be implemented, constructing a mitigation barrier below the slab to vent the vapors into the outdoor air. This barrier would reduce the potential exposure to potential contaminated soils and would not expose future residents, guests, workers, and transit users to hazardous material risks. Potential soil vapor intrusion would have no impact on the adjacent schools. As discussed in Section III, *Air Quality*, emissions generated by construction of the Project would be below SCAQMD LSTs and would not be significant.

Therefore, given that construction and operational activities would be required to comply with local, state, and federal policies for handling any minor hazardous materials and criteria pollutant emissions would be below SCAQMD threshold levels, impacts associated with potential hazardous emissions during construction and operation would be less than significant.

[40] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

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

Less Than Significant Impact. The Project Site is not a City designated Hazardous Waste/Border Zone Property.[41] As discussed previously, a portion of the Project Site (2322 E. 1st Street) is listed on the HAZNET database as "Soto Station" for removing approximately 500 tons of contaminated soil from the Site in 2004 and 2005. The soil was removed during the construction of the Metro subway tunnel and station. Though the Phase I ESA has revealed no evidence of RECs in connection with the Project Site, there are records indicating USTs were present on one or more portions of the adjacent property to the north now occupied by the Metro Soto Station. There are also records indicating that contaminated soil was removed during the construction of the Metro Soto Station. It is unknown if the soil removal was associated with the removal of the USTs or if contaminated soil remains beneath portions of the Soto Station outside of the areas excavated during construction. Based on the extensive excavation that was performed during construction of the subway it is possible that potential soil contamination for the historic uses of the property would have been removed; however, without records documenting the extent of the removal, the threat of a vapor encroachment risk to the Project Site cannot be ruled out. As discussed in impact VI. 9a, the soil vapor study recommended that a soil vapor mitigation technology be integrated into the design of the proposed residential development to reduce the potential risk of soil vapor intrusion into the future structure. Therefore, a project design feature (HAZ-PDF-1) would be implemented, constructing a mitigation barrier below the slab to vent the vapors into the outdoor air. This barrier would reduce the potential exposure to potential contaminated soils and would not expose future residents, guests, workers, and transit users to hazardous material risks.

Because the Project would not be located on a site with potential to create a significant hazard to the public or environment, this impact would be less than significant.

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

No Impact. The Hawthorne Municipal Airport is the closest airport to the Project Site, located approximately 10.2 miles to the south. In addition, the Project Site is not located within an airport land use plan. As such, the Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur and no mitigation measures are required.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. There are no critical facilities, lifeline systems, or disaster routes in the immediate vicinity of the Project Site.[42,43] However, E. 1st Street and S. Soto Street are classified as

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[41] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2017.*

[42] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

[43] *Ibid.*

Secondary Disaster Routes by Los Angeles County.[44] Nonetheless, as discussed in Section VI.17, Transportation, below, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, impacts would be less than significant and no mitigation measures are required.

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

No Impact. The Project Site is located in a highly urbanized area of Boyle Heights, and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone;[45] nor is the Project Site within a wildland fire hazard area.[46] Therefore, no impact would occur relative to exposure to wildfire hazards and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant with mitigation incorporated and, therefore, would not substantially contribute to a cumulative impact. Furthermore, local municipalities will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State, and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant and no mitigation measures are required.

10. HYDROLOGY AND WATER QUALITY

The following analysis utilizes information provided in the *Phase I Environmental Site Assessment*, prepared by Geocon West Inc., May, 2018 (Phase I ESA). The Phase I ESA is available as Appendix G.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact.

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[44] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles West Area, website: http://dpw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf, accessed: August 2019.*

[45] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[46] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

Construction

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, National Pollution Discharge Elimination System (NPDES) No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[47] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan (SWPPP). Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project would be less than significant and no mitigation measures are required.

Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.[48] This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local

[47] *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

[48] *Ibid., page 97 et seq.*

regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact.

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. According to the Project's Phase I ESA, groundwater within the vicinity of the Project Site ranged from 31.48 to 35.51 feet in October 2013. As the Project does not plan to drill more than 11 feet into the ground, no dewatering (i.e., removal of groundwater) during construction is anticipated.

Additionally, operation of the Project would not interfere with any groundwater recharge activities within the area. The Project Site is located in a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. The Project Site contains minimal areas of landscaping. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. Even so, construction and operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures are required.

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

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

Less Than Significant Impact. As discussed above, the Project would be designed to comply with the City of Los Angeles's LID design standard. The proposed stormwater BMPs would require rainwater harvesting and/or bio-filtration flow-through planters, and the entirety of the building's roof drains will be diverted to the proposed stormwater BMPs and the overflow discharge will be discharged to S. Soto Street or E. 1st Street a curb drain or parkway drain. Further, Project construction would comply with applicable NPDES

and City requirements including those requiring the preparation of a Project-specific SWPPP. Pursuant to the LID Ordinance, the Project would be required to capture and manage the first threequarters of an inch of runoff flow during storm events as defined in the City's BMPs. As described earlier, the rainwater harvesting and/or bio-filtration flow-through planters would meet the City of Los Angeles' stormwater capture and reuse criteria and LID design standards. The Project would result in less than significant impacts associated substantial erosion or siltation on-or off-site and no mitigation is required.

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?

Less Than Significant Impact. The following response addresses Thresholds c.II and C.III. Runoff associated with the Project would be directed in non-erosive drainage devices to either landscaped areas for evaporation and/or directed to the existing City storm drain system. The Project would be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that expand the review of the SUSMP discussed above. Incorporation of these features would minimize the stormwater runoff from the Project Site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project Site. Therefore, impacts would be less than significant and no mitigation measures are required.

iv) Impede or redirect flood flows?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain.[49] The Project is a mixed-use project that would not redirect or cause impediment or redirection of flood flows. Therefore, no impact would occur and no mitigation measures are required.

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

No Impact. As discussed above, the Project Site is not located with a 100-Year or 500-Year flood plain.[50] Additionally, the Project Site is not located in a potential inundation area or an area potentially impacted by a tsunami.[51] There are also no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche. As such, the Project is not in a flood hazard, tsunami, or seiche zone and there is no potential for risk of the release of pollutants due to project inundation. No impact would occur and no mitigation measures are required.

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[49] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, Adopted November 1996.*

[50] *Ibid.*

[51] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996.*

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the LID ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a SWPPP in accordance with the NPDES permit. The SWPPP incorporates BMPs in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures. The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. Pursuant to the LID Ordinance, however, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's LID BMPs, through one or more of the City's preferred LID improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

Further, the related projects would be subject to the NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

The cumulative impacts context for flood hazards is the corporate boundary of City of Los Angeles, which provides emergency response services for flood events and participates in the National Flood Insurance Program (NFIP). The NFIP is a Federal program enabling property owners in participating communities to purchase protection against property losses due to flooding.

All related projects are subject to restrictions and requirements as part of the City's existing permitting process and a detailed review of the City of Los Angeles General Plan Safety Element would be conducted as part of the plan check process. Related projects within the 100-year flood plain or floodway would be required to implement appropriate flood plain management measures in the design of new buildings. Compliance with these existing regulatory requirements would ensure the any related projects would not place housing within a flood hazard area without incorporating proper measures and reducing this impact to less than significant and would not be cumulatively considerable.

Similarly, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. The Project would include rainwater harvesting and/or bioinfiltration flow-through planters as a BMP. The Los Angeles Department Public Works would review the Project to ensure that sufficient local and regional drainage capacity is available. The Project would not be located in a 100-Year or 500-Year flood plain or near an inundation area subject to seiche or tsunami. The Project's contribution

to cumulative impacts to hydrology and water quality and flooding hazards would not be cumulatively considerable. Impacts would be less than significant.

11. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. The Project Site is located in a highly urbanized area and two of the Project Site's parcels are currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. The Project Site is relatively flat and is surrounded by adjacent residences to the south, residences and commercial uses to the west across an alleyway, residences to the east across S. Soto Street, and residences and commercial uses to the north across E. 1st Street.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Since the Project would not physically disrupt or divide the surrounding established community, no impact would occur and no mitigation measures are required.

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

Less Than Significant Impact. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Site. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant and no mitigation measures are required.

Regional Plans, Policies, Regulations

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

SCAG Regional Comprehensive Plan

SCAG has prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air

quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2016–2040 RTP/SCS (discussed below).

SCAG 2016–2040 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.

On April 7, 2016, the Regional Council of SCAG adopted the 2016–2040 RTP/SCS. For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. The 2016–2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Federal Clean Air Act. As such, the 2016–2040 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2016-2040 time-frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero- emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2016–2040 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development.

The 2016–2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play, and how they will move around. It is designed to promote

safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2040. More importantly, the 2016–2040 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2016–2040 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

A detailed discussion of the Project's consistency with the 2016–2040 RTP/SCS is included in Section III, SCEA Criteria and Transit Priority Project Consistency Analysis. As discussed there, the Project would be substantially consistent with the applicable 2016–2040 RTP/SCS policies and with the land use designation, density, and building intensity identified in the 2016–2040 RTP/SCS for the area in which the Project Sites are located. Additionally, as discussed below in Section VI.14, the Project's housing, population, and employee estimates would be consistent with SCAG growth projections. Therefore, no significant impacts regarding consistency with this plan would occur.

Local Plans, Policies, Regulations

The discussion below provides a discussion of the plans, policies, and regulations established by the City of Los Angeles.

Los Angeles General Plan

The City's General Plan serves as a blueprint for the future, prescribing policy goals and objectives to shape and guide the physical development of the City. In the State of California, all cities are required to develop a General Plan. A General Plan is a comprehensive policy document that informs future land use decisions. It establishes land use designations and policies that identify a range of zoning options that can be applied to property. These policies assist decision makers as they review planning approvals for a new project or consider a proposed ordinance or policy. By identifying land use categories and corresponding zones, the General Plan provides the foundational guide for planning, outlining how land is used and how the City allocates its resources. The General Plan is, however, more than just the legal basis for all local land use decisions; it is the vision for how the City will evolve, reflecting the values and priorities of its communities. The following provides a discussion of the Project's consistency with elements of the General Plan.

General Plan Framework Element

Adopted in December 1996, and readopted in August 2001, the City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan.[52] The General Plan Framework is one of the General Plan Elements and sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation,

[52] *City of Los Angeles Framework Element of the General Plan, website: https://planning.lacity.org/cwd/framwk/fwhome0.htm, accessed: August 2019.*

infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation and encourages new development to be developed near transit. The Framework Element also calls for commercial development along the City's arterial corridors to be intensified with new projects that integrate commercial and residential uses.

The consistency of the Project with applicable objectives and policies in the General Plan Framework is presented in Table VI-11, Project Consistency with Applicable Objectives of the Framework Element. As shown, the Project would be consistent with the applicable objectives in the General Plan Framework and impacts related to consistency with this document would be less than significant.

Table VI-11
Project Consistency with Applicable Objectives of the Framework Element

Objective/Policy[a]	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project would develop a mixed-use building with affordable residential units and ground floor commercial space which would contribute to the diversity of land uses in the area, and would support the needs of the City's existing and future residents, businesses, and visitors.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project Site is located within a TPA and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40. The Project would also include 66 bicycle parking spaces including 54 long term spaces and 12 short term spaces. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space consistent with existing land uses in the Boyle Heights Community Plan area, which includes a mix of commercial, residential, and office land uses. The Project would provide housing on a site that is currently vacant. The Project would also help to revitalize the area that is now along a transit corridor.
Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space within a TPA, and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40. The Project would not encroach on low-density neighborhoods.
Objective 3.17: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The Project would provide ground floor commercial uses within the Metro Soto Station Plaza, which would enhance pedestrian activity.

Table VI-11
Project Consistency with Applicable Objectives of the Framework Element

Objective/Policy[a]	Project Consistency
Housing Chapter	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space within a TPA, and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space within a TPA, and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The Project would provide ground floor commercial uses along with residential uses which would serve to establish a balance of commercial development.

[a] City of Los Angeles, Citywide General Plan Framework Element, readopted August 2001.

Boyle Heights Community Plan

The City of Los Angeles contains 35 community plans which comprise the Land Use Element of the General Plan, and the Boyle Heights Community Plan is one of those plans, which the Project Site is located in. The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Boyle Heights Community Plan guides land uses on the Project Site and in the surrounding areas within the Boyle Heights Community Plan Area. This current Community Plan sets forth planning goals and objectives to maintain the community's distinctive character.

The Project's consistency with the applicable objectives and policies of the Boyle Heights Community Plan is presented in Table VI-12, Project Consistency with the Boyle Heights Community Plan. The Project Applicant is requesting a General Plan Amendment (GPA) per Los Angeles Municipal Code (LAMC) Section 11.5.6 to change the Land Use Designation from Low Medium II to Highway Oriented Commercial/Limited Commercial. Although the Applicant is requesting this GPA, this change would not substantially affect land use consistency in the Boyle Heights Community Plan Area, as the Project parcels are designated for commercial and residential uses and are proposed for these uses. Further, this GPA would be consistent

the land use goals and intent of the Boyle Heights Community Plan Area, which encourages increased provision of residential uses in multi-story buildings along the corridors while preserving ground floor spaces for neighborhood serving commercial uses. As shown in Table VI-12, the Project would be consistent with the applicable objectives and policies and impacts related to consistency with this plan would be less than significant.

Table VI-12
Project Consistency with the Boyle Heights Community Plan

Objective/Policy[a]	Project Consistency
Residential	
Objective 2: Provide new housing opportunities that accommodate a range of income needs, provide public amenities, and maximize the opportunities for individual choice.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space on a currently vacant portion of the site.
Policy 4: Medium density housing be located near commercial corridors where access to public transportation and shopping services is convenient and where a buffer from, or a transition between, low-density housing can be achieved to the extent feasible	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space within a TPA, and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40. The Project would not encroach on low-density neighborhoods.
Commercial	
Objective 1: Conserve and strengthen viable commercial development in the Community and to provide additional opportunities for new commercial development and services.	**Consistent.** The Project would include ground floor commercial uses that would serve the Project community and the Metro Soto Station Plaza.
Objective 2: To provide a range of commercial facilities at various locations to accommodate the shopping needs of residents, including persons of restricted mobility, and to provide increased employment opportunities within the Community.	**Consistent.** The Project would include ground floor commercial uses that would increase employment opportunities. Additionally, the Project would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40.
Objective 4: To improve the compatibility between commercial and residential uses.	**Consistent.** The Project would include both residential and commercial uses and would be located near numerous transit opportunities.
Policy 5: That neighborhood markets and retail and service establishments oriented to the residents be retained throughout the Community, within walking distance of residents.	**Consistent.** The Project would provide a mixed-use development with affordable residential units and ground floor commercial space. These uses would be within walking distance of existing residential and commercial uses as well as the Metro Soto Station Plaza.

[a] City of Los Angeles Department of City Planning, Boyle Heights Community Plan, adopted November 10, 1998.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared and updated pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA.[53] The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods. The 2013–2021 Housing Element, an update to the previous 2006–2014 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013. Policies of note include Policy 1.1.3, which states the City should "[f]acilitate new construction and preservation of a range of housing types that address the particular needs of the city's households." Also, Policy 1.1.4 states that the City should "[e]xpand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards." The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage infill development and increase density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit.

The Housing Element encourages new construction of a range of different housing types that address the needs of the City's households. Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate-income households.

The remaining 56.8 percent of the needed housing units consist of 13,728 moderate-income units (16.8 percent), 12,435 low-income units (15.2 percent), 10,213 very-low-income units (12.5 percent), and 10,213 extremely-low-income units (12.5 percent).[54]

The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63 affordable units and one market-rate manager's unit, 2,443 square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. Thus, the Project would support meeting the City's RHNA allocations by contributing to both the overall supply of housing as well as contributing to the availability of housing for low income households. The Project would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40.

Therefore, the Project would be substantially consistent with the Los Angeles General Plan Housing Element and impacts would be less than significant.

City of Los Angeles Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan),[55] which was adopted in January 2016, is a comprehensive update of the Transportation Element, which in part includes the City's classification system for roadways. The Mobility Plan provides revised street standards in an effort to provide a more enhanced balance between

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[53] *City of Los Angeles 2013-2021 Housing Element, website: https://planning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm, accessed: August 2019.*

[54] *Ibid.*

[55] *City of Los Angeles Mobility Plan 2035 An Element of the General Plan, website: https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf, accessed: August 2019.*

traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Various modes of travel are encouraged by the Mobility Plan, including walking, biking and using public transit. Key objectives within the Mobility Plan are as follows:

> **Policy 2.3:** Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
>
> **Policy 3.1:** Recognize all modes of travel, including pedestrian, bicycle, transit and vehicular modes including goods movement as integral components of the City's transportation system.
>
> **Policy 3.3:** Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.
>
> **Policy 3.4:** Provide all residents, workers and visitors with affordable, efficient, convenient and attractive transit services.
>
> **Policy 3.8:** Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.
>
> **Policy 4.13:** Balance on-street and off-street parking supply with other transportation and land use objectives.
>
> **Policy 5.2:** Support ways to reduce vehicle miles traveled (VMT) per capita.
>
> **Policy 5.4:** Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

The Project would support the Mobility Plan policies listed above as it promotes a balanced transportation system by locating a mixed-use, affordable housing project on an urban infill site located in an area that has an existing mix of commercial, residential, office, and educational uses. The Project Site is also located within a TPA and would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40. The Project encourages pedestrian and bicycle activity by locating new residents, employees and visitors in close proximity to public transit and services. Project residents, employees and visitors would have the option to walk, ride bicycles or use public transit to access jobs and services in the surrounding neighborhood and nearby centers such as Downtown Los Angeles.

The Project would include 66 bicycle parking spaces including 54 long term spaces and 12 short term spaces, adhering to the Code requirements for bicycle parking. As such, the Project would provide convenient, secure and well-maintained bicycle parking facilities that would encourage the use of bicycles by Project residents and visitors and a reduction in the use of vehicular travel. Because the Project would be consistent with these applicable policies of the Mobility Plan, impacts would be less than significant.

City of Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Zoning Code establishes objective zoning and development standards, but was not adopted to avoid or mitigate environmental impacts. A brief discussion of the Project's consistency with the Zoning Code is provided below.

The LAMC establishes the zoning for the four parcels along 1st Street as C2-1-CUGU (Commercial Zone with a Clean Up Green Up (CUGU) overlay and the two southern parcels fronting Soto Street as RD-1.5-1-CUGU (Restricted Density Multiple Dwelling Zone, Height District 1 with a Clean Up Green Up (CUGU) overlay). The Project Applicant is requesting a JJJ complaint Vesting Zone Change per LAMC Section 12.32(Q) from C2-1-CUGU and RD1.5-1-CUGU to [T][Q]C2-1-CUGU.

The RD-1.5 zone allows for multi-family dwellings; however, the Project includes commercial development that is not a permitted use in the RD zone. The Project Site is in transit-rich and pedestrian accessible locations with connectivity to many areas in the City. The Project would encourage the use of mass transit, walking and bicycling since the Project would locate mixed-use residential and commercial development on a site that is located near numerous bus lines, a Metro Rail Station, and bike lanes, which is consistent with City and region-wide goals and strategies. As concluded throughout this SCEA analysis, the Project would not result in significant environment impacts; therefore, the commercial portion of the Project would not result in conflicts with surrounding land uses. Upon approval of the proposed zone change, the Project would be consistent with applicable zoning, and potential impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. With respect to community division, it is unknown whether or not any of the related projects or other development in the Community Plan Area would divide an existing community. However, as the Project would have no impact with respect to community division and habitat conservation plans, it would not contribute to a cumulative impact.

Development of the related projects is expected to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

12. MINERAL RESOURCES

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

No Impact. Based on a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Oil and Gas Well Finder, the Project Site is located within the Boyle Heights (ABD) Oil Field.[56] However, no oil wells are present on site.[57] Additionally, the Project Site is not within a surface mining district or Mineral Resource Zone (MRZ) identified as having potential significant mineral deposits (such as MRZ-2) which is classified as areas that contain identified mineral resources.[58] The Project would not affect ongoing extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. The Project would not involve mineral extraction activities, nor are any such activities

[56] *California Department of Conservation, Division of Oil, Gas and Geothermal Resources, Well Finder, website: https://maps.conservation.ca.gov/doggr/wellfinder, accessed: August 2019.*

[57] *Ibid.*

[58] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.*

presently occurring on the Project Site. Therefore, no impact would occur and no mitigation measures are required.

b) Would the project 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. As mentioned previously, there are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within a surface mining district or MRZ-2 zone. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. It is unknown whether or not any of the related project sites contain mineral resources. However, as the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Therefore, there would be no cumulative impact on mineral resources and no mitigation measures are required.

13. NOISE

The following analysis utilizes information provided in the *Air Quality and Noise Analyses, Los Lirios Mixed-Use Project*, prepared by Pomeroy Environmental Services, April 2019 (Air Quality and Noise Report). The Air Quality and Noise Report is available as Appendix C.

a) Would the project result in the 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

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

Construction of the Project would require the use of heavy equipment for grading foundation preparation, the installation of utilities, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table VI-13, Noise Range of Typical Construction Equipment, and Table VI-14, Estimated

Project Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

The noise levels shown in Table VI-14 represent composite noise levels associated with the construction activities that will be carried out by the Project, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction in a development such as the Project. As shown in Table VI-14, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor.

Table VI-13
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet[a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Backhoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table VI-14
Estimated Project Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

To identify the existing ambient noise levels in the general vicinity of the Project Site, noise measurements were taken with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1.[59] The measured noise levels are shown in Table VI-15, Existing Ambient Daytime Noise Levels. See Appendix C for locations of sensitive receptors. The nearest noise sensitive receptors to the Project Site are:

- adjacent residences to the south;
- residences to the west (20 feet);
- residences to the east (85 feet);
- historic use to the east (87 feet);
- residences to the north (150 feet);
- church use to the east (300 feet);
- church use to the southwest (330 feet);
- library to the west (445 feet);and
- school use to the southwest (480 feet).

[59] *This noise meter meets the requirement specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade.*

Table VI-15
Existing Ambient Daytime Noise Levels

No.	Location	Primary Noise Sources	Noise Levels[a]		
			L_{eq}	L_{max}	L_{min}
1	East frontage of the Project Site along S. Soto Street, near residential receptors.	Traffic, pedestrian, and residential activity along S. Soto Street.	68.8	81.4	53.7
2	North of the Project Site along E. 1st Street.	Traffic and pedestrian activity along E 1st Street.	66.7	75.8	57.2
2	Southwest from the Project Site along S. Breed Street, near church and school sensitive receptors.	Traffic, pedestrian, residential, and school activity along Breed Street.	61.0	79.1	49.2
See Appendix C for noise data sheets.					

Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those previously listed above in Table VI-14. Specifically, based on the data provided in Table VI-14, construction noise levels at the residences within 50 feet could reach 86 dBA compared to the existing measured noise levels of 68.8, 66.7, dBA and 61.0 dBA for the area. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the Project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., foundation work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

Similar to other development projects in the City, the Project would comply with the City's existing noise regulations to ensure noise impacts would be less than significant. LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday.[60] The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, compliance with construction noise standards is achieved if all technically feasible noise reduction measures are implemented. According to the LAMC, technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.[61] Although the estimated construction-related noise levels associated with the Project could periodically exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05, the Project would implement all technically feasible reduction measures in compliance with the standards set forth in LAMC Section 112.05 (see RCM NOI-1 through RCM NOI-7 below).

[60] *Los Angeles Municipal Code, Section 41.40.*

[61] *Los Angeles Municipal Code, Section 112.05.*

Specifically, the use of barriers such as plywood structures, flexible sound control curtains, or intervening construction trailers, could reduce line-of-sight noise levels by approximately 10 dbA.[62] And, with the incorporation of the LAMC-required noise reduction techniques, construction noise levels could be reduced by up to approximately 20 dBA.[63] As previously stated, construction noise levels could reach up to approximately 86 dBA Leq. However, with the reduction of approximately 20 dBA per code-required noise reduction techniques (see RCM NOI-1 through RCM NOI-7), the resulting construction noise levels would be reduced to approximately 66 dBA Leq. These noise levels would not exceed the noise threshold of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05. With the code-required reduced construction noise of 66 dBA, the construction noise levels would be substantially similar (and potentially less than), the existing ambient noise in the heavily urbanized location.

Thus, based on the provisions set forth in LAMC 112.05, implementation of the following regulatory compliance measures would ensure the Project be consistent with, and not violate the provisions of, the LAMC. Thus, the Project would comply with the City's existing noise regulations to ensure construction noise impacts would be less than significant. The regulatory compliance measures per LAMC 41.40 and 112.05 would include the following regulatory compliance measures.

Regulatory Compliance Measures

RCM NOI-1 The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 (see LAMC Section 112.05), and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels.

RCM NOI-2 Construction shall be restricted to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

RCM NOI-3 Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

RCM NOI-4 Noise-generating equipment operated at the Project Site shall be equipped with the most effective and technologically feasible noise control devices, such as mufflers, lagging (enclosures for exhaust pipes), and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

RCM NOI-5 Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening

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[62] *Based on a review of Table 4 of the FHWA Noise Barrier Design Handbook (July 14, 2011), the design feasibility of a sound barrier that reduces noise by 5 dBA is considered "simple" and a reduction of up to 10 dBA as "attainable." And, reductions of 15 and 20 dBA are considered "very difficult" and "nearly impossible," respectively.*

[63] *Estimate based on information from the United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971. Per Table V, Noise Control For Construction Equipment therein, use of improved mufflers/silencers would achieve approximately 10 dBA reduction and enclosures/barriers blocking line-of-sight would achieve approximately 10 dBA reduction. While the additional measures would reduce noise, it should be noted that all reductions would not be wholly additive, but would be incremental, and therefore have conservatively not been quantified in the estimated reduction.*

construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

RCM NOI-6 Barriers such as, but not limited to, plywood structures or flexible sound control curtains shall be erected around the perimeter of the construction site, and around stationary equipment as feasible (i.e., generators, air compressors, etc.), to minimize the amount of noise during construction on the nearby noise-sensitive uses. Perimeter barriers shall be at least 8 feet in height and constructed of materials achieving a Transmission Loss (TL) value of at least 20 dBA, such as ½ inch plywood.[64]

RCM NOI-7 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048 (see LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Operational Noise

A significant impact may occur if the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in Table VI-16, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

As such, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a Leq standard of 5 dBA over ambient conditions as constituting a LAMC violation.

[64] *Based on the FHWA Noise Barrier Design Handbook (July 14, 2011), see Table 3, Approximate sound transmission loss values for common materials.*

Table VI-16
Community Noise Exposure

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] 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.

[b] 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 will normally suffice.

[c] 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.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the L.A. CEQA Thresholds Guide, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts are assumed to be less than significant. As detailed in the Transportation Study, the Project is estimated to add 496 daily trips, including 48 morning peak hour trips and 41 afternoon peak hour trips to a highly developed area of the City that is already impacted by heavy traffic noise. Moreover, the highest Project-related trip increase would occur at intersection number 3 (S. Soto Street and E. 1st Street) during the AM peak hour with 36 peak hour trips. When compared to the existing 2,837 vehicle trips occurring at

intersection number 3 during the AM peak hour, it is clear that the Project would not double the traffic volumes on any roadway segment in the vicinity of the Project Site. As such, the Project would not increase roadway noise levels by 3 dBA and, thus, traffic noise impacts would be less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed. The design of this equipment would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

Parking Noise

Noise would be generated by activities within the proposed subterranean parking garage. Sources of noise would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking area would fluctuate with the amount of automobile and human activity. It is anticipated that parking related noise would be less than the existing street parking noise as the Project proposes enclosed parking which would reduce noise impacts to off-site uses. In addition, parking-related noise generated by motor driven vehicles within and around the Project Site is regulated under the LAMC. Specifically, with regard to motor-driven vehicles, LAMC Section 114.02 prohibits the operation of any motor-driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. As such, noise impacts associated with the Project's parking area would be less than significant.

In addition, on-site residences would not be adversely impacted by elevated ambient urban noise levels because the Project would be constructed to meet and exceed Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Specifically, as required by Title 24, the Project would be designed and constructed to ensure interior noise levels would be at or below a CNEL of 45 dBA in any habitable room of the project. Given the existing measured noise levels are 68.8, 66.7, dBA and 61.0 dBA for the vicinity, and the approximate 30 dBA exterior-to-interior noise reduction for new residential construction,[65] it is clear that standard construction methods and materials would achieve interior noise levels at or below 45 dBA. As such, impacts associated with interior noise levels at the proposed residences would be less than significant.

b) Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or

[65] *Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings requires substantial building insulation and windows which reduces exterior to interior noise transmission.*

the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Construction activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[66]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or

[66] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.*

- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses. Table VI-17, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction.

Table VI-17
Vibration Source Levels for Construction Equipment

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Note: in/sec = inches per second
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration impacts upon existing off-site structures, a historic Victorian house (i.e., Peabody Werden Duplex) (Receptor 4) is located 87 feet across from the Project Site along S. Soto Street. According to the FTA, ground vibration from construction activities do not often reach the levels that can damage structures.[67] Per the FTA, there are four general building categories: I. Reinforced-concrete, steel or timber (no plaster), II. Engineered concrete and masonry (no plaster), III. Non-engineered timber and masonry buildings, and IV. Buildings extremely susceptible to vibration damage. This analysis conservatively considers Receptor 4 a Category IV building (buildings extremely susceptible to vibration damage). The FTA identifies a 0.12 PPV (in/sec) construction vibration criteria for Category IV. Based on the reference data provided in Table VI-17, worst-case construction vibration levels would be less than 0.015 PPV (in/sec) for receptors located farther than 70 feet from the source. As Receptor 4 is located approximately 87 feet from the Project Site, the construction vibration would not have the potential to exceed the FTA's 0.12 PPV (in/sec) standard for Category IV buildings.

In addition, there are residential uses immediately adjacent to the Project Site. Conservatively, this analysis assumes the adjacent uses best fit under Category III, Non-engineered timber and masonry building. The FTA identifies a 0.20 PPV (in/sec) construction vibration criteria for Category III. Based on the reference data provided in Table VI-17, worst-case construction vibration levels at adjacent locations could have the potential to exceed the FTA's 0.20 PPV (inches per second) construction vibration criteria for Category III. (Non-engineered timber and masonry building). The Project would comply with the City's

[67] *FTA, Transit Noise and Vibration Impact Assessment, Final Report, 2006, see page 12-10.*

existing construction vibration regulations. The Project would implement RCM NOI-8 , which would ensure all construction work would be performed in accordance with Section 91.3307.1 (Protection Required) of the LAMC. Specifically, Section 91.3307.1 (Protection Required) states adjoining public and private property shall be protected from damage during construction, remodeling and demolition work.[68] Protection must be provided for footings, foundations, party (i.e., shared) walls, chimneys, skylights, and roofs. Provisions shall be made to control water runoff and erosion during construction activities. For excavations, adjacent property shall be protected as set forth in Section 832 of the Civil Code of California. Prior to the issuance of any permit, which authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the site shall provide the Department of Building and Safety with evidence that the adjacent property owner or owners have been given a 30-day written notice of the intent to excavate. This notice shall state the depth to which the excavation is intended to be made and when the excavation will commence. This notice shall be by certified mail, return receipt requested. The Project would implement RCM NOI-8 (incorporating a structure monitoring program), ensuring the Project would comply with all regulatory requirements (i.e., Section 91.3307.1 of the LAMC and Section 832 of the Civil Code of California).

Regulatory Compliance Measure

RCM NOI-8 All construction work shall be performed in accordance with Section 91.3307.1 (Protection Required) of the LAMC and Section 832 of the Civil Code of California. Compliance with these standards will ensure all adjacent property shall be protected from damage during construction. The Project Applicant shall complete a structural monitoring program for the adjacent uses during construction including the following steps and procedures:

- Prior to start of construction, the Applicant shall retain the services of a structural engineer to visit the adjacent uses to inspect and document the apparent physical condition of the buildings, including but not limited to the building structure, interior walls, and ceiling finishes. In addition, the structural engineer shall establish baseline structural conditions of the buildings and prepare a shoring design.
- The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the building during construction. The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.17 inch/second (PPV), and a regulatory level of 0.20 inch/second (PPV). The system shall also provide real-time alert when the vibration levels exceed the two preset levels.
- In the event the warning levels above are triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.
- In the event the regulatory levels above are triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of

[68] *Los Angeles Municipal Code, Section 91.3307.1.*

the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.

In the event damage occurs to an adjacent use due to construction vibration, such materials shall be repaired and restored to previous condition as feasible.

With respect to human annoyance resulting from vibration generated during construction, the sensitive receptors located in the vicinity of the Project Site could be exposed to increased vibration levels. Based on the data provided in Table VI-17, the adjacent residences could experience vibration levels of 87 VdB. As such, the 80 VdB residential annoyance threshold could be exceeded at these off-site locations during worst-case construction activity. However, it should be noted that vibration levels experienced in the Project vicinity would be temporary and intermittent, and would be reduced when the construction activities are located toward the center of the Project Site. As stated previously, the Project would comply with the City's existing construction LAMC regulations, which would protect adjacent uses from damage. Furthermore, consistent with the requirements of LAMC Section 112.05, construction activities would be compliant with the LAMC standards if all technically feasible noise reduction measures are implemented. The construction noise regulatory compliance measures RCM NOI-1 through RCM NOI-7 would also serve to reduce construction vibration levels to the maximum extent feasible. As such, human annoyance impacts with respect to construction vibration would be less than significant.

Operational Vibration

The Project involves the construction and operation of residential and commercial uses and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring on-site and in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project 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 Project Site is not located in the vicinity of a private airstrip. The Hawthorne Municipal Airport is the closest airport to the Project Site, located approximately 10.2 miles to the south. In addition, the Project Site is not located within an airport land use plan. As such, the Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with the related projects would result in an increase in construction noise, traffic noise, as well as on-site stationary noise sources in an already urbanized area of the City. With respect to construction impacts, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. Operation is anticipated to commence in 2021. As such, albeit speculative, even conservatively assuming overlapping construction schedules, a potential cumulative noise impact would not occur due to the distance of the

Project Site with other related projects which have not yet been constructed as construction noise from the Project and each related project (that has not yet been built) would be localized. Similar to the Project, the related projects would be required to comply with the City's Noise Ordinance as well as mitigation measures that may be prescribed pursuant to CEQA that require significant impacts to be reduced to the extent feasible. As such, it is anticipated that the cumulative construction noise impact would be less than significant.

With respect to cumulative traffic noise impacts, it should be noted that the Project's traffic noise impacts are based on the predicted traffic volumes presented in the Transportation Study. Based on the Project's estimated trip generation, the Project would not double the traffic volumes on any roadway segment or study intersection in the Project Site vicinity. It is unknown whether or not any of the related projects would double the traffic volumes on any roadway segment or study intersection. If there were a noise impact, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above.

The Project and related projects would be compliant with LAMC Section 112.02 which limits stationary-source noise from items such as roof-top mechanical equipment. As such, operational noise levels would be less than significant at the property line for each related project. For this reason, on-site operational noise produced by any related project would not result in a substantial or noticeable additive increase to Project-related on-site operational noise levels. As such, it is anticipated that the cumulative operational noise impact would be less than significant.

With respect to groundborne vibration impacts during construction, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. Similar to the Project, the related projects would be required to comply with the City's Noise Ordinance as well as mitigation measures that may be prescribed pursuant to CEQA that require significant impacts to be reduced to the extent feasible. As such, it is anticipated that the cumulative construction vibration impact would be less than significant.

As discussed above, the groundborne vibration associated with the Project's operation would not generate excessive groundborne vibration levels. It is reasonably assumed that the related projects would not include operational uses that result in excessive groundborne vibration levels which may cause a cumulative impact. As such, it is anticipated that the cumulative operational vibration impact would be less than significant.

14. POPULATION AND HOUSING

a) Would the project 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. As part of its comprehensive planning process for the Southern California region, SCAG, the MPO for Southern California with exception to San Diego County, has divided its jurisdiction into 14 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles, the City of San Fernando, and a portion of unincorporated Los Angeles County. However, the numbers discussed herein pertain only to the City of Los Angeles. Based on the regional growth projections in the 2016–2040 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 residents, 1,325,500 total housing units, and 1,696,400 employees. Moreover, SCAG estimates the population of the City will

increase to 4,609,400 residents, 1,690,300 housing units, and 2,169,100 employees by 2040, a 19.9 percent, 27.5 percent, and 28.9 percent increase from the 2012 estimates, respectively.

The Project's construction activities would create temporary construction-related jobs. In particular, most construction projects of this size and nature are completed in a timely manner and require specialized workers at various time frames, as needed, from the readily available local labor pool in the region. As a result, Project-related construction workers are not likely to relocate to the area as a consequence of working on the Project.

Based on 2019 estimates for the Boyle Heights Community Plan Area, the average household size is approximately 3.88 residents.[69] The Project would include 64 residential units, which could generate approximately 249 residents (64 x 3.88). It should be noted that this estimate is highly conservative given that approximately 49 percent of the Project's dwelling units would be studio and one-bedroom units. The addition of 249 residents represents approximately 0.005 percent of the estimated population in the City by 2040. The addition of 64 residential units represents approximately 0.004 percent of the estimated housing supply in the City by 2040. Additionally, the ground floor commercial uses of the Project could result in approximately 6-12 employees on-site.[70] Accounting for a conservative total of 12 employees, this would account for less than 0.001 percent of the total employment estimate for 2040.

The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the Project would not indirectly induce population growth. Because the Project is consistent with General Plan and the Boyle Heights Community Plan, it would not introduce unplanned infrastructure not previously evaluated or anticipated in those plans. Therefore, impacts would be less than significant and no mitigation measures are required.

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

No Impact. The Project Site does not currently contain any existing structures, including residential uses. Therefore, development of the Project would not require construction of replacement housing. No impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Housing and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time

[69] *Los Angeles Department of City Planning, Boyle Heights, Community Plan Area – Demographic Profile, https://planning.lacity.org/complan/CPA_DemographicProfile/2014_BOYLE_HTS.pdf, accessed: August 2019.*

[70] *Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. (Based on a generation rate 0.00271 employees per square feet of neighborhood shopping center).*

and cumulative impacts with respect to housing and population growth would be less than significant and no mitigation measures are required.

15. PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. The Project would be served primarily by Fire Station No. 2, located at 1962 E. Cesar Chavez Avenue, approximately 0.5 mile north from the Project Site.[71] Fire Station No. 2 includes an assessment light force, engine, and paramedic rescue ambulance.[72] Fire Station No. 4, located at 450 E. Temple Street, approximately 1.7 miles west from the Project Site, would also serve the Project. Fire Station No. 4 includes an assessment engine, paramedic rescue ambulance, EMS battalion captain, and BLS rescue ambulance.[73] Furthermore, based on response metrics from January to July 2019, Fire Station No. 2 had an average response time 5 minutes and 9 seconds for non-EMS calls of, and 5 minutes and 9 seconds for EMS calls. Thus, the existing fire response distance from Fire Station No. 2 to the Project Site and average response time to the Project Site would be adequate.[74] Thus, the existing fire response distance from Fire Station No. 2 to the Project Site and average response time to the Project Site would be adequate.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, every first story dwelling unit and all first story portions of any commercial building must be within 300 feet of an approved fire hydrant. The nearest fire hydrant to the

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[71] *City of Los Angeles Department of City Planning, Fire and Police Stations Map, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LAPD_LAFD.pdf, accessed: August 2019.*

[72] *City of Los Angeles Fire Department, Fire Station Directory, March 2014.*

[73] *Ibid.*

[74] *City of Los Angeles Fire Department, Fire Stat LA, website: http://www.lafd.org/fsla/stations-map, accessed August 2019.*

Project Site is located within the Metro Soto Station Plaza, which is adjacent to the Project Site.[75] Even so, additional fire hydrants may be required, depending on the building design and LAFD requirements, as determined by LAFD. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration and would not result in any significant environmental impacts.

Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., E. 1st Street and S. Soto Street). All improvements proposed would be in compliance with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation.

Therefore, for the reasons stated above, impacts related to adequate proximity to a fire station, fire flow, fire hydrants, and emergency access would be less than significant.

b) Police protection?

Less Than Significant Impact. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Hollenbeck Community Police Station, which is located at 2111 E. 1st Street, approximately 0.3 mile west from the Project Site.[76] The Hollenbeck Community Police Station is under the jurisdiction of LAPD's Central Bureau, and it's boundaries include approximately 200,000 people and covers 15.2 square miles.[77] The Project Site is located in Reporting District 454.[78]

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given Project Site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time.

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

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[75] *City of Los Angeles, Los Angeles GeoHub, Fire Hydrants (DWP), website: http://geohub.lacity.org/datasets/39e5c79ddd8a4eada40340f6ceb08fae_0, accessed: August 2019.*

[76] *City of Los Angeles Department of City Planning, Fire and Police Stations Map, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LAPD_LAFD.pdf, accessed: August 2019.*

[77] *City of Los Angeles Police Department, Central Bureau, Hollenbeck Community Police Station, About Hollenbeck, website: http://www.lapdonline.org/hollenbeck_community_police_station/content_basic_view/1649, accessed: August 2019.*

[78] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

Operation

As discussed in Section VI.14 previously, the Project could result in an on-site population of approximately 249 persons and 12 employees, thereby generating a potential increase in the number of service calls from the Project Site. As discussed in Section VI.14, *Population and Housing*, these population increase totals are conservative. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and, where possible, security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. Additionally, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project's residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Therefore, potential impacts to police protection services during the operation of the Project would be less than significant.

c) Schools?

Less Than Significant Impact. The Project is in an area that is currently served by the Los Angeles Unified School District (LAUSD) schools. The Project would improve the Project Site with a new five-story, 64.5-foot high mixed-use affordable housing building consisting 63 affordable units and one market-rate manager's unit, 2,443 square feet of ground floor commercial space, and 50 total automobile parking spaces in a one level subterranean parking garage. As such, the Project would increase the number of students in the area. As shown in Table VI-18, Student Generation, the Project would generate approximately 26 students. However, to reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for LAUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[79] The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD.

Table VI-18
Student Generation

Land Use	Size	Students per Household[a]	Total Students
Residential Units	64 du	0.4	26
Students Generated			**26**

Notes: du = dwelling units

[a] Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017

[79] *Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.*

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to address a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. Therefore, as payment of appropriate school fees to LAUSD is required by law and considered to fully address impacts, impacts would be less than significant.

d) Parks?

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. Table VI-19, Parks and Recreation Facilities Serving the Project Area, identifies the facilities serving the Project Site.[80]

Table VI-19
Parks and Recreation Facilities Serving the Project Area

Park/Recreation Facility Name	Location	Approximate Distance to the Project Site (miles)	Service Radius (miles)
Community Parks			
Pecan Recreation Center	145 S. Pecan Street	0.72	1.0
Pecan Pool	120 S. Glass Street	0.75	
Hollenbeck Recreation Area	415 S. St. Louis Street	0.36	
Ross Valencia Community Park	1st and Chicago Street	0.14	
Prospect Park	Echandia Street & Judson Street	0.83	
State Street Recreation Center	716 N. State Street	0.67	
Roosevelt Pool	456 S. Mathews Street	0.42	
Wabash Recreation Center	2765 Wabash Avenue	0.86	
Evergreen Recreation Center	2844 E. 2nd Street	0.44	
Boyle Heights Sports Center	933 S. Mott Street	0.81	
Source: City of Los Angeles Department of Recreation and Parks, Map Locater, website: http://www.laparks.org, accessed: August 2019.			

As discussed in Section VI.14 previously, the Project could result in an on-site population of approximately 249 persons. The Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage. The City's standard ratio of neighborhood and community parks to population is 4 acres per 1,000 people as set forth in the Public Recreation Plan. As of 2010 the Boyle Heights Community Plan Area serves less than 1 acre of open space per 1,000 residents.[81] The facilities in this area with active recreational features are very heavily used. While LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often

[80] *City of Los Angeles Department of Recreation and Parks, Map Locater, website: http://www.laparks.org, accessed: August 2019.*

[81] *City of Los Angeles Department of City Planning, Map 62 Park Level of Service (Acres per 1,000 Residents in 2010), website: http://planning.lacity.org/cwd/framwk/healthwellness/Maps/62.pdf, accessed: August 2019.*

only one-tenth of an acre, and have a service radius of one-half mile. None of these planned parks will be sited within a half-mile of the Project Site.[82]

Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide open space to the proposed residences. Specifically, the Project proposes 8,171 square feet of open space including: a central courtyard, community terrace, roof terrace, community room, exercise room, and private balconies. These recreational amenities would help relieve stress on the City's existing park system. Even so, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact would be reduced through the required payment of the Dwelling Unit Construction Tax to the City for the construction of apartment units. Monies collected as part of the Dwelling Unit Construction Tax is placed in a "Park and Recreational Sites and Facilities Fund" and used exclusively for the acquisition and development of park and recreational sites and facilities as set forth in LAMC Section 21.10.3(d). Additionally, the Project would be required to pay Park Fees to the LADRP per LAMC Section 19.17. Therefore, impacts would be less than significant.

e) Other public facilities?

Less Than Significant Impact. Los Angeles Public Library (LAPL) provides library services to the City. Table VI-20, Libraries Serving the Project Site, lists the libraries identified by LAPL as available to serve the Project: 119 South Soto Street, Los Angeles, CA, USA

Table VI-20
Libraries Serving the Project Area

Library Name	Location	Approximate Distance to the Project Site (miles)	Service Radius (miles)
Benjamin Franklin Branch Library	2200 E. 1st Street	0.1	3.0
Malabar Branch Library	2801 Wabash Avenue	0.9	
Little Tokyo Branch Library	203 S. Los Angeles Street	1.9	
Chinatown Branch Library	639 N. Hill Street	2.1	
Robert Louis Stevenson Branch Library	803 Spence Street	1.3	
Lincoln Height Branch Library	2530 Workman Street	2.3	
Central Library	630 W. 5th Street	2.6	

Source: Los Angeles Public Library, Locations and Hours, website: http://www.lapl.org/branches, accessed: August 2019.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with

[82] *Los Angeles Department of Recreation and Parks, 50 Parks Initiative, Status of 50 Parks Projects Map, website: http://www.laparks.org/50parks/map, accessed: August 2019.*

no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[83]

Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Therefore, impacts to library facilities would be less than significant and no mitigation measures are required.

Cumulative Impacts

Fire

Less Than Significant Impact. Development of the Project in combination with the related projects would cumulatively increase the demand for fire protection services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Moreover, all of the cumulative development would be reviewed by LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and no mitigation measures are required.

Police

Less Than Significant Impact. It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant and no mitigation measures are required.

Schools

Less Than Significant Impact. As discussed above, payment of developer impact fees in accordance with SB 50 would ensure that the impacts of the Project on school facilities would be less than significant.

[83] *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed: August 2019.*

Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully mitigate any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant and no mitigation measures are required.

Parks

Less Than Significant Impact. As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

Library

Less Than Significant Impact. As discussed above, library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Similar to the Project, the related projects in the area would be required to pay the required City fees. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

16. RECREATION

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

Less Than Significant Impact. As discussed in Section VI.15 above, the Project could result in an on-site population of approximately 249 persons. The Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage. The City's standard ratio of neighborhood and community parks to population is 4 acres per 1,000 people as set forth in the Public Recreation Plan. As of 2010 the Boyle Heights Community Plan Area serves less than 1 acre of open space per 1,000 residents.[84] The facilities in this area with active recreational features are very heavily used. While LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one-tenth of an acre, and have a service radius of one-half mile. None of these planned parks will be sited within a half-mile of the Project Site.[85]

Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide open space to the proposed residences. Specifically, the Project proposes 8,171 square feet of open space including: a central courtyard, community terrace, roof terrace, community room, exercise room, and private balconies. These recreational amenities would help relieve stress on the City's existing park system. Even so, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact

[84] *City of Los Angeles Department of City Planning, Map 62 Park Level of Service (Acres per 1,000 Residents in 2010), website: http://planning.lacity.org/cwd/framwk/healthwellness/Maps/62.pdf, accessed: August 2019.*

[85] *Los Angeles Department of Recreation and Parks, 50 Parks Initiative, Status of 50 Parks Projects Map, website: http://www.laparks.org/50parks/map, accessed: August 2019.*

would be reduced through the required payment of the Dwelling Unit Construction Tax to the City for the construction of apartment units. Monies collected as part of the Dwelling Unit Construction Tax is placed in a "Park and Recreational Sites and Facilities Fund" and used exclusively for the acquisition and development of park and recreational sites and facilities as set forth in LAMC Section 21.10.3(d). Additionally, the Project would be required to pay Park Fees to the LADRP per LAMC Section 19.17. 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. The Project would provide 8,171 square feet of open space including: a central courtyard, community terrace, roof terrace, community room, exercise room, and private balconies. These recreational amenities would be internal to the Project and would help relieve stress on the City's existing park and recreational system. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

17. TRANSPORTATION

The following analysis utilizes information provided in the *Transportation Impact Study, Los Lirios Mixed-Use Project*, prepared by Linscott, Law & Greenspan, Engineers, July 18, 2018 (Transportation Study) which is provided in Appendix D. An Addendum to the Transportation Study is also provided in Appendix D. The Transportation Study was reviewed and approved by the Los Angeles Department of Transportation (LADOT) as discussed in the LADOT approval letter dated October 2, 2018.

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

Less Than Significant.

Project Traffic Impacts

Traffic volumes expected to be generated by the Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using rates as published in the ITE *Trip Generation Manual* or provided by LADOT. As published in the *City of Los Angeles Transportation Impact Study Guidelines*, affordable housing trip rates for family and senior units derived from the independent study conducted in 2016 of affordable housing sites in the City of Los Angeles were used to forecast the weekday AM and PM peak hour traffic volumes expected to be generated by the affordable housing residential component. Traffic volumes expected to be generated by the commercial land use components of the Project were based upon rates per 1,000 gross square feet.

In addition to the trip generation forecast for the Project, a forecast was made of the likely pass-by trips that could be anticipated at the site. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the generator. Pass-by trip adjustments of 50 percent and 20 percent were applied to the traffic volume forecast for the retail and restaurant components, respectively, pursuant to the LADOT policy.

A trip reduction adjustment was also employed in the project trip generation forecast to account for the proximity to the existing adjacent Metro Soto Station, as well as the high level of bus transit opportunities and pedestrian activity in the Project study area. Based on LADOT traffic study guidelines and discussions with LADOT staff, a transit trip reduction factor of 15 percent (15%) would be applicable to the Project based on the Project's proximity to the Metro Soto Station and public bus transit routes in the area. However, no other adjustments were made to the Project trip generation forecasts to account for trips made internal to the project site (i.e., internal capture).

As presented in Table VI-21, Project Trip Generation, the Project is expected to generate 48 vehicle trips (22 inbound trips and 26 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project is expected to generate 41 vehicle trips (23 inbound trips and 18 outbound trips). Over a 24-hour period, the Project is forecast to generate 496 daily trip ends during a typical weekday (248 inbound trips and 248 outbound trips).

Table VI-21
Project Trip Generation

Land Use	Size	Daily Trip Ends Volumes	AM Peak Hour Volumes			PM Peak Hour Volumes		
			In	Out	Total	In	Out	Total
Apartments	66 du	270	13	20	33	12	10	22
Less Transit Adjustment (15%)		(41)	(2)	(3)	(5)	(2)	(2)	(4)
Community Room	1,490 sf	43	2	1	3	1	2	3
Less Transit Adjustment (15%)		(6)	--	--	--	--	--	--
Retail	2,500 sf	94	1	1	2	5	5	10
Less Pass-by Adjustment (50%)		(47)	(1)	(1)	(2)	(3)	(3)	(6)
Less Transit Adjustment (15%)		(7)	--	--	--	--	--	--
High-Turnover Restaurant	2,500 sf	280	14	11	25	15	9	24
Less Pass-by Adjustment (50%)		(56)	(3)	(2)	(5)	(3)	(2)	(5)
Less Transit Adjustment (15%)		(34)	(2)	(1)	(3)	(2)	(1)	(3)
	Subtotal	*496*	*22*	*26*	*48*	*23*	*18*	*41*

Source: Linscott Law & Greenspan, Transportation Impact Study, Los Lirios Mixed-Use Project (Appendix D).

Immediate access to the Project and associated parking facility will be provided via the proposed driveway located on the east side of the alleyway along the westerly property frontage which can be accessed from E. 1st Street. The following five study intersections were selected for analysis in consultation with LADOT staff in order to determine potential impacts related to the Project:

1. Breed Street/E. 1st Street
2. S. Soto Street/Cesar E. Chavez Avenue

3. S. Soto Street/ E. 1st Street
4. S. Soto Street/4th Street
5. Mott Street/ E. 1st Street

The study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis which determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition).

The significance of the potential impacts of project generated traffic was identified using the traffic impact criteria set forth in LADOT's *Transportation Impact Study Guidelines*, December 2016. According to the City's published traffic study guidelines, the impact is considered significant if the project-related increase in the *v/c* ratio equals or exceeds the thresholds presented in Table VI-22, City of Los Angeles Intersection Impact Threshold Criteria.

Table VI-22
City of Los Angeles Intersection Impact Threshold Criteria

LOS	Final v/c	Project Related Increase in v/c
C	>0.700-0.800	equal to or greater than 0.040
D	>0.800-0.900	equal to or greater than 0.020
E or F	>0.900	equal to or greater than 0.010

Traffic impacts at the study intersections were analyzed for the following conditions:

(a) Existing conditions.

(b) Existing with project conditions.

(c) Condition (a) plus one percent (1.0%) annual ambient traffic growth through year 2021 and with completion and occupancy of the related projects (i.e., future without project conditions).

(d) Condition (c) with completion and occupancy of the proposed project.

(e) Condition (d) with implementation of project mitigation measures, where necessary.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the study intersections. It should be noted that Condition (b) above is a hypothetical scenario in that it calculates the traffic due to the occupancy of the Project in addition to the existing traffic volumes, but changes to existing volumes are expected to occur throughout the Project's construction period due to other area projects and regional growth. However, this condition has been prepared to be consistent with the general rule under CEQA that the potential impacts of a development project are to be measured against existing conditions. Condition (d) above analyzes future conditions upon completion and full occupancy of the Project, which is expected to occur in 2021.

As indicated in Table VI-23, all of the five study intersections are presently operating at LOS C or better during the weekday AM and PM peak hours. The "Existing With Project" scenario indicates that the Project is not expected to create significant impacts at any of the five study intersections. Incremental, but not significant, impacts are noted at the study intersections. Similarly, the "With Proposed Project" scenario indicates that the Project is not expected to create significant impacts at the five study intersections.

Table VI-23
City of Los Angeles Levels of Service Summary and Volume to Capacity Ratios

No.	Intersection	Peak Hour	Existing		Existing With Project			Sig. Impact?	Future W/O Project		Future With Project			Sig. Impact?
			V/C	LOS	V/C	LOS	Change		V/C	LOS	V/C	LOS	Change	
1	Breed Street/E. 1st Street	AM	0.573	A	0.581	A	0.008	NO	0.695	B	0.703	C	0.008	NO
		PM	0.454	A	0.464	A	0.010	NO	0.631	B	0.641	B	0.010	NO
2	S. Soto Street/Cesar E. Chavez Avenue	AM	0.617	B	0.620	B	0.003	NO	0.749	C	0.752	C	0.003	NO
		AM	0.567	A	0.568	A	0.001	NO	0.688	B	0.690	B	0.002	NO
3	S. Soto Street/ E. 1st Street	AM	0.724	C	0.737	C	0.013	NO	0.847	D	0.860	D	0.013	NO
		PM	0.687	B	0.701	C	0.014	NO	0.912	E	0.917	E	0.005	NO
4	S. Soto Street/4th Street	AM	0.621	B	0.623	B	0.002	NO	0.838	D	0.841	D	0.003	NO
		PM	0.616	B	0.616	B	0.000	NO	0.850	D	0.850	D	0.000	NO
5	Mott Street/ E. 1st Street	AM	0.619	B	0.625	B	0.006	NO	0.719	C	0.726	C	0.007	NO
		PM	0.529	A	0.532	A	0.003	NO	0.645	B	0.649	B	0.004	NO

Source: Linscott Law & Greenspan, Transportation Impact Study, Los Lirios Mixed-Use Project (Appendix D).

Incremental, but not significant, impacts are noted at the study intersections. No traffic mitigation measures are required or recommended for the study intersections.

Related Projects

A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. The related projects research was based on information on file at the City of Los Angeles Departments of Transportation and Planning. The related projects' respective traffic generation for the weekday AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized in Table VI-24, Related Projects Trip Generation.

Table VI-24
Related Projects Trip Generation[1]

ID	Location	Daily Trip Ends Volumes[2]	AM Peak Hour Volumes[2]			PM Peak Hour Volumes[2]		
			In	Out	Total	In	Out	Total
1	1510 N. San Pablo Street	7,715	613	140	753	161	613	774
2	2901 E. Olympic Boulevard	19,382	463	1,044	1,507	1,123	8.04	1,927
3	950 East 3rd Street	6,372	162	177	339	245	213	458
4	3401 E. 1st Street	458	6	18	24	25	17	42
5	963 E. 4th Street	2,512	106	22	128	113	138	251
6	2051 E. 7th Street	2,310	17	127	144	145	64	209
7	826 S. Mateo Street	1,267	11	34	45	62	39	101
8	555 S. Mateo Street	4,300	5	30	35	220	205	425
9	2030 E. 7th Street	2,306	274	34	308	69	249	318
10	540 S. Santa Fe Avenue	726	90	12	102	17	81	98
11	1030 N. Soto Street	662	25	18	43	25	23	48
12	2407 E. 1st Street	450	2	18	20	22	14	36
13	410 N. Center Street	1,165	87	0	87	0	79	79
14	500 S. Mateo Street	1,052	48	41	89	50	31	81
15	2130 E. Violet Street	1,351	137	30	167	39	122	161
16	929 E. 2nd Street	2,153	68	12	80	105	96	201
17	2420 E. Cesar Chavez Avenue	1,087	25	26	61	54	44	98
18	520 S. Mateo Street	4,995	157	220	377	274	223	497
19	2650 E. Olympic Boulevard	12,247	498	447	945	599	539	1,138
20	527 S. Colyton Street	2,095	36	116	152	121	74	195
21	940 E. 4th Street	788	14	37	51	44	31	75
22	806 E. 3rd Street	253	1	(1)	0	13	7	20
23	640 S. Santa Fe Avenue	1,330	90	8	98	43	114	157
24	443 S. Soto Street	277	131	112	243	32	25	57
25	2143 E. Violet Street	4,477	329	122	451	130	330	460
26	676 S. Mateo Street	1,990	50	95	145	106	51	157
27	1000 S. Santa Fe Avenue	2,029	194	30	224	57	192	249

ID	Location	Daily Trip Ends Volumes[2]	AM Peak Hour Volumes[2]			PM Peak Hour Volumes[2]		
			In	Out	Total	In	Out	Total
28	220 N. Center Street	2,166	33	119	152	121	79	200
29	810 E. 3rd Street	1,487	37	32	69	87	48	135
30	2110 Bay Street	2,394	180	63	243	89	192	281
31	401 S. Hewitt Street	3,493	365	76	441	100	324	424
Total		95,289	4,254	3,269	7,523	4,291	5,061	9,352

[1] Sources: City of Los Angeles Department of Transportation (LADOT) and Department of City Planning (LADCP). The peak hour traffic volumes were forecast based on trip data provided by LADOT and by applying trip rates as provided in the ITE "Trip Generation Manual", 9th Edition, 2012.

[2] Trips are one-way traffic movements, entering or leaving.

Source: Linscott Law & Greenspan, Transportation Impact Study, Los Lirios Mixed-Use Project (Appendix D).

Ambient Traffic Growth Factor

Horizon year background traffic growth estimates have been calculated using an ambient traffic growth factor. The ambient traffic growth factor is intended to include unknown related projects in the study area as well as account for typical growth in traffic volumes due to the development of projects outside the study area. Ambient traffic growth in the Los Angeles area is presented in the *2010 Congestion Management Program for Los Angeles County* (CMP manual) and determined in consultation with LADOT staff. It is noted that based on review of the general traffic growth factors provided in the CMP manual for the Central/Southeast area (RSA 23 – Downtown Los Angeles, Exposition Park, MacArthur Park), it is anticipated that the existing traffic volumes are expected to increase at an annual rate of less than 1.0% per year between the years 2010 and 2020. An annual growth rate of one percent (1.0%) to the buildout year 2021 was used for analysis purposes. Thus, application of this annual growth factor allows for a conservative, worst case forecast of future traffic volumes in the area. Further, it is noted that the CMP manual's traffic growth rate is intended to anticipate future traffic generated by development projects in the project vicinity. Thus, the inclusion in the Transportation Study of both a forecast of traffic generated by known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data results in a conservative estimate of future traffic volumes at the study intersections.

Summary of Operation-Related Traffic Impacts

It is concluded that the Project is not expected to create a significant traffic impact at any of the five study intersections based on the City of Los Angeles thresholds of significance used for evaluating traffic impacts. Incremental, but not significant, impacts are noted at the study intersections with completion of the Project. Because there are no significant impacts, no direct traffic mitigation measures are required or recommended for the study locations.

Construction Traffic Impacts

Construction activities would include demolition, grading, excavation, and building construction. The Project would be ready for occupancy in 2021.

Construction workers would be on-site before 7:00 A.M. and would typically leave the Project Site prior to 5:00 P.M. These workers typically arrive and depart outside of the commuter peak hours, thereby minimizing the effect of construction worker traffic. During construction, there would be far fewer daily and peak hour trips than the Project trip generation estimates. As discussed above, traffic impacts during

operation would be less than significant. Therefore, the construction process would not result in significant traffic impacts to study intersections.

The Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. Moreover, LADOT recommends the Project implement a Work Site Traffic Control Plan which would be developed for use during the entire construction period. The plan would include a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction. This plan would also incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area. The Work Site Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. Construction equipment and worker cars would generally be contained on-site. At times when on-site staging and parking is not available, a secondary staging area would be required. Thus, adherence to the Work Site Traffic Control Plan would ensure construction-related impact would not result in a significant impact to the performance of the circulation system (see RCM TRAF-1). Therefore, impacts would be less than significant and no mitigation measures are required.

Regulatory Compliance Measure

RCM TRAF-1 The Applicant shall prepare a detailed Work Site Traffic Control Plan that shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including estimated duration of construction and daily hours of construction;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men);
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets;
- Containment of construction activity within the Project Site boundaries;
- Safety precautions for pedestrians through such measures as alternate routing and protection barriers shall be implemented;
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours;
- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including

utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times;

- Temporary pedestrian facilities should be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility;
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects;
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Transit Impact Review

The Project would be incorporated into the Metro Soto Station Plaza which provides service for the Metro Gold Line. Moreover, the Project is served by Metro bus lines 30/330, 68, 106, 251, 252, 605, 751, and 770, and Montebello bus line 40. A summary of these existing transit services, including the transit route, destinations and peak hour headways is presented in Table VI-25, Existing Transit Routes.

As required by the *2010 Congestion Management Program for Los Angeles County*, a review has been made of the potential impacts of the project on transit services. The Project trip generation, was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to LADOT approval, assuming 15 percent (15%) transit trips, the proposed project is forecast to generate demand for ten transit trips during the weekday AM peak hour and nine transit trips during the PM peak hour. Over a 24-hour period, the proposed project is forecast to generate demand for 104 daily transit trips. The calculations are as follows:

- AM Peak Hour = $48 \times 1.4 \times 0.015 = 10$ Transit Trips
- PM Peak Hour = $41 \times 1.4 \times 0.015 = 9$ Transit Trip
- Daily Trips = $496 \times 1.4 \times 0.035 = 104$ Transit Trips

As shown in Table VI-25, 10 bus and rail transit lines and routes are provided adjacent to or in close proximity the Project Site. These 10 transit lines provide services for an average of (i.e., average of the directional number of buses during the peak hours) generally 81 buses/trains during the AM peak hour and roughly 86 buses/trains during the PM peak hour. Therefore, based on the calculated weekday AM and PM peak hour trips, this would correspond to less than one additional transit rider per bus/train. It is anticipated that the existing transit service in the Project area will adequately accommodate the increase of project-generated transit trips. Thus, given the number of project-generated transit trips per bus/train, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the Project.

Table VI-25
Existing Transit Route

Route	Destinations	Roadway(s) Near Site	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 30/330	West Hollywood to East Los Angeles via Beverly Hills, Los Angeles and Downtown Los Angeles	S. Soto Street, Mott Street, E. 1st Street	EB	3	2
			WB	2	3
Metro 68	Los Angeles to Montebello via East Los Angeles and Monterey Park	S. Soto Street, Cesar E Chavez Avenue	EB	4	4
			WB	4	4
Metro 106	East Los Angeles to Boyle Heights	S. Soto Street, 4th Street	EB	1	2
			WB	1	2
Metro 251	Cypress Park to Lynwood via Lincoln Heights, Boyle Heights, Huntington Park and South Gate	S. Soto Street, Cesar E Chavez Avenue, E. 1st Street, 4th Street	NB	4	5
			SB	3	5
Metro 252	Boyle Heights to Montecito Heights via Lincoln Heights and El Sereno	S. Soto Street, Cesar E Chavez Avenue, E. 1st Street, 4th Street	NB	3	3
			SB	3	3
Metro 605	Boyle Heights	S. Soto Street, Cesar E Chavez Avenue, E. 1st Street, 4th Street	NB	4	4
			SB	4	4
Metro 751	Huntington Park to Cypress Park via Boyle Heights and Lincoln Heights	S. Soto Street, Cesar E Chavez Avenue, E. 1st Street, 4th Street	NB	4	4
			SB	5	4
Metro 770	El Monte to Downtown Los Angeles via South El Monte, Monterey Park and East Los Angeles	S. Soto Street, Cesar E Chavez Avenue	EB	4	6
			WB	5	5
Metro Gold Line	East Los Angeles to Azusa via Los Angeles, Highland Park, South Pasadena, Pasadena, Arcadia, Monrovia, Duarte and Irwindale	S. Soto Street, E. 1st Street	EB	8	8
			WB	8	8
Montebello Line 40	Whittier to Downtown Los Angeles via Montebello, East Los Angeles and Boyle Heights	S. Soto Street, 4th Street	EB	6	5
			WB	5	5
			Total	**81**	**86**

Sources: Los Angeles County Metropolitan Transportation Authority (Metro) and City of Montebello Bus Lines websites, 2018.

Bicycle Facilities

Bicycle access to the Project Site is facilitated by the City of Los Angeles bicycle roadway network. Existing or proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, Proposed Bicycle Routes, Bicycle Friendly Streets, etc.) in the City's 2010 Bicycle Plan are located within an approximate one-mile radius from the Project Site. It is important to note that the 2010 Bicycle Plan goals and policies have been folded into the Mobility 2035 Plan to reflect a commitment to a balanced, multi-modal viewpoint. The Project Site is situated in a fairly flat area near downtown Los Angeles. Bicycling as a transportation mode can be accommodated especially when used in combination with transit opportunities in the Project Site area.

LAMC Section 12.21.A.16(A)(2) requires new projects to provide bicycle parking spaces. As shown in Table VI-26, the Project would require 60 bicycle parking spaces including 53 long term spaces and 7 short term spaces. The Project would include 66 bicycle parking spaces including 54 long term spaces and 12 short term spaces. Thus, the Project meets the LAMC requirements and would not conflict with implementation of bicycle facilities and infrastructure as set forth in the 2010 Bicycle Master Plan. Impacts would be less than significant and no mitigation measures are required.

Table VI-26
Bicycle Parking Summary

Type of Parking	Parking Requirement	Units	Spaces Required
Residential			
Long-Term	1 space/unit	1-25	25
	1 space/1.5 units	26-64	26
Short-Term	1 space/ 10 units	1-25	2.5
	1 space/15 units	26-64	2.6
Commercial			
Long-Term	1 space/2,000 sf	2,443	2
Short-Term	1 space/2,000 sf	2,443	2
Bicycle Parking Required	*53 Long Term + 7 Short Term*		
Bicycle Parking Provided	**54 Long Term + 12 Short Term**		
sf = square feet			
Source: Gonzalez Goodale Architects, 2019.			

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

Less Than Significant Impact. The Congestion Management Program (CMP) was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents. The VMT analysis is provided below.

VMT

Section 15064.3 was recently added to the State CEQA Guidelines, which describes specific considerations for evaluating a project's transportation impacts. Section 15064.3(b) establishes VMT as the most appropriate measure of transportation impacts, shifting away from the use of LOS analysis that evaluates

a project's impacts on traffic conditions at nearby roadways and intersections. Section 15064.3(c) states that, while a lead agency may elect to be governed by the provisions of Section 15064.3 immediately, it is not required to do so until July 1, 2020.

The Project is infill development that would provide residential and commercial/retail uses within an existing urban area. Infill development generally reduces VMT compared to greenfield development.[86] As a mixed-use development in the downtown area, the project would not create a substantial increase in VMT. This conclusion is supported by the following summary of the per capita VMT analysis. The full VMT analysis is provided in Appendix J.

According to the City's Transportation Assessment Guidelines, a development project's daily vehicle trips should be estimated using the City's VMT Calculator. The proposed Project, which includes both residential (multi-family units and affordable housing [family-type] units) and commercial (office and retail) uses, would have a potential impact if it meets the following:

- "For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located."
- "For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the project is located."

The project's estimated household VMT per capita and work VMT per employee are compared to the average household VMT per capita and work VMT per employee for the corresponding APC. Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. See Table A of Appendix J. The Project is in the East Los Angeles APC, so the VMT impact criteria (i.e., 15% below APC average) applicable to the proposed project is 7.2 daily household VMT per capita and 12.7 daily work VMT per employee.

Based on the City's VMT Calculator, the estimated household VMT per capita for the project is 5.4 household VMT per capita and the work VMT per employee is not applicable based on the City's TAG and VMT Calculator (see Appendix J). It is noted that other than accounting for the proposed Project providing on-site bicycle parking pursuant to City Code requirements, no transportation demand management measures, trip reduction strategies, or project design features have been included in the estimation of the Project's VMT. Therefore, based on the City's threshold criteria for the East Los Angeles APC (see Appendix J), the proposed Project is not forecast to result in a significant household VMT per capita or work VMT per employee impact.

c) Would the project 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. The Project as designed does not include development of any new roadways or intersections. The Project driveway would be located on the east side of the existing alleyway along the

[86] *Perkins Coie. 2019. California Land Use and Development Law Report – Legal Commentary on planning and Development. "New Guidelines for Assessing Transportation Impacts Under CEQA Finalized. Accessible at: https://www.californialandusedevelopmentlaw.com/2019/01/07/new-regulations-for-assessing-transportation-impacts-under-ceqa-finalized/. Accessed October 2019.*

westerly property frontage, at the southwest corner of the Project Site. The project driveway would accommodate left-turn and right-turn vehicular ingress and egress turning movements. The Project Site driveway would be located to provide direct access to and from the subterranean parking level. The project site driveway would be required to be constructed to City of Los Angeles design standards. The Soto Station's Plaza would be designed to incorporate new landscaping and hardscaping to ensure pedestrian mobility is maintained. Pedestrian access to the residential units would be from the ground floor residential lobby accessible from the Metro Soto Station Plaza. Additionally, the ground floor commercial uses would be accessible from the Metro Soto Station Plaza and S. Soto Street frontage. Access to residential and commercial uses would be available via elevators and stairways in the parking levels.

The Project would include 66 bicycle parking spaces including 54 long term spaces and 12 short term spaces. The bicycle spaces would be provided in the subterranean garage and Metro Soto Station Plaza. Outdoor bicycle spaces would encourage use and maintain visibility for personal safety and theft protection. Appropriate lighting will be provided to increase safety and provide theft protection during night-time parking.

Based on the discussion above, the Project would not substantially increase hazards for vehicles, pedestrians, and bicyclists accessing the Project Site due to a geometric design feature. Impacts related to hazards would be less than significant and no mitigation measures are required.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. For the purpose of this issue, a significant impact may occur if a project design does not provide emergency access meeting the requirements of LAFD or LAPD, or threatened the ability of emergency vehicles to access and serve the project site or adjacent uses.

As previously discussed, there are no critical facilities, lifeline systems, or disaster routes in the immediate vicinity of the Project Site.[87,88] However, E. 1st Street and S. Soto Street are classified as Secondary Disaster Routes by Los Angeles County.[89] Nonetheless, as discussed in above, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Impacts related to inadequate emergency access would be less than significant and no mitigation is required.

Cumulative Impacts

Less Than Significant Impact. With respect to construction traffic, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to submit formal construction staging and traffic control

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[87] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

[88] *Ibid.*

[89] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles West Area, website: http://dpw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf, accessed: August 2019.*

plans for review and approval by the City prior to the issuance of construction permits. The Work Site Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that the related projects would comply with a similar plan, and as such, the cumulative construction traffic impact would be less than significant and no mitigation measures are required.

Existing traffic, related projects' traffic, Project traffic, and a one percent per year ambient growth factor were added together to estimate future cumulative traffic volumes. As shown above, the future traffic volumes of the related projects and ambient growth with and without the Project would not result in significant impacts. Therefore, the cumulative traffic operational impact would be less than significant and no mitigation measures are required.

18. TRIBAL CULTURAL RESOURCES

a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact.

Tribal Cultural Resources (TCR) includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. Public Resources Code Section 21084.2 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." A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource 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), or if such resource is 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. PRC 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

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.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Although the Project Site is located in a highly urbanized area of the Boyle Heights Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and export of approximately 12,908 cubic yards of soil. Thus, the potential exists for the unanticipated discovery of archaeological materials. Because the

presence or absence of such materials cannot be determined until the site is excavated, as discussed in Section VI.5, Cultural Resources, a Records Search was conducted by the California Historical Resources Information System - South Central Coastal Information Center on June 26, 2019. The CHRIS Historic Records Search is available as Appendix B. The search concluded there are no previously identified historical resources on the site, however, it was recommended that the Native American Heritage Commission (NAHC) be consulted to identify if any additional traditional cultural properties or other sacred sites are known to be in the area. As such, a record search of the NAHC Sacred Lands File was completed for the area of potential project affect (APE) on June 28, 2019 (Appendix I).

Several lines of evidence, including the Sacred Lands File search, indicate that the potential exists for unrecorded tribal cultural resources in the form of buried features or artifacts, as well as Native American burials in the Project area. The potential for impacts to tribal cultural resources exists only in those places where the Project activities are likely to encounter alluvial sediments. As discussed in the Geotechnical Investigation, artificial fill was encountered at a maximum depth of 4.5 feet below the existing ground surface, and alluvial fan deposits were encountered beneath the artificial fill. The Project would likely result in deeper excavations than previously performed on the site, including excavation to depths up to 11 feet below grade to construct the subterranean parking structure. Therefore, excavations would penetrate through the existing artificial fill and expose competent alluvial soils throughout the excavation bottom. Where proposed ground disturbances are proposed exclusively within artificial fill, any tribal cultural resources that might be present in the underlying alluvium would remain preserved, and Project-related impacts would be avoided. Because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measures MM TCR-1 through TCR-4 are required.

The Project would also be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required mitigation and regulatory compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. As discussed in Section IV., RTP/SCS Program EIR Mitigation Measures, the Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measure MM RTP/SCS-CUL-2(b). Compliance with regulatory requirements and with the Project-specific mitigation measure fulfils the RTP/SCS mitigation measure and goes beyond the scope of MM RTP/SCS-CUL-2(b).

Mitigation Measure

MM TCR-1 Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. 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. Any qualified tribal monitor(s) and archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the Project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the Project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal

monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; (2) and OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator

agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

The Project would also be required to follow procedures detailed in California Public Resources Code Section 21083.2. Adherence to the required mitigation and regulatory compliance measures would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Therefore, impacts would be less than significant after mitigation.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) to 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 Impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As previously discussed under Question 5.b), the Project Site Project Site and immediately surrounding area do not contain any known archaeological sites or archaeological survey areas. [90] However, a Sacred Lands File search conducted by in June 2019 the NAHC on behalf of the Project yielded positive results; and the Project includes subgrade preparation that would involve the excavation and export of approximately 12,908 cubic yards of soil. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, and because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measure MM TCR-1 is required.

Additionally, in the event of unforeseen and inadvertent discovery of TCRs, the Project would be required to comply with PRC Section 21074. In the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project Site until the potential TCRs are properly assessed following specific protocol required by the Department of City Planning. Implementation of mitigation measure MM TCR-1 and compliance with PRC Section 21074 would mitigate any potentially significant impact, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is diminished. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through implementation of MM TCR-1 and compliance with existing laws and the City's conditions of approval, Project impacts associated with tribal cultural resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the

[90] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

sites of the related projects. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources.

19. UTILITIES AND SERVICE SYSTEMS

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

Less Than Significant Impact.

Water

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,300 miles of pipelines and 119 storage tanks and reservoirs within the City.[91] Much of the water flows north to south, entering the City at the Los Angeles Aqueduct Filtration Plant (LAAFP), which is owned and operated by LADWP, in the community of Sylmar. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[92]

The Project's estimated water consumption is presented on Table VI-27, Estimated Average Daily Water Consumption. As shown, the Project would consume a total of approximately 9,774 gallons per day (gpd) (0.01 mgd), or approximately 10.95 acre-feet of water per year (AF/Y). Thus, implementation of the Project is not expected to measurably reduce LAAFP's capacity, and as such, no new or expanded water treatment facilities would be required. According to LADWP, the Project Site can be supplied with water from the municipal system subject to the Water System's rules of the LADWP.[93]

Table VI-27
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate[a]	Total Water Consumed (gpd)	Total Water Consumed (AF/Y)
Studio apartments	13 du	90 gpd/du	1,170	1.31
One-bedroom apartments	18 du	132 gpd/du	2,376	2.66
Two-bedroom apartments	17 du	180 gpd/du	3,060	3.43
Three-bedroom apartments	16 du	190 gpd/du	3,040	3.41

[91] *Los Angeles Department of Water and Power, About Us, Water, Facts & Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=u39sz92qb_21&_afrLoop=273163065504125, accessed: August 2019.*

[92] *Better Buildings, U.S. Department of Energy, Showcase Project: Los Angeles Aqueduct Filtration Plant Modernization-Oxygen Plant Replacement, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization-%E2%80%93-oxygen-plant-replacement, accessed: August 2019.*

[93] *Letter correspondence from Liz Gonzalez, Manager – Business Arrangements, Water Distribution Engineering, City of Los Angeles Department of Water and Power, July 10, 2019. (Appendix H)*

Table VI-27
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate[a]	Total Water Consumed (gpd)	Total Water Consumed (AF/Y)
Retail	4,265 sf	30 gpd/1,000 sf	128	0.14
		Project Total:	**9,774**	**10.95**

Notes: sf = square feet; du = dwelling units; cf = cubic feet; gpd = gallons per day; AF/Y = acre-feet per year. Some numbers have been rounded.

[a] Based on 120% of rates provided in LADWP's Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, April 6, 2012.

In addition to supplying water for domestic uses, LADWP also supplies water for fire protection services, in accordance with the Fire Code. City of Los Angeles Fire Department (LAFD) requires a water flow of 6,000 to 9,000 gallons per minute (gpm). The existing water lines that currently serve the Project Site would serve the Project. If water main or infrastructure upgrades are required, the LAMC requires the Project Applicant to pay for such upgrades, which would be constructed by either the Project Applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place, as is standard practice. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity.

Furthermore, the Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Chapter XII of LAMC comprises the City's Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the State level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. Impacts would be less than significant and no mitigation measures are required.

Wastewater

The City's Bureau of Sanitation provides sewer service to the Project area. The Project Site has existing sewer connections to the City's sewer system due to previous development. Sewage from the Project Site is conveyed via existing sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 275 mgd on a dry weather day,

and has capacity to treat 450 mgd. [94] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HTP.

Estimated Project wastewater generation is presented below in Table VI-28, Estimated Average Daily Wastewater Generation. As shown, the Project would generate approximately 8,652 gpd (0.009 mgd) or approximately 9.69 AF/Y of wastewater. Therefore, the HTP would have adequate capacity to serve the Project.

Table VI-28
Estimated Average Daily Wastewater Generation

Land Use	Size	Consumption Rate[a]	Total Water Consumed (gpd)	Total Water Consumed (AF/Y)
Studio apartments	13 du	75 gpd/du	975	1.09
One-bedroom apartments	18 du	110 gpd/du	1980	2.22
Two-bedroom apartments	17 du	150 gpd/du	2550	2.86
Three-bedroom apartments	16 du	190 gpd/du	3040	3.41
Retail	4,265 sf	25 gpd/1,000 sf	107	0.12
		Project Total:	**8,652**	**9.69**

Notes: sf = square feet; du = dwelling units; cf = cubic feet; gpd = gallons per day; AF/Y = acre-feet per year. Some numbers have been rounded.

[a] Based on rates provided in LADWP's Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, April 6, 2012.

The existing wastewater system appears able to accommodate the total flow for the Project; however, further detailed gauging would be needed as part of the permit process to identify a specific sewer connection point.[95] If deficiencies are identified during the building permit process, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action and would not result in any adverse environmental impacts. Impacts would be less than significant and no mitigation measures are required.

Electricity

As discussed previously in Section VI.6, electric service is available and will be provided to the Project Site in accordance with LADWP regulations and the Project is part of the total growth load forecast for the City and has been taken into account in the planned growth of the power system.[96] Impacts would be less than significant and no mitigation measures are required.

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[94] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed: August 2019.*

[95] *Letter correspondence from Karan Patel, CE Associate, Central District, Bureau Engineering, July 9, 2019. (Appendix H)*

[96] *Letter correspondence from Jeffrey T. Bergman, District Engineer, Metro East Service Planning, July 2, 2019. (Appendix H)*

Natural Gas

As discussed previously in Section VI.6, SCG will provide gas service to the Project in accordance with the rules and regulations in effect at the time service is provided.[97] SCG is satisfactorily meeting its obligations to its current customers and projects to meet obligations of its future customers. As such, SCG's existing infrastructure and storage supplies are well-prepared for the long-term forecasts, including the Project. Impacts would be less than significant and no mitigation measures are required.

Telecommunications

The Project Site is within the Base Rate Area of the AT&T California serving area in the Los Angeles 6 Exchange. AT&T expects to be in a position to provide telephone service to the Project upon request in accordance with requirements of, and at the rates and charges specified in, its Tariffs that are on file with the California Public Utilities Commission.[98] The Project Site is also within the service area of Charter Communications which may serve the Project Site after conducting a survey of the property.[99] There are no existing cellular towers located adjacent to the Project Site and no cellular towers are proposed by the Project. The Project would not result in the relocation of expansion of telecommunication facilities. Impacts would be less than significant and no mitigation measures are required.

b) Would the project 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. 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. MWD uses a land use based planning tool that allocates projected demographic data from SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2016–2040 RTP/SCS. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. LADWP's 2015 Urban Water Management Plan (UWMP) projects a supply of 644,700 AF/Y in 2025 and of 675,700 AF/Y in 2040.[100] With LADWP's current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.[101] As shown in Table VI-27, above, the Project would consume approximately 9,774 gpd (10.95 AF/Y) of water. This amount represents approximately 0.002 percent of the projected 2040 supply.

LADWP's Water System 10-Year Capital Improvement Program for the Fiscal Years 2010-2019 details LADWP's 10-year process of capital upgrades to the water infrastructure system of the City. Through this

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[97] *Letter correspondence from Oscar Mariscal, Pipeline Planning Assistant, SoCalGas-Compton HQ, July 16, 2019. (Appendix H)*

[98] *Letter correspondence from Troy Stanard, AT&T Engineering, July 2, 2019. (Appendix H)*

[99] *Letter correspondence from Dianna Netherlain, SoCal Central Specialist, Business Development, July 3, 2019. (Appendix H)*

[100] *City of Los Angeles Department of Water and Power, Urban Water Management Plan 2015, adopted June 7, 2016, website: file:///C:/Users/PES/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP%20(2).pdf, accessed: August 2019.*

[101] *Ibid.*

program, LADWP can provide reliable sources of water to the residents of the City.[102] Thus, sufficient water supplies are anticipated to be available to serve the Project from existing entitlements and resources, and new or expanded entitlements would not be necessary. Moreover, the Project's land uses, density, and intensity are consistent with projected Citywide growth. Thus, the Project's estimated water usage is within overall General Plan projections and would not exceed the amount anticipated by the City's long-range land use and planning efforts. As there would be sufficient water supplies available to serve the Project, impacts regarding supply would be less than significant, and no mitigation measures are required.

c) Would the project 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. As discussed above, sewage from the Project Site is conveyed via existing sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 275 mgd on a dry weather day, and has capacity to treat 450 mgd. [103] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HTP.

Estimated Project wastewater generation is presented below in Table VI-28, Estimated Average Daily Wastewater Generation. As shown, the Project would generate approximately 8,652 gpd (0.009 mgd) or approximately 9.69 AF/Y of wastewater. Therefore, the HTP would have adequate capacity to serve the Project. The Project would have a less than significant impact with respect on wastewater treatment capacity and no mitigation measures are required.

d) Would the project 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) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The following discussion incorporates responses to both thresholds, 19d and 19e. Solid waste generated within the City is disposed of at privately-owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. It is reasonably anticipated, then, that the Project Applicant would contract with a local commercial solid waste hauler following completion of the Project. As is typical for most solid waste haulers in the greater Los Angeles Area, the hauler would most likely separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of

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[102] *City of Los Angeles Department of Water and Power, Water System Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019, website: file:///C:/Users/PES/Downloads/WSO%20Capital%20Book.pdf, accessed: August 2019.*

[103] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed: August 2019.*

landfills, depending on with whom the hauler has contracts. Most commonly, the City is served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including construction and demolition (C&D) waste. As of 2017 the Sunshine Canyon Landfill permits a daily intake of 12,100 tons, and has a remaining capacity of 68.0 million tons.[104] As of 2017 the Azusa Land Reclamation Company Landfill is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit. This landfill permits a daily intake of 6,500 tons, and has a remaining capacity of 55.7 million tons.[105] Chiquita Canyon Landfill is also a Class III landfill accepting non-hazardous solid waste including C&D waste that serves the area. As the Chiquita Canyon Landfill has approached its max capacity the Los Angeles County Board of Supervisors approved a Conditional Use Permit (CUP) for the Landfill, which became effective on July 28, 2017. The new CUP limits the Landfill's amount of all incoming material, including beneficial use, to an average of 8,974 tons-per day until the end of 2024.[106]

Construction

As the Project Site is vacant, the Project would not result in a significant amount of demotion waste. However, implementation of the Project would generate construction waste. Construction debris includes concrete, asphalt, wood, drywall, metals, concrete rubble, and other miscellaneous and composite materials. Table VI-29, Estimated Project Construction Solid Waste, presents the Project's estimated construction waste.

Table VI-29
Estimated Project Construction Solid Waste

Construction Activity	Size	Generation Rate[a]	Total Solid Waste Generated
Residential Construction	73,680 sf	4.39 lbs/sf	323,455 (162 tons)
Commercial Construction	4,265 sf	4.34 lbs/sf	18,510 (9 tons)
		Total:	341,965 lbs (171 tons)

Notes: sf = square feet; lbs = pounds

[a] Source: United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Material Amounts, March 2009, Table 2-1 (Residential Construction) and Table 2-2 (Nonresidential Construction).

As shown in Table VI-29, the Project would generate approximately 341,965 pounds or 171 tons of solid waste debris during construction. Building construction would occur over approximately 19 months, or 418 work days, thereby generating approximately 0.4 tons per day.

This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. In order to help meet the landfill diversion goals, the City adopted the Citywide C&D Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling C&D waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling,

[104] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2017 Annual Report, published April 2019, Appendix E-1, website: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF, accessed: August 2019.*

[105] *Ibid.*

[106] *Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, Inside Solid Waste, Vol. 91, Published August 2018, website: https://dpw.lacounty.gov/epd/tf/isw/isw_2018_08.pdf, accessed: August 2019.*

and transporting C&D waste. It requires that all C&D waste generated within City limits be taken to City certified C&D waste processors, where the waste would be recycled to the extent feasible. Moreover, there are 60 million tons of remaining capacity available in Los Angeles County for the disposal of inert waste. Some C&D waste may also be landfilled at the Class III landfill identified above. Thus, Project-generated C&D waste would represent a very small percentage of the waste disposal capacity in the region, and, as noted, the aggregate amount estimated in the above table would not all be landfilled since the Project would comply with City's recycling requirements to the extent feasible. Impacts related to solid waste disposal during construction would be less than significant.

Operation

The Project's estimated operational solid waste generation is presented in Table VI-30, Estimated Project Operational Solid Waste.

Table VI-30
Estimated Project Operational Solid Waste

Land Use	Size	Generation Rate[a]	Total Solid Waste Generated (lbs/day)
Residential	64 units	12.23 lbs/unit	783
Commercial	12 employees[b]	10.53 lbs/employee	126
		Project Total:	**909**

Notes: sf = square feet; lbs = pounds;

[a] L.A. CEQA Thresholds Guide, 2006, page M.3-2.

[b] Based on a generation rate of one employee per 369 square feet of neighborhood shopping center (4,265/369). Source: Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.

In 2013, the City achieved a landfill diversion rate of 76.4 percent, which represents the highest recycling rate out of the 10 largest U.S. cities.[107] This landfill diversion rate exceeds the 75 percent diversion mandate by 2020 set forth in AB 374.[108] The Bureau of Sanitation's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.[109] The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste, and helps create markets for recycled materials.[110] Thus, at the City's diversion rate of 76.4 percent, the Project's total of 909 pounds per day of solid waste would likely result in approximately 695 pounds being recycled and the remaining 214 pounds (0.1 tons) would be landfilled per day. As such, there is adequate landfill capacity for the Project's operational impact. Furthermore, AB 341 requires multi-family residential developments with five units or more to provide for recycling services on site.

The Project would have a less than significant impact with respect to solid waste and no mitigation measures are required.

Cumulative Impacts

Water

Less Than Significant Impact. Implementation of the Project in combination with the related projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2015 UWMP. The 2015 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned

[107] *Los Angeles Bureau of Sanitation, Solid Resources, Recycling, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r, accessed: August 2019.*

[108] *California Department of Resources and Recycling, California's 75 Percent Initiative, website: https://www.calrecycle.ca.gov/calendar/75percent, accessed: August 2019.*

[109] *Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr, accessed: August 2019.*

[110] *Ibid.*

growth in the City to the year 2040 (the planning horizon required of 2015 UWMPs) under wet and dry year scenarios. The Project would be consistent with the General Plan and the site's Community Plan land use designation, and therefore, has been taken into account in the 2015 UWMP. It is unknown whether or not the related projects or other developments in the LADWP service area have been taken into account in the 2015 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2015 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (pursuant to SB 610) to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, the cumulative impact would be less than significant.

With respect to water treatment facilities, the LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[111] Therefore, the LAAFP would have adequate capacity to serve the additional water demanded by the Project (which would consume 9,774 gpd) and the related projects.

With respect to water infrastructure, the potential need for future development projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between the development of the Project and other development projects. As discussed above, the Project would have a less than significant impact on water infrastructure. Any upgrades to future development project's water infrastructure would be required to be implemented by the applicants those projects. Therefore, the cumulative impact would be less than significant.

Wastewater

Less Than Significant Impact. Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP treats an average daily flow of 275 mgd on a dry weather day, and has capacity to treat 450 mgd.[112] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (0.009 mgd) and future development projects within the HTP service area.

With respect to wastewater infrastructure in the City, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants for future development projects in the City will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be

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[111] *Better Buildings, U.S. Department of Energy, Showcase Project: Los Angeles Aqueduct Filtration Plant Modernization-Oxygen Plant Replacement, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization-%E2%80%93-oxygen-plant-replacement, accessed: August 2019.*

[112] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed: August 2019.*

required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant.

Electricity

Implementation of the Project, in conjunction with the related projects, would increase demands for electrical power. As discussed above, LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the State's energy from renewables by 2030. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of the related projects (and other development in the LADWP service area) could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Nonetheless, the 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Through the SLTRP, the LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

Natural Gas

Implementation of the Project, in conjunction with the related projects, would increase demands for natural gas. Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the LA Green Building Code. Similar to the Project, the related projects must also abide by the same statues, regulations, and programs that mandate or encourage energy conservation. SCG is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SCG regularly updates its infrastructure reports as required by law. In addition, there is no evidence to suggest that SCG will not be able to serve its service areas in the coming years as SCG has determined it can meet projected demand. Therefore, cumulative impacts are less than significant.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact

Solid Waste

Less Than Significant Impact. Implementation of the Project in combination with the related projects and other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and other development projects

generate C&D waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert C&D waste from landfills. As mentioned previously, the City is most commonly served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including C&D waste. As of 2017 the Sunshine Canyon Landfill permits a daily intake of 12,100 tons, and has a remaining capacity of 68.0 million tons.[113] Thus, this landfill would be expected to have sufficient capacity to accommodate cumulative demand.

Operation of the Project in conjunction with the related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2017 Annual Report (published April 2019 and the most recent available) projects waste generation and available landfill capacity through 2032.[114] Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for the Project and related projects. Therefore, cumulative impacts from solid waste would be less than significant.

20. WILDFIRE

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

a) Impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located in a Very High Fire Hazard Severity Zone;[115] nor is the Project Site within a wildland fire hazard area.[116] The Project Site is located in an established urban area that is well served by an existing roadway network. There are no critical facilities, lifeline systems, or disaster routes in the immediate vicinity of the Project Site.[117,118] However, E. 1st Street and S. Soto Street are classified as Secondary Disaster Routes by Los Angeles County.[119] Nonetheless, as discussed in Section VI.17, Transportation, above, the Project would not result in any significant traffic impacts. Moreover, the

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[113] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2017 Annual Report, published April 2019,, website: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF, accessed: August 2019.*

[114] *Ibid.*

[115] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[116] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

[117] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

[118] *Ibid.*

[119] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles West Area, website: http://dpw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-South.pdf, accessed: August 2019.*

Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, with respect to wildfire hazards, the Project construction would not result in the impairment of an adopted emergency response plan or emergency evacuation plan. No impact would occur and no mitigation measures would be required.

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

No Impact. The Project Site is not located in a Very High Fire Hazard Severity Zone;[120] nor is the Project Site within a wildland fire hazard area.[121] The Project is not located in a sloped area and is surrounded by urban development. As such, the Project would not exacerbate wildland risks, and would not expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. No impact would occur and no mitigation measures would be required.

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

No Impact. The Project Site is not located in a Very High Fire Hazard Severity Zone;[122] nor is the Project Site within a wildland fire hazard area.[123] The Project will not require the installation of infrastructure that may exacerbate fire risk. Project operation would generate traffic in the Project Site vicinity and would result in some modifications to access to the Project Site from the streets that surround it. However, adequate access to evacuation routes and emergency access to the Project Site and to the surrounding area would continue to be provided. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by the LAFD. No impact would occur and no mitigation measures would be required.

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[120] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[121] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

[122] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[123] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

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 a Very High Fire Hazard Severity Zone;[124] nor is the Project Site within a wildland fire hazard area.[125] The Project Site is surrounded by urban development and is not adjacent to any wildlands. As discussed in Section VI.10, *Hydrology and Water Quality*, according to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain. In addition, the Project Site is not located within the proximity of an enclosed body of water. The Project Site is relatively flat with little topography that would expose people or structures to landslides. With implementation of the Project, rainwater harvesting and/or bio-filtration flow-through planters would be provided and the overflow discharge would be discharged to S. Soto Street and E. 1st Street via a curb drain or parkway drain. The Project would not contain uses or activities that would exacerbate existing environmental conditions. As discussed in Section VI.7, *Geology and Soils*, the Project Site is not located within a landslide inventory area. As such, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes. No impact would occur and no mitigation measures would be required.

Cumulative Impacts

No Impact. The related projects are all located highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. As such, cumulative impacts would not be cumulatively considerable and there would be no impact..

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant. The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area and two of the Project Site's parcels currently vacant. The other four Project parcels include the Metro Soto Station and Plaza. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site does include trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and

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[124] *City of Los Angeles Department of City Planning Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: August 2019.*

[125] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Project implementation would result in the loss of the existing trees on site. Therefore, the Project would comply with regulatory compliance measure RCM BIO-1 to ensure impacts to migratory birds are reduced. As such, impacts related to disturbance to nesting birds would be reduced to less than significant.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Section VI.5, there are no historical resources on the Project Site and no historical resources would be demolished, altered, or relocated as a result of the Project.

Since Project-related excavation is expected to extend to approximately 11 feet below existing surface, it could encounter paleontological resources and result in a potentially significant impact to paleontological resources. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with the prescribed Project specific mitigation measures. Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment.

Impacts related to the substantial degradation of the environment would be less than significant.

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 concluded throughout this SCEA, cumulative impacts related to all of the above environmental factors would be less than significant. No mitigation measures are required.

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

Less Than Significant. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through either regulatory compliance and/or the implementation of project design features including PDF HAZ-1, the implementation of a soil vapor barrier, identified within this SCEA analysis. Impacts would be less than significant.