Attachment B

Explanation of Checklist Determination

I. Aesthetics

The section is based in part on the following items, included as **Appendix B** of this SCEA:

B-1 Shade Study, Scott Johnson, August 2016.

B-2 ZI-2452, City of Los Angeles.

In September 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." 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 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 City has issued Zoning Information File 2452 (ZI 2452) regarding aesthetic and parking impacts for specified projects located in a transit priority area (see Appendix B-2 of this SCEA). ZI 2452 summarizes the provisions of SB 743 and specifies that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impacts shall not be considered an impact for infill projects within transit priority areas. Under ZI 2452, a project shall be considered within a transit priority area if all parcels within the project site have no more than 25 percent of their area farther than one-half mile from a major transit stop and if not, more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from a major transit stop. ZI 2452 also includes a map showing the transit priority areas in the City.

The Project contains multiple uses, including residential and retail.[1] The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been

[1] LAMC Section 12.03.

previously developed.[2] As described in the Project Description, the Project Site is currently developed with an office building and parking structure. The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[3] The Project Site is within approximately 675 feet west the intersection of Wilshire Boulevard and Normandie Avenue, which provides access to the Metro Purple Line Wilshire and Normandie Station, (which is a major transit stop), Metro Rapid 720, and Metro Line 20. See **Table B-1, Transit Priority Analysis**.

Table B.1-1
Transit Priority Analysis

Line	Direction	# Trips	Total Trips	Average Frequency	Qualifies?
Metro Purple Line	Eastbound	Every 10 minutes	Every 10 minutes		Yes
		Every 10 minutes	Every 10 minutes		
	Westbound	Every 10 minutes	Every 10 minutes		
		Every 10 minutes	Every 10 minutes		
Metro 20	Eastbound	13 AM Peak Hours trips	38	11.05 minutes	Yes
		25 PM Peak Hours trips			
	Westbound	17 AM Peak Hours trips	37	11.35 minutes	
		20 PM Peak Hours trips			
Metro 720	Eastbound	14 AM Peak Hours trips	41	10.2 minutes	Yes
		27 PM Peak Hours trips			
	Westbound	27 AM Peak Hours trips	41	10.2 minutes	
		14 PM Peak Hours trips			

Peak Periods are considered to be between 6:00 to 9:00 AM (180 minutes) and 3:00 to 7:00 PM (240 minutes) for a total of 420 minutes. Bus routes must have a service frequency of 15 minutes or less for the entire duration of the peak hour periods.
To determine the eligibility of the bus line, the average number of minutes per trip for each direction is calculated separately. If one or both directions fail to meet the 15 minute frequency limit, the entire bus line is ineligible for a Major Transit Stop.
The total number of trips from the point of origin during peak hours (Monday to Friday) is used. A trip is included if its median time falls within the peak hour.
To calculate the median time, the time at trip origin is subtracted from the time at arrival at final station, divided by two, and then added to origin time.
The total peak hour time (420 minutes) is then divide by the number of trips for the average number of minutes per trip.

CAJA Environmental Services, May 2019.

[2] California Public Resources Code Section 21099(a)(4)
[3] California Public Resources Code Section 21099(a)(7) and PRC Section 21155: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Therefore, pursuant to SB 743, the Project's aesthetic impacts shall not be considered a significant impact on the environment as a matter of law.[4] Nevertheless, the following aesthetics analysis is provided.

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

No Impact.

A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Project Site is in a relatively flat area of Wilshire Center along a commercial corridor (Wilshire) and adjacent to a residential uses (along Kingsley Drive and Harvard Boulevard, south of 7th Street). Other north/south streets are densely populated with multifamily residential neighborhoods. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels.

No scenic or natural setting views are visible due to the dense urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.[5] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Wilshire provides the major east-west view corridor. From the public sidewalks, there are views of the Wilshire Boulevard Temple, St. Basel's Catholic Church, and other mid-rise buildings along Wilshire. Views north and south are unremarkable showing the existing urban environment. These views would not be substantially affected by the Project buildings which would be comparable in height and size as the existing office building at the Site and the adjacent Wilshire Bank office building.

[4] ZI 2452 states that "A project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the major transit stop and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the major transit stop."

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

There is a 22-story building at 3800 Wilshire, 23-story building at 3785 Wilshire, and 22-story office building at 3580 Wilshire, all located within one block of the Project Site. The approximate height of the proposed buildings (existing 22-story office building to remain and two proposed 23-story residential buildings) would be similar to other structures in the area. Height District 2 regulates permitted FAR but does not prescribe a height limit, as such there is no height restriction. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas.

Therefore, no impact will occur.

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

No Impact.

A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Pacific Coast Highway (State Route 1) is an "Eligible State Scenic Highway – Not Officially Designated", and is approximately 10 miles west of the Project Site. [6] The Site is not within a scenic highway.[7]

The Site contains 33 street (sidewalk) trees and 41 private property trees. None of the trees are protected. The Project would remove 4 street trees and 39 private property trees and replace them per the City's Tree Replacement Program.[8]

The existing building on-site was surveyed in 2008 (Wilshire Center Koreatown Recovery Redevelopment Area, Department of Parks and Recreation Primary Record) and given a National Register of Historic Preservation Code of 3S (Appears eligible for National Register as an individual property through survey evaluation).[9] The Site was also listed in a 2009 survey (CRA Historic Resources Survey) as "Surveyed, Appears Eligible."[10]

ESA recommends that the building be considered a historical resources pursuant to CEQA and that the building be assigned a California Historic Resource (CHR) Status Code of 3CS and 5S3, noting it as eligible for listing in the National Register of Historic Places as California Register of Historical Resources as well as local designation, through survey evaluation. The building is considered a historical resource pursuant to CEQA, therefore ESA analyzed direct

[6] California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm
[7] http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF
[8] Tree Report, Harmony Gardens, October 24, 2018.
[9] http://www.preservation.lacity.org/files/Wilshire_Center_Koreatown_Recovery_Redevelopment_Area_DPR_Forms_June_2009.pdf
[10] http://preservation.lacity.org/files/Wilshire_Center_Koreatown_Recovery_Redevelopment_Area_Report_June_2009_2_of_2.pdf

and indirect impacts to historical resources that may result from the Project.

Although, the Project would have a less than significant impact under CEQA, the Project would not entirely conform to the Secretary of the Interior's Standards because of the removal of contributing (secondary) character-defining features (Garage and associated landscaping). The construction of the new residential towers and parking garage would adversely impact but not materially impair the historic significance of original architectural design of the Travelers Building pursuant to CEQA, and therefore, the Project would not result in an overall significant adverse impact because the Travelers Building would remain an eligible historical resource pursuant to CEQA. ESA has concluded that the Travelers Building would remain eligible as a historical resource at the national, state, and local levels after Project completion and therefore the Project would result in a less than significant impact under CEQA. Furthermore, no potentially significant indirect impacts to other historical resources in the Project vicinity would result from the Project. The Project would be set back from Wilshire Boulevard and sited to the rear of the Travelers Building along Harvard Boulevard and 7th Street, and would not obscure primary views of the Travelers Building at 3600 Wilshire or other historic resources in the vicinity along the primary Wilshire Boulevard Corridor and would only obscure views from the south to the north toward the rear elevation of the Project Site.[11]

Therefore, no impact will occur.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact.

The Project Site is located in an urbanized area. As such, this analysis focus on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project request includes a Vesting Zone and Height District Change from C4-2, PB-1 to (Q)C4-2. This is to reclassify a portion of the Site that is zoned for parking to be rezoned to support the Project and provide a unified zone across the Site. Height District 2 permits a floor area ratio (FAR) of six times the lot area (FAR 6:1), which would permit a total 1,027,680 square feet of Floor Area[12] based on the lot area of 171,280 square feet after street dedications. As part of the vesting tentative tract map, the Project requests 1.7% floor area increase which would permit the Project's proposed 1,045,560 square feet of floor area which includes the existing

[11] Historic Resource Assessment, ESA, October 2018.

[12] Floor Area is defined as "The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas." Los Angeles Municipal Code Section 12.03.

floor area for the commercial office building to remain. The proposed height and scale of the buildings would be consistent with the surrounding buildings. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

Other visual and aesthetic considerations

There will be landscaping around the Site at the ground floor (around the Site), on the podium deck (Level 4), and the roof of both towers. The Project would be landscaped according to LAMC Section 12.40 and 12.41.

During construction, construction walls and barriers would be erected to protect the Site from vandalism and, which have the potential to attract unauthorized bills and postings. The Project shall comply with LAMC Section 91.6205, which regulates signage on construction barriers.

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

Overall, while the Project would change the visual character of the Project Site, the height of the proposed buildings, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. As per SB 743, aesthetic impacts “shall not be considered significant impacts on the environment.” Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality and impacts 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.

A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective

surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site. As per SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

Construction

The majority of Project construction would occur during daylight hours. However, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, especially during the winter time when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Furthermore, construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project-related construction activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, the Project's aesthetics impacts would not be considered significant.

Operation

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential and commercial uses. Vehicle headlights from traffic on Wilshire contribute to overall ambient lighting levels. The Project would create additional sources of

illumination. The Site currently contains an existing office building with window illumination. There is existing security lighting as well.

The Project would construct two 23-story buildings and interior lighting through windows would increase as compared to the existing setting. Also the residential nature of the Project would create additional lighting into the night hours. The Project will provide illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient "glow" presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses.

The ground floor commercial area will have low reflectivity to allow greater visual access into the building and appeal to a pedestrian aesthetic. Upper floor windows will be less visible to the pedestrian environment and will be suitably shielded to prevent visual trespass and allow privacy to the residential spaces. As such, the Project will not result in a substantial amount of light that would adversely affect the day or night-time views in the project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized location in Wilshire Center that is already illuminated at night, and the Project's lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Site and off-site areas that do not include light-sensitive uses. This would ensue that lighting would be installed to minimize light trespass to off-site uses. As per SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

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

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used.

The Project will comply with LAMC Section 93.0117(b), which states no exterior light may cause more than 2 foot-candles of lighting intensity or generate 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

uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

The Project will not be an all-glass façade but instead will have facades that are broken up by the various articulation and balconies. The parking structure is wrapped and contained within the building, to provide a shield so that light from vehicles and building lighting does not project upwards. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. This would ensure that the building will not create substantial glare.

Based on the above, light and glare associated with Project-related operation activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. Moreover, pursuant to SB 743, the Project's aesthetics impacts would not be considered significant.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive." Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice

"Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

Thresholds of Significance

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Sensitive Uses

Sensitive uses include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

A review of the immediate surrounding uses shows there are no shadow-sensitive outdoor uses.

Shadow Analysis

The Project would be taller than 60 feet in height above the ground and would be located nearby a shadow-sensitive uses. Therefore, the following is the further analysis required by the threshold. Shadows in the vicinity are created by the proposed uses and the adjacent uses.

The difference between the shadow coverage created by existing uses on adjacent uses, as compared with the proposed Project determines whether the net change of the buildings on the Site create a significant impact. CEQA is concerned with the Project's impact on the environment, or the net change due to the Project. Environmental analyses net out the existing uses and take into account the surrounding existing uses that already are creating shadow impacts.

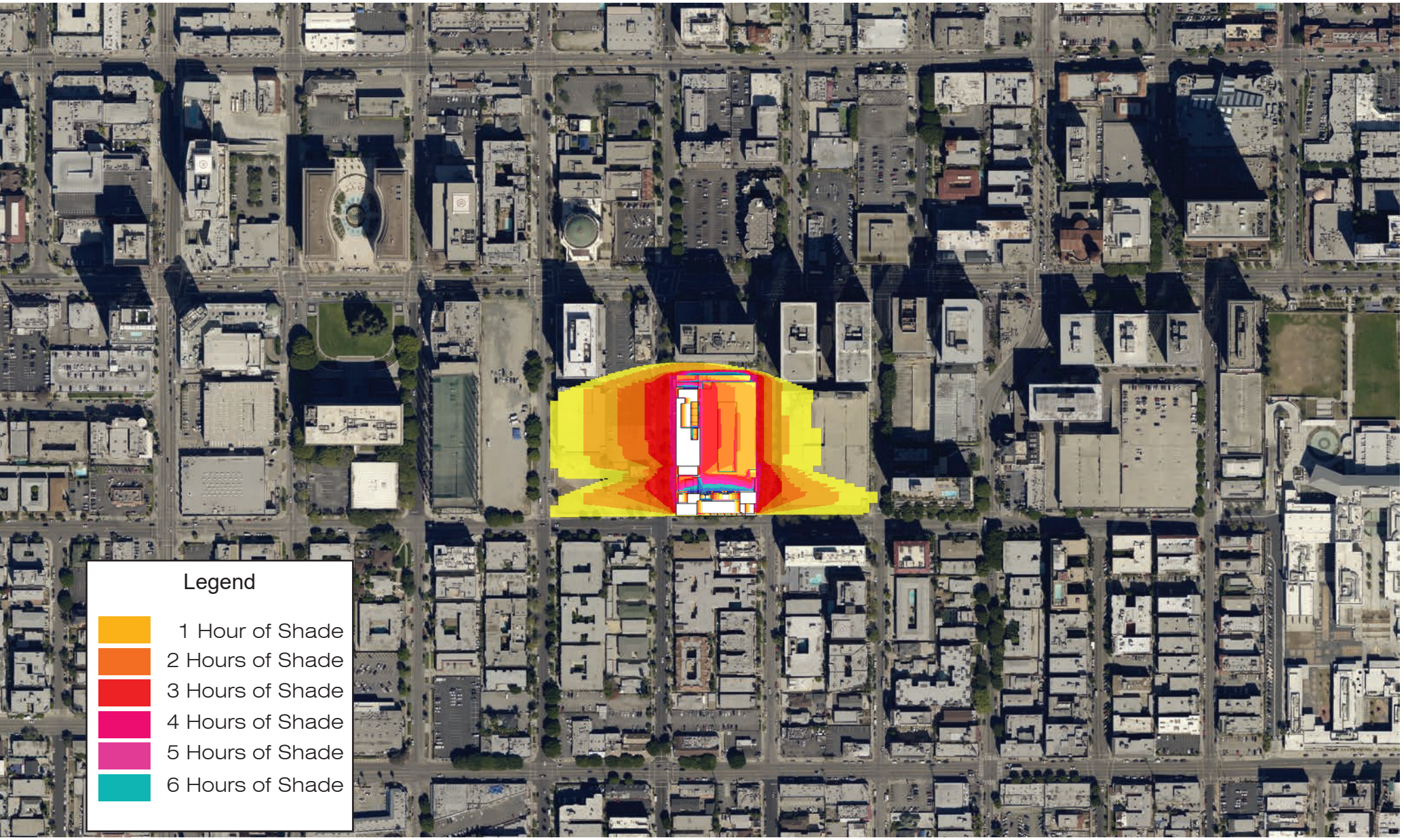
Summer Solstice

Figure B-1, Summer Shadows, contains the summer shadows figure, which projects the amount of shadow coverage at a specific location between 1 hour and 6 hours. The shadows cover the adjacent surface parking lot, the under-construction residential building on Harvard for up to 3 hours, and the parking structure on Kingsley for up to 2 hours. By the 4th hour, the shadows are contained to the streets and Project Site itself. There are no existing shadow-sensitive uses. The Project would not create a shadow for more than 4 hours during the summer on a sensitive receptor. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts during summer solstice would be less than significant.

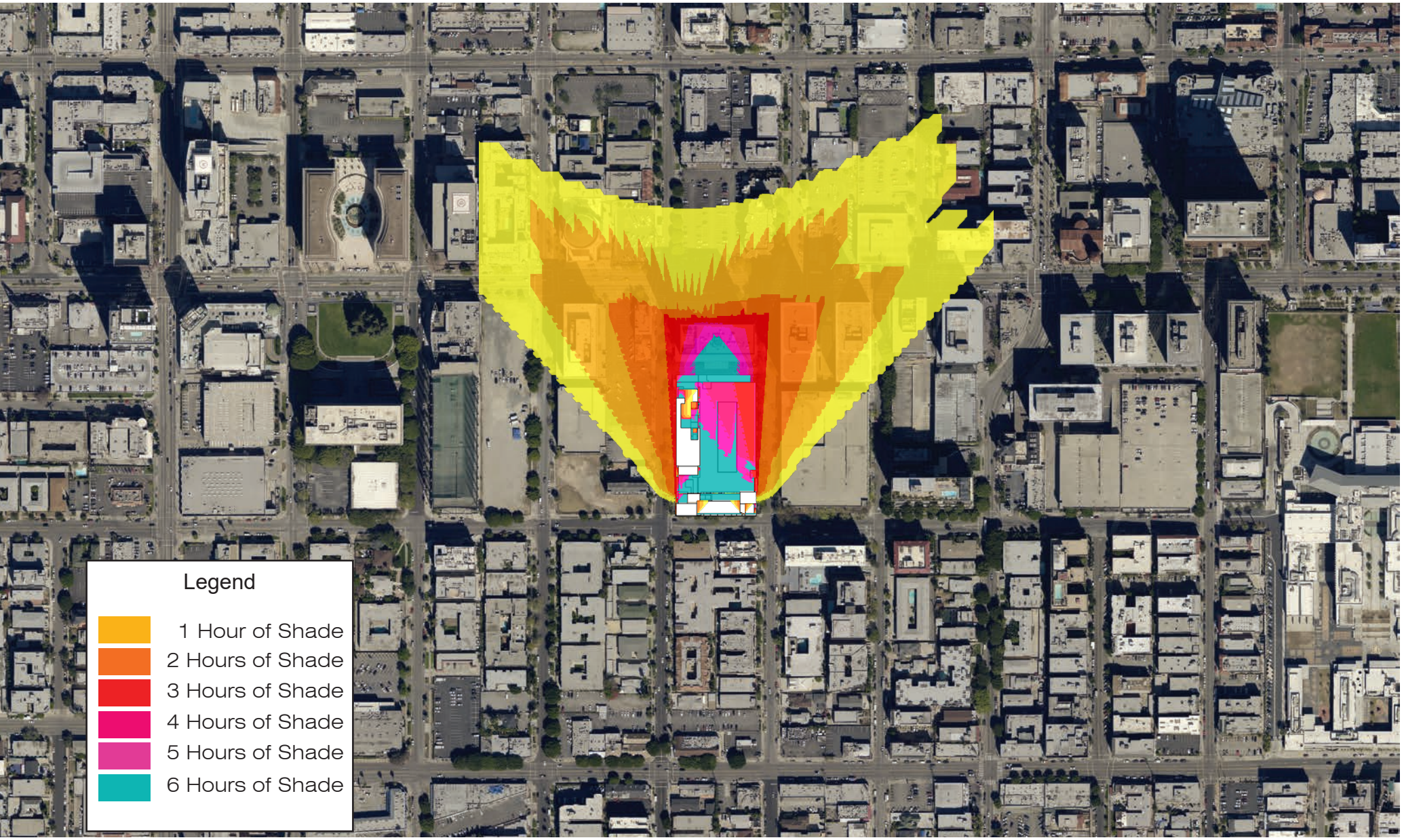
Winter Solstice

Figure B-2, Winter Shadows, contains the winter shadows figure, which projects the amount of shadow coverage at a specific location between 1 hour and 6 hours. The shadows cover the adjacent surface parking lot, the under-construction residential building on Harvard for up to 2 hours, and the parking structure on Kingsley for up to 2 hours. By the 3rd hour, the shadows are contained to the streets and Project Site itself. There are no existing shadow-sensitive uses. The Project would not create a shadow for more than 3 hours during the winter on a sensitive receptor. As per SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts during winter solstice would be less than significant.

B-1 Summer Shadows



Summer Shadows
9:00 AM - 5:00 PM
Pacific Daylight Time



Winter Shadows
9:00 AM - 3:00 PM
Pacific Standard Time

II. 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 non-agricultural use?

No Impact.

A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned PB-1 and C4-2, and the General Plan land use designation for the Site is Regional Center Commercial. The Site is developed with a building and parking structure. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[13] Therefore, the Project has no impact on the conversion of farmland to non-agricultural uses.

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

No Impact.

A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[14] The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

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))?

[13] State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, June 12, 2018.

[14] State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, accessed March 6, 2019.

No Impact.

Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impact related to forest land or timberland will occur.

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 completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

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.

A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. No impact related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

III. Air Quality

The section is based in part on the following item, included as **Appendix C** of this SCEA:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, December 2018.

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

Less Than Significant Impact.

In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the Basin), the applicable plan is the 2016 Air Quality Management Plan (AQMP), which was adopted by the South Coast Air Management District (SCAQMD) on March 3, 2017.

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures though educational programs or fines, when necessary.[15]

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen monoxide and dioxide (NO and NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor

[15] SCAQMD, http://www.aqmd.gov/nav/about.

vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[16] The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Monoxide and Dioxide (NO and NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. This is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

[16] Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

- $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

  Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available

scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the State. As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table B.3-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, maintenance for CO, and attainment/unclassified for NO_2.

State

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels.

The State standards are summarized in **Table B.3-1**. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as

nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table B.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	/a/	0.070 ppm (137 µg/m^3)	Nonattainment (Extreme)
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Nonattainment	150 µg/m^3	Maintenance (Serious)
	Annual Arithmetic Mean	20 µg/m^3	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Nonattainment (Moderate)
	Annual Arithmetic Mean	12 µg/m^3	Nonattainment	12 µg/m^3	Nonattainment (Moderate)
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance (Serious)
	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance (Serious)
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--

Table B.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
	Calendar Quarter	--	--	0.15 µg/m^3	Nonattainment
/a/ CARB has not determined 8-hour O_3 attainment status.					
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed December 13, 2018 (www.arb.ca.gov/desig/adm/adm.htm)					

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts creating the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On March 3, 2017, the SCAQMD adopted its 2016 AQMP, which is now the legally enforceable plan for meeting air quality standards for 8-hour ozone and annual $PM_{2.5}$.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains. Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. **Table B.3-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2014 through 2016. During this three-year period, the one-hour State standard for O_3 was exceeded seven times, the daily State standard for PM_{10} was exceeded 47 times,

and the daily State standard for $PM_{2.5}$ was exceeded nine times. CO and NO_2 levels did not exceed the CAAQS from 2014 to 2016.

Table B.3-2
2014-2016 Ambient Air Quality Data In Project Vicinity

Pollutant	Pollutant Concentration & Standards	Year[!] (Central Los Angeles County)		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	4
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	0	0
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0791	0.0647
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration (µg/m^3)	66	88	67
	Days > 50 µg/m^3 (State 24-hour standard)	3	26	18
$PM_{2.5}$	Maximum 24-hour Concentration (µg/m^3)	N/A	56.4	44.4
	Days > 35 µg/m^3 (Federal 24-hour standard)	N/A	7	2
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	12.6	13.4
	Days > 0.04 ppm (State 24-hour standard)	N/A	0	0

[!] Under each year is either the maximum concentration (ppm) or the days exceeding the concentration that occurred in that year.
Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed December 14, 2018. N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II,

and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Thresholds of Significance

For the purposes of this analysis, air quality impacts of the Project would be considered significant if they exceed the following Standards of Significance, which are based on Appendix G of the *State CEQA Guidelines*. According to these guidelines, a project would normally have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people.

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance.

Existing Emissions

The Project Site includes 385,520 square feet of commercial space, including office, retail, restaurants, and a bank, which would remain in operation. The parking garage serves the office building and does not independently generate any anthropogenic emissions itself. For the purposes of this analysis, the garage that is to be demolished is assumed to produce de minimis emissions.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan

The proposed residential land use will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2016 RTP/SCS, adopted in April 2016, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the Wilshire Community Plan area that implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's growth capacity, which accommodated a projected population of 337,144 and housing base of 138,330 units by 2010.[17] No further projections beyond 2010 have been prepared by the City.

As shown in **Table B.3-3**, the Project would develop approximately 760 residential units and 6,359 square feet of commercial space. The calculation of projected population uses the citywide average of 2.43 persons per multi-family households.[18] The Project could add approximately 1,847 residents to the Plan area, based on the City's projected household density. This would marginally increase population in the South Coast Air Basin. This is a conservative projection because the Project residents may not be new to the South Coast Air Basin or the City as they may be relocating from other parts of the South Coast Air Basin or the City. While the Project Site is classified as "Regional Center Commercial" in the Community Plan, these designations allow residential uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this Site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table B.3-3
Project Consistency With Air Quality Management Plan's Growth Forecast

[17] Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf. 2001.
[18] The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates.

Year	City Population	Project	City Households	Project
2020	4,017,000	1,847	1,441,400	760
2040	4,609,400		1,1,690,300	
Source: DKA Planning 2016 based on SCAG 2016 Regional Transportation Plan Growth Forecast. http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates.				

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As shown in **Table B.3-4**, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be considered less than significant. The air quality impacts of residential development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. The Project will therefore not conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and does not conflict with its six goals and 15 objectives. As such, this impact is considered less than significant.

Table B.3-4
General Plan Air Quality Element

Policy	Analysis
Policy 1.3.1 Minimize particulate emissions from construction sites.	**Consistent**. Construction activities will comply with SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM_{10} and $PM_{2.5}$.
Policy 1.3.2 Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	**Consistent**. There will be no unpaved roads or parking lots. All areas will be paved and developed.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to the Metro Purple Line Normandie station bus routes including Metro 18, 20, 66, 207, 710, 720, 757), Santa Monica Big Blue Bus Route 7, LADOT (Wilshire Center/Koreatown Loop DASH, Hollywood/Wilshire DASH), Foothill Transit Route 481.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** The Project will provide utilities and communications infrastructure that will allow tenants to telecommute.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market	**Consistent.** The Project includes a nominal amount of retail floor area that would likely not be candidates

Table B.3-4
General Plan Air Quality Element

Policy	Analysis
incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	for ridesharing or market-based incentives.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The Project includes a nominal amount of retail floor area that would likely not be appropriate for parking management strategies. If appropriate, the Project could institute parking management practices in the future. A majority of the residential units are parked at 1 or 1.5 spaces per unit to encourage transportation by public transit. The Project is nearby Metro Purple Line and Metro bus lines that could encourage transit trips and reduce vehicle travel.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project would minimize traffic impacts below significance thresholds as described in the Transportation/Traffic section. This includes reductions in trip generation from internal capture associated with the mix of residential and retail uses (15% reduction for each land use), 50% reductions from pass-by trips for the retail uses, and up to 15% reduction in vehicle trips from increased transit and walk-in trips.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be approved and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2 Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**Consistent.** The Project is an infill development that provides residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project includes pedestrian activity on the ground-floor with retail spaces. Bicycle parking will be provided per LAMC as shown in Table A-4 of Section A of this SCEA. Vehicle parking, including any charging spaces, will be on site per LAMC as shown in Table B-3 of Section A of this SCEA.
Policy 4.2.4 Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities

Table B.3-4
General Plan Air Quality Element

Policy	Analysis
discretionary projects.	alternative transportation modes, including proximity to bus routes operating by the Metro and LADOT DASH buses.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Consistent.** The Project will comply with CalGreen requirements as required by LA Green Building Code that will help to minimize energy consumption. Compliance with the City's Code is equivalent to LEED certified green building standard, which exceeds Title 24 baseline standard requirements by 10 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirement.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric of low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Table: CAJA Environnemental Services, May 2019.	

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 with Mitigation Incorporated.

A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

Construction Phase

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.2 model using assumptions from the Project's developer, including the Project's cumulative construction schedule of 25 months over the two phases of construction. **Table B.3-5** summarizes the proposed construction schedule that was modeled for air quality impact.

Table B.3-5
Construction Schedule

Phase	Phase	Duration	Notes
1. Parking Garage	Demolition of Parking Garage	12/1/21-1/15/22	Debris from 13,994 tons of asphalt, hardscape, and softscape hauled off-site to Sunshine Canyon Landfill 25 miles away
	Grading	1/15/22-3/15/22	3,500 cubic yards of soil import and 125,400 cubic yards of soil export phased. Hauling to Scholl Canyon Landfill 21 miles away.
	Garage Construction	3/15/22-6/30/22	No note.
	Architectural Coatings	2/1/22-6/30/22	No note.
2. South Tower and West Tower	Building Construction	7/1/22-12/31/23	No note.
	Architectural Coatings	8/1/23-12/31/23	No note.

Construction schedule, including start, end, and duration dates are estimates only.

Dates are non-binding and are conservative assumptions used for modeling purposes. The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.

Client provided information, December 2018.

Table: CAJA Environmental Services, December 2018.

As shown in **Table B.3-6**, construction of the Project will produce VOC, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. However, NO_x emissions during the grading phase would exceed daily thresholds for this regional ozone precursor. As a result, construction of the Project would contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone).

Table B.3-6
Estimated Daily Construction Emissions - Unmitigated

Year	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2021	5	62	39	<1	13	4
2022	69	158	84	<1	27	10
2023	71	64	96	<1	13	5
Maximum Regional Total	71	158	96	<1	27	10
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Total	65	49	35	<1	**11**	**<5**
Localized Significance Threshold	--	108	1,048	--	**8**	**5**
Exceed Threshold?	N/A	No	No	N/A	**Yes**	No

Numbers may not add up due to rounding.

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.

Source: DKA Planning, 2018 based on CalEEMod 2016.3.2 model runs. LST analyses based on 2-acre site with 25 meter distances to receptors in Central LA source receptor area.

Construction Phase Air Quality Impacts on Local Air Quality

In terms of local air quality, the Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2, CO, and $PM_{2.5}$ during the construction phase. However, construction activities could produce PM_{10} emissions during the grading portion that exceeds localized thresholds recommended by the SCAQMD. As a result, construction impacts on localized air quality are considered significant but mitigable.

The Project would comply with SCAQMD Rule 403, which controls fugitive dust.

Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

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

Construction Mitigation Measure

AIR-MM-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_x, PM_{10}, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

AIR-MM-2 To minimize fugitive dust emissions from material movement and from haul trips with an empty load, import and export of soils during the grading phases shall be phased such that a round trip haul truck will include export and import of soils.

Construction Phase Air Quality Impacts After Mitigation

As shown in **Table B.3-7**, implementation of **Mitigation Measures AIR-MM-1** and **AIR-MM-2** would substantially reduce regional and on-site NO_2 and PM_{10} emissions during the construction process, particularly during the grading phases. As a result, construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Table B.3-7
Estimated Daily Construction Emissions - Mitigated

Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2021	1	17	45	<1	5	1
2022	67	98	94	<1	12	4
2023	67	27	99	<1	12	4
Maximum Regional Total	67	98	99	<1	12	4

Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	63	5	29	<1	3	1
Localized Significance Threshold	--	108	1,048	--	8	5
Exceed Threshold?	N/A	No	No	N/A	No	No

Numbers may not add up due to rounding.

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.

Source: DKA Planning, 2018 based on CalEEMod 2016.3.2 model runs. LST analyses based on 2-acre site with 25 meter distances to receptors in Central LA source receptor area.

Operational Phase

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 3,307 net vehicle trips to and from the Project Site on a peak weekday upon full buildout of the phased development in 2023.[19] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions (**Table B.3-8**).

With regard to localized air quality impacts, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in **Table B.3-8**, these localized emissions would not exceed the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations.

The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

As a result, the Project's operational impacts on regional and localized air quality would be considered less than significant.

Table B.3-8
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	25	1	63	<1	<1	<1
Energy Sources	<1	2	1	<1	<1	<1
Mobile Sources	5	23	72	<1	25	7

[19] Fehr & Peers, Project Transportation Impact Analysis 3600 Wilshire Boulevard; January 2017.

Table B.3-8
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Total	**30**	**25**	**136**	**<1**	**25**	**7**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**25**	**3**	**64**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**108**	**1,048**	**-**	**2**	**2**
Exceed Threshold?	N/A	No	No	N/A	No	No

Numbers may not add up due to rounding.
Source: DKA Planning 2018 based on CalEEMod 2016.3.2 model runs. LST analysis based on 2-acre site with 25 meter distances to receptors in Central LA source receptor area.

Cumulative Analysis

Construction

A project's construction impacts could be considered cumulative considerable if it substantially contributes to cumulative air quality violations when considering other projects that may undertake concurrent construction activities. Construction of the Project could contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would exceed SCAQMD mass emission thresholds for ozone precursor NO_x during construction. Regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered significant but mitigable.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself could produce cumulative considerable emissions of localized nonattainment pollutants PM_{10}, as the anticipated emissions would exceed the LST threshold set by the SCAQMD. This is considered a significant but mitigable impact.

If any other proposed projects were to undertake construction concurrently with the Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST

thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

In addition, the SCAQMD would regulate fugitive dust emissions of PM10 and PM2.5 through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. These could similarly be implemented at other construction sites for any related projects. Therefore, construction of the Project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors as the implementation of the recommended mitigation measures (**AIR-MM-1** and **AIR-MM-2**) would reduce all criteria pollutant emissions below the SCAQMD's LSTs, and impacts would be less than significant.

Operation Phase Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's operational air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table B.3-8**, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a mixed-use development that would not include major sources of combustion or fugitive dust as part of its operations. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant and impact would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated.

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

The vicinity of the Project Site is densely developed, with several existing or reasonably foreseeable sensitive receptors, including:

- Multi-family residences; 3600 block of 7th Street, 90 feet south of the Project Site.

- St. Basil Catholic Church, 3611 Wilshire Boulevard, 330 feet north of the Project Site.
- Wilshire Boulevard Temple, 3663 Wilshire Boulevard, 375 feet northwest of Project Site.
- Erika J. Glazer Early Childhood Center of Wilshire Boulevard; 3663 Wilshire Boulevard, 550 feet northwest of the Project Site.
- Smiling Tree Preschool, 611 Hobart Boulevard, 825 feet northwest of the Project Site.
- Robert F. Kennedy Community Schools; 701 South Catalina Street; 1,350 feet east of the Project Site.
- Hobart Blvd. Elementary School; 980 South Hobart Boulevard; 1,980 feet south of the Project Site.
- 1-2-3 Preschool, 811 Manhattan Place, 2,000 feet southwest of the Project Site.
- St. James Episcopal Church; 625 South St. Andrews Place, 2,300 feet northwest of the Project Site.
- Seoul International Park; 3250 San Marino Street; 2,240 feet southeast of the Project Site.
- Wilshire Park Elementary School; 4063 Ingraham Street; 3,310 feet west of the Project Site.
- Wilton Place Elementary School; 745 South Wilton Place; 3,340 feet southwest of the Project Site.

Construction Phase Air Quality Impacts on Sensitive Receptors

As illustrated in **Table B.3-6**, these nearby receptors could be exposed to substantial concentrations of localized pollutant PM_{10} from construction of the Project. Specifically, construction activities would exceed the SCAQMD's LST threshold for PM_{10} and represents a significant but mitigable impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

The Project would not result in any substantial emissions of TACs during the construction phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[20] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter.

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

In addition, the SCAQMD would regulate fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. These could similarly be implemented at other construction sites for any related projects. As shown in **Tables B.3-7**, construction of the Project would not have any significant impacts on pollutant concentrations at nearby receptors, as the implementation of the recommended mitigation measures (**AIR-MM-1** and **AIR-MM-2**) would reduce all criteria pollutant emissions below the SCAQMD's LSTs.

Operation Phase Air Quality Impacts on Sensitive Receptors

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, Sox, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[21]

The Project would not result in any substantial emissions of TACs during the operations phase. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[22] The Project would generate a minimal number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant. Long-term operation of the Project would have a less than significant impacts on pollutant concentrations at nearby receptors.

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.

[21] Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.
[22] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project will introduce additional commercial and residential uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses.

Based on the above, the Project would not result in other emissions affecting a substantial number of people during either construction or operation of the Project, and impacts would be less than significant.

IV. Biological Resources

The section is based in part on the following item, included as **Appendix D** of this SCEA:

D Tree Report, Harmony Gardens, October 24, 2018.

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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact.

A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife[23] (CDFW) or the U.S. Fish and Wildlife Service (USFWS).

The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a building and parking structure. There are no City or County significant ecological areas on the Project Site.[24] The Project will result in the removal of vegetation and 4 street trees and 39 private property trees[25] around the Project Site and excavation of the ground for subterranean parking.

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 Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Compliance with the regulations of the CDFW[26] and USFWS[27] would ensure impacts are less than significant.

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, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact.

[23] Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: http://www.dfg.ca.gov/about/namechange.html.
[24] Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/.
[25] Tree Report, Harmony Gardens, October 24, 2018.
[26] http://www.leginfo.ca.gov/.html/fgc_table_of_contents.html
[27] https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php

A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[28] Therefore, no impact to riparian habitat or sensitive natural community will occur.

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.

A significant impact would occur if state or federally protected wetlands would be modified or removed by a project without adequate mitigation. The Project Site is located in an urbanized area of the City. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is at MacArthur Park Lake classified as Freshwater Pond and located approximately 1.45 miles from the Project Site.[29] Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

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.

A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

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

Less Than Significant Impact.

[28] U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian Layer: http://www.fws.gov/wetlands/Data/Mapper.html, March 6, 2019.

[29] U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed March 6, 2019.

A project-related significant adverse effect could occur if a project would be inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance, which protects certain trees (including Valley Oak and California Live Oak, Southern California Black Walnut, Western Sycamore, and California Bay).[30]

The Site contains 33 street (sidewalk) trees and 41 private property trees. None of the trees are protected. The trees are Jacaranda, Umbrella, Silk Floss, and Mexican Fan Palm. The Project would remove 4 street trees and 39 private property trees and replace them per the City's Tree Replacement Program.[31] In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis and the street trees to be removed would be replaced on a 2:1 basis.

The Project would not impact any protected trees. Therefore, impacts would be less than significant.

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.

A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site. There are no City or county significant ecological areas.[32] The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

[30] City of Los Angeles, Ordinance No. 177404: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.
[31] Tree Report, Harmony Gardens, October 24, 2018.
[32] Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/.

V. Cultural Resources

The section is based in part on the following items, included as **Appendix E** of this SCEA:

E-1 Historic Resource Assessment, ESA, October 2018.

E-2 Archaeology response, South Central Coastal Information Center, December 12, 2016.

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

Less Than Significant Impact.

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

The Project would construct new buildings where there is currently parking structure behind an existing office building. The office building would not be physically altered by the Project. The Project would not affect the Wilshire Boulevard Temple, located at 3663 Wilshire Boulevard, northwest across Wilshire from the Project Site. The Temple is a historic resource under the name Congregation B'Nai B'rith (National Register # 81000154 and LA Historic-Cultural Monument # 116).[33] The Project's tower buildings will be located on the southern portion of the Project Site, which is further in distance from the Temple. As such, the existing office building at the Site would act as a visual buffer between the resource and the proposed buildings. Other historic resources, such as the Wiltern Building (southeast corner of Wilshire and Western), Normandie Hotel (3600 6th Street), and Wilshire Christian Church Building (634 Normandie) are further away and would not be affected by the Project due to the distance and intervening buildings.

The Site was previously evaluated in 2009 as part of the Wilshire Center/Koreatown Recovery Redevelopment Area, and was identified as individually eligible for listing in the National Register of Historic Places (National Register) and the California Register of Historical

[33] http://historicplacesla.org/reports/a6dd8071-e28a-4659-aa72-5a825a104bfa

Resources (California Register). It has not been identified as contributor to a potential or designated historic district.

ESA conducted an intensive-level investigation which included a pedestrian survey, research, and evaluation of the Project Site. ESA evaluated the Site under the following historical and architectural themes which are identified in SurveyLA's Los Angeles Citywide Historic Context Statement: Corporate International Style Architecture (1946-1976); and Public Art (1900-1980), subtheme: Murals (1920-1980) 1980); and The Rise of Corporations and Corporate Types, High-Rise Corporate Office Buildings (1945-1975) subtheme. Additionally, ESA also developed historical context for Wilshire Boulevard Development (1890-1966), and Robert Tyler, architect at Welton Becket and Associates.

As a result of its investigations, ESA evaluated the current improvements on the Site, including the Travelers Building, Garage and associated landscaping. The Site was evaluated as eligible under applicable federal, state, and local criteria. In its present condition, the Site conveys a significant association with development patterns of Wilshire Boulevard, Corporate International Style Architecture, Welton Becket and Associates, and Robert Tyler, architect. The Site is an outstanding and intact example of the Corporate International Style, and is a distinctive example of its type and style on the Wilshire Corridor. It is one of Robert Tyler's notable works as Director of Design for Welton Becket and Associates, a master architect. The building features an original mosaic mural in the lobby by Modern artist, Gyorgy Kepes that has high aesthetic value both individually and as a contributing feature of the building. The Site is intact and has undergone very little alteration since its period of significance and retains a high level of architectural integrity.

ESA agrees with the previous survey that the Site "appears eligible for NR as an individual property through survey elevation" (CHR Status Code 3S). Furthermore, ESA recommends that Site be considered a historical resources pursuant to CEQA and that the Site be assigned a California Historic Resource (CHR) Status Code of 3CS and 5S3, noting it as eligible for listing in the National Register of Historic Places as California Register of Historical Resources, as well as local designation, through survey evaluation.

The Site is considered a historical resource pursuant to CEQA, therefore ESA analyzed direct and indirect impacts to historical resources that may result from the Project. While the Project would retain and protect the eligibility of the Travelers Building designed by master architect Robert Tyler, the Project would remove the contributing (secondary) character-defining Garage and associated landscaping. According to the Historic Resources Assessment, the Travelers Building contains the primary character-defining features while the garage and landscaping are secondary features. Primary character-defining features are by definition the most important and should be considered for retention in order to preserve and protect the eligibility of the subject property as a historical resource.[34] Removal of these contributing (secondary) character-defining

[34] Historic Resource Assessment, ESA, October 2018, page 65.

features would impact but not materially impair the original architectural design, and would result in a less than significant impact. The Project would retain the original Travelers Building and associated pedestrian plaza, which would remain individually eligible as a historical resource, and the Project would not directly impact the Travelers Building mass on the south elevation, as the new high-rise towers would not be physically connected to the Travelers Building in any way. Additionally, the high-rise tower closest to the Travelers Building would maintain a 52-foot setback from the rear elevation. The new parking structure would be located 10-feet from the character-defining canopy and rear entrance. Standing at 268.5-feet tall, the new towers would also not exceed the Travelers Building in height. After Project completion, the Travelers Building's north, east, and west elevations, which front Wilshire Boulevard, Kingsley Drive, and South Harvard Boulevard respectively, would remain fully visible from the public-right-of-way.

Although, the Project would have a less than significant impact under CEQA, the Project would not entirely conform to the Secretary of the Interior's Standards because of the removal of contributing (secondary) character-defining features (Garage and associated landscaping). The construction of the new residential towers and parking garage would adversely impact but not materially impair the historic significance of original architectural design of the Travelers Building pursuant to CEQA, and therefore, the Project would not result in an overall significant adverse impact because the Travelers Building would remain an eligible historical resource pursuant to CEQA.

Furthermore, no potentially significant indirect impacts to other historical resources in the Project vicinity would result from the Project. The Project would be set back from Wilshire Boulevard and sited to the rear of the Travelers Building along South Harvard Boulevard and 7th Street, and would not obscure primary views of the Travelers Building at 3600 Wilshire or other historic resources in the vicinity along the primary Wilshire Boulevard Corridor and would only obscure views from the south to the north toward the rear elevation of the Site.

ESA has concluded that the Travelers Building would remain eligible as a historical resource at the national, state, and local levels after Project completion and therefore the Project would result in a less than significant impact under CEQA.

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 is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and parking structure that provides one subterranean level. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading. There is a possibility of encountering a resource.

Project design feature (PDF) **CUL-PDF-1** will be implemented to ensure that unidentified tribal cultural resources will be identified:

CUL-PDF-1 Before demolition, excavation or any other ground-disturbing activities, a selected Project archaeologist or their designee will provide a Worker Environmental Awareness Program training to construction crews that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the training, construction crews will be briefed on proper procedures to follow should unanticipated tribal cultural resources discoveries be made during construction. In addition, workers will be shown examples of the types of resources that would require notification of the Project archaeologist.

If archaeological resources are discovered during excavation, grading, or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and parking structure that provides one subterranean level. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading. No known traditional burial sites have been identified on the Project Site.

If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, work will stop immediately and the County Coroner will be contacted. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's

recommendations, the owner or the descendent may request mediation by the NAHC. Therefore, impacts would be less than significant.

VI. Energy

The section is based in part on the following item, included as **Appendix F** of this SCEA:

F Energy and Fuel Calculations, March 2019.

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

Less Than Significant Impact.

Regulatory Framework

Federal Regulations

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[35]

State Building Energy Efficiency Standards

The Building Energy Efficiency Standards (Title 24 Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards.

[35] CAFE standards: www.nhtsa.gov/fuel-economy.

The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Standards. The 2016 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.[36]

California Green Building Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2011, the California Green Building Standards Code is mandatory for all new buildings constructed in the state. The California Green Building Standards Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The California Green Building Standards Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

California Renewable Energy Resources Act

LADWP is subject to the California Renewable Energy Resources act and thus is required to commit to the use of renewable energy sources, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 mw or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas;

[36] CalGreen: http://www.bsc.ca.gov/

multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[37]

LADWP's target procurement of energy from renewable resources in 2014 is 20 percent. As of 2011, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City.

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation.

Assembly Bill 32

Assembly Bill 32 (Health and Safety Code Sections 38500–38599; AB 32), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the California Public Utilities Commission and the California Energy Commission with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

Assembly Bill 1493 (AB 1493)/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted

[37] City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. [38]

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.[39]

CARB's Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program (ACC program) was approved by CARB in 2012. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2017–2025. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. Additionally, environmentally superior cars will be available across the range of models (compacts, sport utility vehicles (SUVs), pickups, and minivans) and consumer savings on fuel costs will average $6,000 over the life of the car.[40]

Airborne Toxic Control Measure

The California Air Resources Board (CARB) has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[41] to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot

[38] Clean Car Standards—Pavley, Assembly Bill 1943, www.energy.ca.gov/low_carbon_fuel_standard/,
[39] Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/
[40] California Renewables Portfolio Standard (RPS), http://www.cpuc.ca.gov/RPS_Homepage/
[41] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf, accessed March 6, 2019.

filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Construction workers working on the Site would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a "sustainable communities strategy" (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.[42]

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG's first-ever SCS is included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Recently, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[43] The goals and policies of the Updated RTP/SCS are the same as those in the 2012–2035 RTP/SCS.

The RTP/SCS also establishes High-Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within a HQTA as designated by 2016 RTP/SCS.[44] Metro Bus Line 20, Rapid Bus 720 and Foothill Transit (FT) Line 481 stops at Wilshire and Harvard. Metro Purple Line subway has a station stop at Wilshire and Normandie, which is approximately 560 feet from the Site.

[42] Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm
[43] SCAG, 2016 RTP/SCS, dated April 2016.
[44] http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf

Senate Bill 1389

Senate Bill 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The California Energy Commission must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2015 Integrated Energy Policy Report, addresses a variety of issues related to energy efficiency, benchmarking under the Assembly Bill 758 Action Plan, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, achieving 50 percent renewable by 2030, among other issues.[45]

2017 Power Strategic Long-Term Resource Plan[46]

The LADWP released the 2017 Power Strategic Long-Term Resource Plan (SLTRP) in December 2017, which provides a 20-year framework to ensure LADWP can meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The SLTRP is an update of the 2016 Integrated Resources Plan (IRP), and reflects evolving environmental, regulatory, and economic developments. The 2016 IRP included a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; development of a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

The 2017 SLTRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 mw of large scale solar, approval of the 250 mw Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The Fit 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10mw, together with a commitment to a large utility scale project of approximately 50 mw to be built by the same vendor at LADWP's Beacon Solar site. This SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of

[45] California Energy Commission, 2015 Integrated Energy Policy Report.
[46] 2017 SLTRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556, accessed March 6, 2019.

electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.[47]

LADWP Rules Governing Water and Electric Service

Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[48] LADWP will provide a dependable supply of potable water, from available sources, in quantities adequate to meet the reasonable needs of its customers. The delivery of such supply will be at the Service Connection. Generally, the LADWP will maintain operating pressures at the Service Connection of not less than 25 pounds per square inch. Pressures may be lower at times of Maximum Demand or because of unusual elevations or other special conditions.

City of Los Angeles Green Building Code

The 2017 LA Green Building Code is based on the 2016 California Green Building Standards Code and commonly known as *CAL*Green as discussed above, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into the Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete
- sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;

[47] 2016 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556, accessed March 6, 2019.

[48] LADWP Rules Governing Water and Electric Service: https://www.lacity.org/your-government/government-information/city-charter-rules-and-codes

- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15% of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems; and
- Provision of electric vehicle charging stations in the parking structure; 5% of total spaces will be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Los Angeles Department of Water and Power

The LADWP provides electricity to the Project Site. The LADWP provides its 1.4 million customers with more than 26 million megawatt hours (mw-h) of electricity a year.[49] LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations and plans to acquire additional facilities as their load increases. The LADWP electricity portfolio is made up of coal (39 percent), natural gas (22 percent), renewables[50] (20 percent), nuclear (11 percent), unspecified sources (5 percent), and large hydroelectric (3 percent).[51]

Table B.6-1, LADWP Electricity Capacity, shows the LADWP electricity system capacity and

Table B.6-2, LADWP Energy Usage, shows the LADWP power usage.

[49] LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afrLoop=81976737428000, March 6, 2019.

[50] Renewables include small hydroelectric, solar, wind, geothermal, biomass and waste.

[51] LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afrLoop=82063279159000&_afrWindowMode=0&_afrWindowId=na2o8wvza_1#%40%3F_afrWindowId%3Dna2o8wvza_1%26_afrLoop%3D82063279159000%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33, March 6, 2019.

Table B.6-3, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table B.6-1
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177
Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567 Table: CAJA Environmental Services, April 2018.	

Table B.6-2
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	**23.14**
Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567. Table: CAJA Environmental Services, April 2018.	

Table B.6-3
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2018-19	8,017	12,404	1,792	268	182	22,663	5,881
2019-20	8,008	12,179	1,799	268	265	22,520	5,866
2020-21	8,013	12,059	1,806	269	345	22,492	5,872
2021-22	8,046	12,056	1,813	270	428	22,613	5,889
2022-23	8,088	12,118	1,818	271	508	22,802	5,993
2023-24	8,140	12,215	1,820	271	587	23,033	5,976
2024-25	8,201	12,339	1,823	272	650	23,286	6,029
2025-26	8,258	12,462	1,828	273	716	23,537	6,076
2026-27	8,327	12,602	1,833	273	771	23,807	6,129
2027-28	8,399	12,742	1,838	274	826	24,078	6,182
gw-h – gigawatt-hours; mw – megawatts Misc. includes streetlighting, Owens Valley, and intra-departmental LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=692892870477547&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D692892870477547%26_afrWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4 Table: CAJA Environmental Services April 2018.							

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.[52]

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:[53]

- Load Factor (%) = (kw-h / hours / kw) X 100%

- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Natural Gas Supply and Demand

The Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout southern California, including the Project Site. SCG owns and

[52] LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afrLoop=1251830725757441, April 14, 2015.

[53] Madison Gas and Electric, Glossary for Load Factor: http://www.mge.com/about/electric/glossary.htm#f, November 19, 2016.

operates 95,000 miles of gas distribution mains and service lines, gas transmission compressor stations, underground storage facilities, as well as nearly 3,000 miles of transmission and storage pipeline. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.[54] Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2018 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.74% from 2018 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2018 to 2035, residential demand is expected to decline from 236 Bcf to 186 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 117 Bcf in 2018 to 1112 Bcf by 2035. The change reflects an annual growth rate of 0.5% over the forecast period. The noncore, non-EG markets are expected to decline from 177 Bcf in 2018 to 156 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is expected to remain at about its 2015 level through 2035 as gains are offset by the depletion of older oil fields.[55]

In 2018 gas demand for California is projected to average 5,871 million cubic feet per day (cf/day) and is projected to decrease to 5,381 million cf/day by 2035, a decline of 0.5 percent per year.[56] **Table B.6-4, Statewide Total Supplies and Requirements**, shows the anticipated statewide total supplies and requirements for natural gas for 2018 to 2022. In 2017 (the latest

[54] 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.
[55] 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.
[56] 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

data available from the 2018 California Gas Report), SCG's highest winter sendout was 3,456 million cf/day and highest summer sendout was 3,481 million cf/day.[57]

Table B.6-4
Statewide Total Supplies and Requirements

	2018	2019	2020	2022	2025
Utility Supply Source					
California Sources	87	87	87	87	87
Out-of-State	4,886	4,731	4,654	4,634	4,622
Non-Utility Served Load	1,131	1,093	1,056	1,054	1,028
Statewide Supply Source Total	**6,104**	**5,910**	**5,797**	**5,775**	**5,738**
Utility Requirements					
Residential	1,160	1,146	1,128	1,115	1,098
Commercial	495	492	488	485	479
Natural Gas Vehicles	50	53	56	59	62
Industrial	1,014	1,018	1,009	1,017	1,028
Electric Generation	1,651	1,505	1,458	1,444	1,441
Enhanced Oil Recovery Steaming	46	46	45	46	46
Wholesale/International Exchange	249	251	251	252	251
Company Use and Unaccounted-For	75	73	71	71	72
Non-Utility Served Load	1,131	1,093	1,056	1,054	1,028
Statewide Requirements Total	**5,871**	**5,677**	**5,564**	**5,542**	**5,505**

All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding.
Average temperature and normal hydro year.
2018 California Gas Report:
https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf
Table: CAJA Environmental Services, March 2019.

The SCG demands for 2015 and 2035 are shown in **Table B.6-5**. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.[58]

Table B.6-5
SCG Natural Gas Demands

	2015	2035	Difference

[57] 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.
[58] 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

Residential	236	186	236
Core Commercial	117	112	117
Non-Core Commercial	177	156	177

All measurements in billion cf
2018 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.
Table: CAJA Environmental Services, March 2019.

Methodology

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod. Energy impacts associated with transportation during operation were also assessed. The 2016 Title 24 standards, which went into effect on January 1, 2017 are 28 percent more efficient than the 2013 Title 24 standards for residential construction and five percent more efficient for non-residential construction and are included in CalEEMod version 2016.3.2.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[59] LADWP's target procurement of energy from renewable resources was 20 percent by 2010. As of 2012, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that

[59] City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

would meet Project demand. LADWP is committed to reach a goal of 35% renewable energy by 2020.[60]

With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City's Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with part 2 of the following (part 1 is for one- and two-family dwellings):

> 2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6). This includes a minimum area for solar zone and points of connection between the zone and the electrical service.

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's

[60] https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afrLoop=482029044070877.

high wind resource potential.[61] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[62] In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

Project Impacts

Construction

As shown in **Table B.6-6** approximately 4,935 kWh of electricity, 1,102,785 gallons of gasoline, and 177,285 gallons of diesel are estimated to be consumed during Project construction. Project construction is expected to be completed in 2023.

Table B.6-6
Summary of Energy Usage During Construction

Energy Type	Quantity
Electricity	
Water Consumption	4,935 kWh
Lighting, equipment and other construction activities needing power	N/A[1]
Total Electricity	**4,935 kWh**
Transportation - Gasoline	
On-Road Construction Equipment (Worker)	1,102,785 gallons
Transportation - Diesel	
On-Road Construction Equipment (Vender + Haul)	177,285 gallons
Total Transportation Petroleum-Based Fuel	**1,280,070 gallons**

[61] California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.

[62] California Energy Commission, California Solar Resources, April 2005, http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF.

Water application rate= 3,020 gal/acre/day
kWh equivalent= 0.009727 kWh
1) Gallons per year of water usage for dust control is calculated based on a minimum control efficiency of 66% (three times daily) with an application rate of 3,020 gal/acre/day (Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition)) and average of 25 construction days per month.
2) CalEEMod Default: Each gallon of delivered potable water in Southern California is associated with 0.009727 kWh of electricity).
[1] Electricity usage associated with this line item is not easily quantifiable. Such electricity demand would be temporary, limited, and would cease upon the completion of construction. Detailed calculations in appendix F to the SCEA.

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Approximately 4,935 kWh of electricity[63] would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures would be consumed during Project construction. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Demolition, site clearing, grading, excavation, and trenching is projected to take approximately four months. Heavy duty construction equipment needed to complete these activities would include diesel fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. The use of haul trucks with double trailers would be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris. Heavy duty construction equipment needed during construction of the Project would include air compressors, concrete pumps, forklifts, lifts, welders, backhoes, dozers, forklifts, lifts, loaders, and rollers, the majority of which would be diesel fueled. Construction equipment fuels would be provided by local or regional suppliers and vendors.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. In 2018, California consumed a total of 4.189 billion gallons of gasoline and 623 million gallons of diesel for transportation.[64] Based on the maximum

[63] Calculation included in appendix F to this SCEA.
[64] EMFAC 2017 Emissions Inventory.

projected number of workers during each phase, the Project would use approximately 1,102,785 gallons of gasoline.[65] Construction of the Project would use approximately 177,285 gallons of diesel for the venders and hauling.[66] This would represent 0.02 percent of the statewide gasoline consumption and 0.016 percent of the statewide diesel consumption. Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[67] to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

Electricity Demand

[65] Construction VMT derived from the client provided information, and air quality trips and VMT model sheets, included in the appendix to the SCEA. Worker, vender, and haul trips x trip lengths x length of phase. VMT / mpg = gallons.

[66] Heavy duty construction equipment is primarily diesel fueled.

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

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that in 2023-24, the total electricity sales will be 2,033 gigawatt-hours (gw-h) with residential uses consisting 8,140 gw-h and commercial uses consisting of 12,215 gw-h. The peak demand would be 5,976 megawatts (mw).[68]

As shown in **Table B.6-6, Project Estimated Electricity Demand**, the Project would demand approximately 5,787,175 kwh/year (5.8 gwh/year) of electricity.

Table B.6-6
Project Estimated Electricity Demand

Land Use	Total (kwh/yr)
Residential	3,009,660
Retail	126,455
Parking Structure	2,651,060
Total Increase	**5,787,175**
sf =square feet; kw-h = kilowatt-hour; yr = year Source: CalEEMod version 2016.3.2. Table: CAJA Environmental Services, March 2019.	

The Project's annual electricity consumption would represent approximately 0.025 percent of the forecasted electricity demand in in 2023-24 (when the Project is completed).[69] Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 mw of power with a current peak of 6,177 mw. Thus, there is 1,055 mw of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow from 5,881 mw in 2018-2019 to 5,976 mw in 2023-2024.[70] Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption.

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[68] LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=692892870477547&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D692892870477547%26_afrWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4

[69] 5.8 / 23,033 x 100% = 0.025%

[70] LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=692892870477547&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D692892870477547%26_afrWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[71] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

As shown in **Table B.6-8, Project Estimated Natural Gas Demand**, the Project is estimated to demand approximately 6,903,075 cf/year (18,913 cf/day) of natural gas.

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2022 is estimated at 2,916 million cf/day.[72] The Project represents approximately 0.00037 percent of the peak demand.[73] Thus, there is adequate supply capacity and no impacts would occur.

Table B.6-7
Project Estimated Natural Gas Demand

Land Use	Total (kBTU/year)
Residential	7,004,870
Retail	153,619
Parking Structure	0
Total Increase	**7,158,489 (6,903,075 cf)**

sf =square feet; cf = cubic feet; kBTU = kilo British thermal units
The conversion of kBTU to cubic feet (cf) uses the following factor: 1 cf = 1.037 kBTU
Source: CalEEMod version 2016.3.2.
Table: CAJA Environmental Services, April 2018.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural

[71] LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.
[72] 2018 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.
[73] 18,913 / 2.9 billion x 100% = 0.00037%

gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure would occur.

In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

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

The Project will implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use. The Project will comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria. The Project will comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

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

Transportation Energy Demand

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes and the Metro Purple Line rail station are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services

provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the state's total transportation fuel consumption. Based on the Project's estimated vehicle miles traveled (VMT)[74], and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 18.6 mpg,[75] approximately 548,695 gallons of gas and 136,400 gallons of diesel would be required in a year. This would represent approximately than 0.01 percent of the 2023 statewide gasoline consumption (3.7 billion gallons of gasoline) and 0.02 percent of the diesel consumption (650 million gallons of diesel). Additionally, alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. Therefore, impacts related to petroleum consumption, during operation of the Project, 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.

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

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SCG, respectively. Use of petroleum-based fuels during construction and operation would also be minimized. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or

[74] Operational VMT derived from the Air quality trips and VMT model sheets, included in SCEA Appendix C.
[75] Consistent with CalEEMod worker vehicles are assumed to be gasoline. Vendor and haul trips are assumed to be 100% diesel Heavy Duty Trucks.

energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

VII. Geology And Soils

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

The section is based in part on the following items, included as **Appendix G** of this SCEA:

G-1 Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.

G-2 Paleontology response, Natural History Museum, December 7, 2016.

a) Would the project directly or indirectly cause people or structures to 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact.

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

Faults

Recent examples of the seismic activity in the region include the 1987 Whittier Narrows earthquake and the 1994 Northridge earthquake. The closest active faults that have ruptured the ground surface in Late Quaternary time are the Hollywood Fault, which is located approximately 5.0 kilometers north of the Site, and the Newport-Inglewood Fault, which is located approximately 7.6 kilometers southwest of the Site. In addition to the active source faults that have ruptured the ground surface, potentially active blind thrust faults are also believed to exist at depth in the region of the site, including the Upper Elysian Park Thrust (Oskin et al., 2000) and the Puente Hills Blind Thrusts (Shaw and Shearer, 1999). These blind thrust faults do not explicitly rupture the surface by definition, but are inferred to exist at depth based on indirect information, such as seismicity and folded stratigraphy. Other faults in the area have a potential to generate strong ground motions at the Site, such as the Raymond Fault located about 10 kilometers to the northeast, the Verdugo Fault located about 14 kilometers to the north, the Santa Monica fault located about 11 kilometers to the northwest, and the San Andreas Fault about 57 km to the northwest.

Based on research of available literature and results of Site reconnaissance, no known active or potentially active faults underlie the Site. In addition, the Site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the Site is considered low.[76] Impacts would be less than significant.

(ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact.

The principal seismic hazard to the Project Site and proposed Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

[76] Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.

The Site is not within an earthquake fault zone.[77]

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

The Project will comply with site-specific ground motion values and seismic design criteria requirements of LADBS Grading Division.[78] Therefore, impacts related to seismic ground shaking will be less than significant.

(iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact.

Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Site is not within a liquefaction zone.[79]

According to the City of Los Angeles ZIMAS mapping system the Project Site is not classified within an area susceptible to liquefaction.[80]

According to the General Plan Safety Element, the Project Site is not within a liquefaction area.[81]

The Seismic Hazards Map of the Hollywood Quadrangle does not classify the Site as part of a liquefiable area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. A Site-specific liquefaction analysis was performed. The analysis indicates that the underlying soils would not be prone to

[77] https://maps.conservation.ca.gov/cgs/EQZApp/app/

[78] A comprehensive geotechnical engineering investigation will be necessary during permitting in order to provide design recommendations for the proposed development and be suitable for permit purposes. This geotechnical assessment is for environmental and planning purposes.

[79] https://maps.conservation.ca.gov/cgs/EQZApp/app/

[80] ZIMAS search: http://zimas.lacity.org/.

[81] Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, September 14, 2016.

liquefaction. Based on these considerations**,** the potential for liquefaction is considered remote.[82] Impacts associated with liquefaction will thus be less than significant.

(iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact.

A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The Site is not within a landslide zone.[83]

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[84]

The General Plan Safety Element does not identify any area around the Project Site as a bedrock or probable bedrock landslide area.[85] The probability of seismically-induced landslides affecting the Site is considered to be remote, due to the lack of significant slopes on the Site and in surrounding area.[86] Therefore, no impacts with respect to landslides will occur**.**

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

Less Than Significant Impact.

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing parking structure) and grading would expose soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion is unlikely to occur.

The Project includes two subterranean levels. Grading and excavation will also include a depth required foundation footings and soil compaction.

All grading activities require permits from the City of Los Angeles Department of Building and Safety, which reviews compliance with requirements and standards designed to limit potential

[82] Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.
[83] https://maps.conservation.ca.gov/cgs/EQZApp/app/
[84] ZIMAS search: http://zimas.lacity.org/.
[85] Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed November 16, 2016.
[86] Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.

impacts to acceptable levels. In addition, all on-site grading and Site preparation will comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 shall be provided to the satisfaction of the Los Angeles Department of Building and Safety. With the implementation of the required construction BMPs, soil erosion during construction impacts will be less than significant.

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

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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact.

A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. As discussed in the response to Questions 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for liquefaction or landslides.

Seismically-Induced Settlement

Seismically-induced settlement or compaction of dry or moist, cohesion-less soils can be an effect related to earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures. Some seismically-induced settlement of the proposed development should be expected as a result of strong ground-shaking. However, due to relatively dense and uniform nature of the underlying earth

materials, excessive differential settlements would not be expected to occur.[87] Therefore, impacts will be less than significant.

Based on the geotechnical exploration, laboratory testing, evaluation and research, the Project is considered feasible from a geotechnical engineering standpoint. It will be necessary to perform a Project-specific geotechnical engineering investigation to provide design recommendations for the Project as is standard City practice for permit purposes.[88] The Project would comply with site-specific ground motion values and seismic design criteria requirements of LADBS Grading Division.[89] This would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts will be less than significant.

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

Less Than Significant Impact.

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils contain significant amounts of clay which may expand or shrink with moisture variations.

Expansive index testing of the upper Site soils indicate the soils are in the critical expansion zone, with expansion index of 130 (which is the expansion potential rating of the percent swell x the fraction passing through a #4 sieve).[90] Floor slabs and foundations would be designed for the potential effects of expansive soils.[91]

Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, LAMC, and other applicable building codes which includes building foundation requirements appropriate to Site-specific conditions.

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

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

87 Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.
88 Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.
89 A comprehensive geotechnical engineering investigation will be necessary during permitting in order to provide design recommendations for the proposed development and be suitable for permit purposes. This geotechnical assessment is for environmental and planning purposes.
90 https://www.fema.gov/media-library-data/20130726-1825-25045-8152/expansive_soils_explanations.txt
91 Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.

No Impact.

This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

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

Less Than Significant Impact.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and parking structure that provides one subterranean level. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading.

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

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

VIII. Greenhouse Gas Emissions

The section is based in part on the following item, included as **Appendix C** of this IS/SCEA:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, December 2018.

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.

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of greenhouse gases (GHGs) across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world. Climate change analyses are also unique because emitting CO_2 into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Pollutant and Effects

Various gases in the Earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is retained, warming the atmosphere. This phenomenon is known as the greenhouse effect. GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor

vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[92]

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[93]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[94] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

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

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

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

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[95] As shown in **Table B.8-1**, the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

92 California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.
93 United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).
94 United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N_2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001
95 California Air Resources Board, Climate Change Emission Control Regulations, 2004.

Table B.8-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbons (HFCs)	124-14,800
Sulfur Hexafluoride (SF_6)	22,800

Source: SCAG, Draft Program EIR for 2016 RTP/SCS. November 24, 2015.
Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope

with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

Regulatory Setting

International

Kyoto Protocol. In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020 and acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed on April 22, 2016 and ratified by 177 countries.

The Western Regional Climate Action Initiative (WCI). The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian

provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

U.S. Environmental Protection Agency has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[96] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements.

Vehicle Standards. Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (NHTSA) joint rulemaking for vehicle standards.

Energy Independence and Security Act (EISA)**.** Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

[96] Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State

Assembly Bill 1493. California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[97] Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.[98] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15. On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs the CARB to update the Climate Change Scoping Plan. A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low

[97] California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.
[98] California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[99]

Assembly Bill 32. In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[100] On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

[99] Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).
[100] CARB, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[101] ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[102] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent) to achieve 1990 levels.

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan (First Update), recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons (MMT) $MMTCO_2e$ 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the First Update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors. [103,104]

In December 2017, CARB adopted a second update to the Scoping Plan to reflect the 2030 targets set by Executive Order B-30-15 and codified by SB 32. This update calls for strategies that cap the State's GHG emissions at 260 $MMTCO_2e$ by 2030, which would represent a 40 percent reduction from 1990 levels. This includes several key elements, including:

[101] CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.
[102] CARB, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed June 2014.
[103] CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].
[104] CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

- Relying on California's previously-codified statutory commitment to generate at least half of its electricity from renewable resources by 2030;
- Making more stringent CARB's pioneering Low Carbon Fuel Standard;
- Depending on the California Energy Commission to strengthen dramatically the state's already-stringent building and appliance efficiency standards;
- Enforcing strong new rules to reduce state methane and other short-lived climate pollutants that are especially pernicious;
- Supporting and preserving California's natural and working landscapes in order to enhance carbon sequestration;
- Devising transformative changes to California's public and private transportation sectors, including a ramped-up conversion of private vehicles from carbon-based to alternative fuels, increased public transit opportunities and progressive land use policies that allow Californians to live closer to their workplaces, thus reducing individual and statewide vehicle miles traveled; and
- Continuing the State's cap-and-trade program.

As shown in **Table B.8-2**, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Table B.8-2
Emission Reductions Needed To Meet AB 32 Objectives In 2030

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	108	-8	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	152	-32	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable

			Freight Strategy
High Global Warming Potential	98	-15	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	7	-29	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Source: California EPA, "California's 2017 Climate Change Scoping Plan", Nov. 2017.			

Cap and Trade. ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration. Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by ARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,[105] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[106] However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[107] The "expected completion date" for this recommended action is 2017.[108] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

Senate Bill 1368. Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines. In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;

- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;

- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB's recommended CEQA thresholds;

- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;

- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and

[105] California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.").
[106] See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.
[107] CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).
[108] Id.

- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375. On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals 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 ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations ("MPOs") to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (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. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[109]

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[110] There is currently no timetable for finalized thresholds.

On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[111] For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.[112]

[109] American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841.
[110] California Air Resources Board. http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf.
[111] CARB. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375. http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf.
[112] CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

In October 2017, ARB released its final report recommending updates to the SB 375 GHG emission reduction targets across the State.[113] This addresses several statutory, technological, and policy factors that have changed since the original 2010 targets. The proposed 2020 targets for the SCAG region remain at eight percent reductions, while the proposed 2035 target could increase from a 13 percent to a 21 percent reduction.

Title 24 Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (CCR), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The 2016 CALGreen Code became effective January 1, 2017.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds. The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to

[113] https://www.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf accessed June 12, 2018.

determine a project's significance, with 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[114] In the meantime, the project level thresholds are used as a non-binding guide.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and car-sharing/ride-sourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[115] These measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Local (City of Los Angeles)

Green LA Plan. In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

ClimateLA Implementation Plan. To implement the Green LA Plan, the City published "ClimateLA", which included a baseline GHG emissions inventory for the City, identified

[114] SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.
[115] Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8.

enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- Green Building: The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.

- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.

- Waste: Reduce or recycle 70 percent of trash by 2015 [note that the City has achieved a diversion rate of 76%].

- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to "daylight" streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan. On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City's mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[116] Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED)

[116] City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).

certified level. LEED certification generally ensures that projects exceed Title 24 (2016) standards.[117] The City's ordinance affects the following types of development:[118]

1. New non-residential building or structure of 50,000 gross square feet or more of floor area;

2. New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;

3. New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;

4. The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;

5. The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

6. The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

[117] U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.

[118] Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

1. The installation of water conserving fixtures (water closets, urinals)

2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Existing Emissions

The proposed Project includes 385,520 square feet of existing commercial space, including office, retail, restaurants, and a bank, which would remain in operation. The parking garage serves the office building and does not independently generate any anthropogenic emissions itself. For the purposes of this analysis, the garage that is to be demolished is assumed to produce de minimis GHG emissions.

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[119] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[120] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements. The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

[119] California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed August 1, 2016.

[120] Ibid.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[121]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist. ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.[122] For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[123] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod 2016.3.1). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[124]

Significance Criteria

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a Project's impact on greenhouse gases and climate change applicable to this Project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

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

[121] Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

[122] CARB, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed August 1, 2016.

[123] OPR Technical Advisory, p. 5.

[124] See www.caleemod.com.

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

- A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment;

- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

- 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. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance for GHG emissions. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[125] Examples

[125] See www.caleemod.com.

of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[126] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[127]

Although GHG emissions can be quantified, ARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[128] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[129]

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- SB 375;
- SCAG's Sustainable Communities Strategy; and

[126] See www.caleemod.com.

[127] See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014)(www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)(www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-SCEA_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

[128] The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2.

[129] 14 CCR § 15064(h)(3).

- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

Project Impacts

Construction

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the cumulative months of the three phases of construction activities. As shown in **Table B.8-3**, construction emissions of CO_2 would peak in 2022, when up to 43,270 pounds of CO_2e per day are anticipated during the demolition of the existing parking garage, following implementation of recommended **Mitigation Measures AIR-MM-1 and AIR-MM-2**. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table B.8-3
Estimated Construction Emissions - Mitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2021	12,090	2	0	12,148
2022	43,135	5	0	43,270
2023	23,546	2	0	23,591
Pounds per day Source: DKA Planning, 2018 based on CalEEMod 2016.3.2. Data in Appendix to this SCEA.				

Operation

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

As shown in **Table B.8-4**, the Project would emit 9,107 $MTCO_2e$ per year. This includes the amortization of construction emissions over a 30-year period.

Table B.8-4
Estimated Annual CO_2e Greenhouse Gas Emissions

Scenario and Source	Annual CO_2e Emissions
Area Sources	13
Energy Sources	3,607
Mobile Sources	4,506
Waste Sources	181
Water Sources	629
Construction	172
Total Emissions	9,107

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.
Source: DKA Planning, 2018.

CARB's 2014 First Update to the Climate Change Scoping Plan show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 to 2050 goals, they demonstrated that various combination of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that statewide GHG are reduced to 40 percent below 1990 levels by 2030. SB 32 involves increasing renewable energy use, imposing tighter limits on the carbon content of gas and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.[130] Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantifying the Project's GHG emissions in 2030 and 2050 impacts of those

[130] California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014, page 32.

emissions relative to the 2030 and 2050 targets currently is speculative for purposes of CEQA.[131]

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by ARB are implemented, and other technological innovations occur. Many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050, as called for by ARB. As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

As shown in **Table B.8-5**, the Project's profile as an urban infill, mixed-use project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would range up to 15 percent from internal capture, from 0-50 percent in reductions from pass-by trips and up to 15 percent reductions from the substantial mode share from public transit and pedestrian travel. These would result in concomitant reductions in CO_2e emissions that far exceed the State's AB 32 Scoping Plan goals. As such, this analysis concludes that the Project would be consistent with the applicable goals and policies regarding statewide climate change obligations that are under the control of local governments in their decisionmaking.

Table B.8-5
Daily Vehicle Travel Reductions Associated with Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Apartments	15%	0%	25%
Retail	15%	50%	25%
Source: Fehr & Peers, Project Transportation Impact Analysis 3600 Wilshire Boulevard, January 2017.			

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.

[131] CEQA Statute Section 21080(e)(2) states that "[s]ubstantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment."

- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by the City's Green Building code.

- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the Project contains regulatory compliance measures and project design features (utility and service system section below) that would reduce the Project's GHG emissions profile. Thus, the Project's emissions demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. Project-specific impacts related to the emission of greenhouse gases would be less than significant.

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

Less Than Significant Impact.

The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with relevant plans and policies that govern climate change:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

Consistency with Executive Orders S-03-05 and B-30-15.

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and other transit providers.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by ARB in the First Update are implemented, and other technological innovations occur. Stated differently, the

Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in ARB's First Update to the AB 32 Scoping Plan.[132,133] As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce Statewide GHG emissions, including expanding energy efficiency programs, increasing electricity production from renewable resources (at least 33 percent of the Statewide electricity mix), and increasing automobile efficiency, implementing the Low-Carbon Fuel Standard, and developing a cap-and-trade program. These measures are designed to be implemented by State agencies. The Project would not interfere with implementation of the AB 32 measures. **Table B.8-6** provides an overview of Project consistency with the applicable GHG emission reduction strategies outlined by AB 32 Scoping Plan measures. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Table B.8-6
Project Consistency with AB 32 Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The Project will be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, with compliance with the City's Green Building Ordinance, the Project will exceed Title 24 standards.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio

[132] CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].
[133] CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

Table B.8-6
Project Consistency with AB 32 Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
	of energy sources to increase the use of renewable energy. LADWP had an average of 23% renewables as of 2013. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project will be compliant with the City's Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project will be compliant with the City's Green Building Ordinance and will incorporate water saving features and energy efficient fixtures into its design.
Source: CAJA Environmental Services, 2018.	

Provided in **Table B.8-7** is an evaluation of the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2017 Climate Change Scoping Plan Update*.[134] As discussed therein, the Project would be consistent with the GHG reduction-related actions and strategies of the 2017 *Climate Change Scoping Plan Update*. The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the *2017 Climate Change Scoping Plan Update*. Provided in **Table B.8-8** is an evaluation of the Project's consistency with applicable reduction actions/strategies in the 2017 Scoping Plan Update. As discussed therein, the Project would be consistent with the GHG reduction-related actions and strategies of the *2017 Climate Change Scoping Plan Update.* Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on

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

the analysis in **Table B.8-7** and **Table B.8-8** the Project would be consistent with the State's Climate Change Scoping Plan.

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Area		
SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.	SCAQMD	**Consistent.** All cooking stoves would either be electric or natural gas, not wood-burning.
Energy		
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.	LADWP	**Consistent.** LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016.[a] As LADWP would provide electricity service to the Project Site, the Project would use electricity that is produced consistent with this performance-based standard. Electricity-related GHG emissions assume that LADWP will receive at least 33 percent of their electricity from renewable sources by the 2020.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[b]	State Energy Resources Conservation and Development Commission and LADWP	**Consistent.** LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Site, the Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in Year 2021 and, therefore, the estimated GHG emissions from electricity usage provided herein conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions would be further reduced by 17 percent by Year 2030, as the electricity provided to the Project Site would meet the requirements under SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under the California Code of Regulations (CCR), Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation. The Project would support this action/strategy because it includes

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).
Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.	State, CEC, and LADWP	**Consistent.** LADWP meets the requirements of SB 1368. As LADWP would provide electricity service to the Project Site, the Project would use electricity that meets the requirements under SB 1368.
California Code of Regulations (CCR), Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	**Consistent.** The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The Project would include new appliances and lighting that comply with this energy efficiency standard. In addition, **Section B.6, Energy**, of the SCEA, demonstrates that the Project efficiently uses energy and does not result in wasteful energy use.
CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State and CEC	**Consistent.** Consistent with regulatory requirements, the Project must comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction built to 2013 Title 24 standards.[c] The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in CARB's *Climate Action Scoping Plan*. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs	Federal/ Manufacturers	**Consistent.** EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.		
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[d]	State/ Manufacturers	**Consistent.** As with the EISA, discussed above, the Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit.	State/ Manufacturers	**Consistent.** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's electricity usage per year would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity) and would be consistent with AB 32 and the Climate Change Scoping Plan.
Mobile		
Assembly Bill 1493 (AB 1493) "Pavley Standards": AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).	State, CARB	**Consistent.** The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and reduced GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions were calculated using CalEEMod that includes implementation of AB 1493 into mobile source emission factors.
Executive Order S-01-07: The Low Carbon Fuel Standard requires a 10-percent or greater reduction by 2020 in the average	State, CARB	**Consistent.** GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).[e,f]		Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.
Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	State, CARB	**Consistent.** Standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions, conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. The Project would further support this regulation since the Project would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting future electric vehicle supply equipment (EVSE) and the Project would provide EV charging stations.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB Regional, SCAG	**Consistent.** SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial retail and restaurant uses within an HQTA. Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.
Solid Waste		
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through	State	**Consistent.** GHG emissions related to solid waste generation from the Project would benefit from this regulation as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Project-related GHG

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.[g] ***AB 341 (2011)*** amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[h]		emissions from solid waste generation include a 50-percent reduction in solid waste generation source emissions per goals of the City. The Applicant would only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and, other recyclables.
Water (Three percent of project inventory)		
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	**Consistent.** Water usage rates would consistent with the requirements under City Ordinance No. 184,248, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code. Project-related GHG emissions from water related sources, accounts for compliance with water efficiency requirements. Water conservation measures include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high efficiency clothes washers and dishwashers, non- residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on- demand water heaters in commercial kitchens and restrooms, when appropriate, among others. The Project would meet the requirements of the California Green Building Standards.
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	State	**Consistent.** As discussed above under Title 24, the Project would meet this performance-based standard. Water conservation measures consistent with Green Building Code requirements include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high-efficiency clothes washers and dishwashers, nonresidential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on-demand water heaters in

Table B.8-7
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		commercial kitchens and restrooms, when appropriate, among others. The Project thereby includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.
Construction		
CARB In-Use Off-Road Regulation: CARB's in-use off- road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	**Consistent.** The Project would use construction contractors that would comply with this regulation.
CARB In-Use On-Road Regulation: CARB's in-use on- road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.	CARB	**Consistent.** The Project would use construction contractors that would comply with this regulation.

[a] California Energy Commission, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.
[b] Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.
[c] CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards.
[d] 2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.
[e] CARB, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.
[f] Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel.
[g] Cal. Pub. Res. Code § 41780(a).
[h] Cal. Pub. Res. Code § 41780.01(a).

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include:	CPUC, CEC, CARB	**Consistent.** LADWP is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As LADWP would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. It is assumed that LADWP will receive at least 33 percent of electricity from renewable sources by year 2020 and 50 percent by 2030 (with a straight line interpolation for the Project buildout year of 2026).

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would comply with this this action/strategy being located within the LADWP service area and would comply with CalGreen and Title 24 energy efficiency standards.
Implement Mobile Source Strategy (Cleaner Technology and Fuels) • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_x standard.	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	**Consistent.** The CARB approved the Advanced Clean Cars Program in 2012 that establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program likely will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project, depending on the outcome of ongoing negotiations between CARB and EPA regarding federal standards. The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG emissions reductions stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• Last Mile Delivery: New regulation that would result in the use of low NO_x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Delivery) Program.[b,c] GHG emissions generated by Project-related vehicular travel would benefit from this regulation, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also benefit from these measures once adopted. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate new residential, commercial and hotel uses within an HQTA. Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. Project-related transportation emissions would be reduced by approximately 30 percent and therefore, the Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**Consistent** Under SB 375, the CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years, which was updated in 2018. As part of the 2018 updates, the CARB has proposed a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035. The Project would be consistent with SB 375 for developing an infill project within an existing

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		urbanized area. This would concentrate new residential, commercial and retail uses within an HQTA. Project-related transportation emissions would be reduced by approximately 30 percent and therefore, the Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The Project would not involve construction of transportation facilities. The Project would benefit from this station by encouraging use of mass transit resulting in a reduction of Project-related vehicle trips to and from the Project Site.
By 2019, develop pricing policies to support low- GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**Consistent.** The Project would support this policy since the Applicant would provide electric vehicle charging stations at five percent of total code required parking spaces for the Project. In addition, electric vehicle supply wiring (EV-ready) would be available in at least 20 percent of the total code-required parking spaces for the Project.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CARB	**Not Applicable.** The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Consistent.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. The CARB has proposed an

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		amendment to the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. The amendments were released in March 2018 with the public comment period ending in April 2018. The proposed amendments would be potentially adopted in 2019 with a Board hearing and vote.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Consistent.** Senate Bill 605 (SB 605) was adopted in 2014 that directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[e] The Project would comply with the CARB SLCP Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Not Applicable.** This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. As of March 2018, CalRecycle is currently holding workshops to review draft regulatory language. Adoption of the regulations to achieve SB 1383 targets is expected in early 2019.[f]
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and

Table B.8-8
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan.		Working Lands Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

[a] Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.
[b] CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.
[c] CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm.
[d] CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.
[e] CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.
[f] CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.
Source: CARB, California's 2017 Climate Change Scoping Plan, November 2017.

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP/SCS defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's

land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Site's location near substantial local transit and bus services places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

Further, the vertical integration of land uses on the Project Site will produce substantial reductions in auto mode share to and from the Project Site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

Project design features (PDF) **GHG-PDF-1** and **GHG-PDF-2** will be implemented to ensure that the Project provides support for future electric vehicles:

GHG-PDF-1: At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

GHG-PDF-2: At least 5 percent of the total code-required parking spaces will be equipped with EV charging stations. Plans will indicate the proposed type and location(s) of charging stations, and plan design will be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5 percent requirement results in a fractional space, round up to the next whole number.

Table B.8-9 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report.

Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table B.8-9
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County. All units would be market rate.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities. Nearby transit includes Metro bus 20, Rapid 720 and the Metro Purple Line station.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The Project would help further jobs/housing balance objectives. The Project is also consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Consistent.** The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure for at least 5 percent of the off-street parking for the Project.

Table B.8-9
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure for at least 5 percent of the off-street parking for the Project.
Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

The Project would include up to 15 percent reductions in vehicle trips and VMT from internal capture, up to 50 percent in reductions from pass-by trips and up to 15 percent reductions from the substantial mode share from public transit and pedestrian travel.

Consistency with the City of Los Angeles ClimateLA Implementation Plan

Construction of the Project would generally be consistent with "ClimateLA" implementation plan, including its goal of making Los Angeles a worldwide leader in green buildings. Specifically, compliance with the City's LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (Present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions.

Construction of the Project is consistent with the "ClimateLA" plan's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions. The calculation of construction-related GHG emissions conservatively does not include any reductions associated with such solid waste programs.

Long-term operations of the Project is also consistent with the "ClimateLA" focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the Site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the mixed-use nature of the Project is consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the Project would be consistent with "ClimateLA" and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project is subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "ClimateLA" plan. The Developer has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:[135]

- High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less

[135] Water Supply Assessment, March 21, 2017.

- Showerheads with a flow rate of 1.75 gallons per minute, or less.
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Proper Hydro-zoning/Zoned Irrigation - (groups plants with similar water requirements together)
- Drought Tolerant Plants - 70% of total landscaping

The Project would also comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No. 183833) and would implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project, as applicable:

- Catch Basin Insert - a device that can be inserted into an existing catch basin design to provide some level of runoff contaminant removal.
- Catch Basin Screens
- Cistern - captures storm water runoff as it comes down through the roof gutter system, if infiltration is not feasible

With regard to waste, the Project would be consistent with the "ClimateLA" goal of reducing or recycling 70 percent of trash by 2015 (which was met). Operational efficiences will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with, and instead of would contribute funds to the General Fund which supports, "ClimateLA" and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

Table B.8-10 evaluates the Project's consistency with applicable GHG-reducing actions from the LA Green Plan.

Table B.8-10
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private	The City initiated an effort to establish green building requirements, paired with incentives, for medium- to large- private projects. Buildings account for a	**Consistent.** While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of the State Green

Table B.8-10
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
	sector development.	majority of electricity use. Each building site relates to a wide range of environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	Building Standards Code and the City's Green Building Code.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Supply* plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness). • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives, and rebates. • Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology. • Maximizing water recycling. • Enhancing stormwater capture • Accelerating cleanup of the groundwater basin. • Expanding groundwater storage.	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce indoor water use. Water conservation measures include: Energy Star-certified appliances in residential units and use of ultra low flow toilets and hand wash faucets in public facilities. Further detail is provided in **Section B.19, Utilities and Service Systems - Water**, of the SCEA.
W2	Reduce per capita water consumption by	[See W1, above.]	[See W1, above.]

Table B.8-10
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
	20%.		
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	**Consistent.** While the City has implemented this action, the Project would not interfere with the advancement of more signal timing in the City.
T6	Make transit information easily available, understandable, and translated into multiple languages.	A Los Angeles Department of Transportation (LADOT) partnership with the Personnel Department will enable DOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated greenhouse gas emissions.	**Consistent.** While this action primarily applies to the City, the Project would not impair the ability of the City to make transit information easily available, understandable, and translated into multiple languages.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2 below, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** While this action primarily applies to the City, the Project would promote a pedestrian-friendly development through the provision of ground-level neighborhood-serving commercial retail uses to activate the streets in the surrounding area. The Project Site is also located in an HQTA as designated by the 2016–2040 RTP/SCS and near regional and local transit services. The Project would provide residents and visitors with access to public transit and opportunities for walking and biking, including the installation of bicycle parking spaces in accordance with LAMC requirements.
Focus Area: Land Use			
LU 1	Promote high-density housing close to major transportation arteries.	With 469 square miles, Los Angeles is a vast and sprawling city. Yet many neighborhoods are walkable, with stores and services clustered near dense residential housing. As the city continues to redevelop and grow, there is an unprecedented	**Consistent.** The Project represents a mixed-use infill development that would provide residences and commercial retail uses within an HQTA. The Project Site is located near regional and local public transit services. The

Table B.8-10
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	Consistency Analysis
		opportunity to rethink the urban environment. Accommodating continued growth requires taking advantage of infill opportunities and increasing density along transit corridors.	Project would provide bicycle storage areas for Project residents, employees, and guests.
LU 2	Promote and implement transit-oriented development (TOD).	Transit Oriented Districts (TODs) represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto- dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	**Consistent.** While this action primarily applies to the City, the Project would concentrate new residential and commercial uses in close proximity to public transit opportunities (e.g., light rail and bus routes). The Project area is well served by public transit, including both bus and rail service.
Action		**Description**	**Consistency Analysis**
Focus Area: Waste			
Ws T1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent.** While this action primarily applies to the City, the Project would provide adequate storage areas in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or a room of specified size on the Project Site.
Source: CAJA, 2018.			

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building

Ordinance. The Project will comply with the City of Los Angeles' Green Building Ordinance standards, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level or equivalent. Projects that are LEED certified or the equivalent generally exceed Title 24 (2016) standards.[136] As such, the Project would incorporate several design elements and programs that will reduce its carbon footprint, including:

1. GHG Emissions Associated with Planning and Design. The Project will implement measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

- Access to several public transportation lines, the Metro, bus lines, LADOT DASH lines, and Metro Purple Line Western Station. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

2. GHG Emissions Associated with Energy Demand. The Project will meet Title 24 2016 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This would include:

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
    - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
    - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
    - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
    - Installed tank type water heaters will have an Energy Factor higher than .6.

[136] U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 July 20, 2016.

- Installed tankless water heaters will have an Energy Factor higher than .80.
- Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
- Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit will be adequately sized by the designer but shall not be less than one inch. The conduit will be labeled as per the Los Angeles Fire Department requirements. The electrical panel will be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location will be suitable for installing future solar panels as determined by the designer.

- Appliances will meet Energy Start designations as applicable for that appliance.

3. GHG Emissions Associated with Water Use. The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It will also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
  - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
  - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.

- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

- Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

- Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. GHG Emissions Associated with Solid Waste Generation. The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. GHG Emissions Associated with Environmental Quality. The Project will meet the strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program.

Currently, there are no quantitative ARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064 h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles policies (e.g., Green Building Ordinance, Mobility 2035 Plan, ClimateLA).

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. The Project is consistent with the approach outlined in ARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by ARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by ARB. The Project results in significant VMT reduction would be consistent with the SCS/RTP. The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code). Additionally, the Project would incorporate sustainability design features in accordance with regulatory requirements and transit credits to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions. As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. While the Project is not directly subject to the Cap and Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the

Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met. Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts are not cumulatively considerable. Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.

IX. Hazards And Hazardous Materials

As discussed above, in 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

This section is based on the following item, included as **Appendix H** of this SCEA:

H Phase I Environmental Site Assessment, CBRE, Inc., September 15, 2016.

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.

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less

than significant.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of residential, commercial, and parking uses. These typical urban uses do not involve the routine use of hazardous materials**.** Instead, the operation of the Project has limited hazardous materials similar to any other mixed-use urban development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's commercial and office uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with the operation of the Project would be less than significant.

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

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact.

A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Prior to the construction of the existing improvements, the southern three quarters of the Site were occupied by single-family residences from at least 1921 until the entire Site was razed in the late 1950s to make way for the present day developments. The northern portion of the Site along Wilshire Boulevard was occupied by commercial developments from at least 1928 until the entire Site was razed. According to the historical records reviewed, the commercial developments included a gasoline service station located at 3600 Wilshire Boulevard from at least 1929 until at least 1937, an additional gasoline service station located at 3618 Wilshire Boulevard from at least 1929 until at least 1933, and a florist located at 3624 Wilshire Boulevard from at least 1942 until at least 1951. Based on the duration since use, and redevelopment of the Site which included significant excavation of subsurface soils for construction of the building basements and foundation, none of the historical on-site operations are considered a significant environmental concern to the Site.

Site Reconnaissance

The Project Site is currently developed with a 22-story, 385,520 square foot building (containing office, retail, restaurants, and a bank) and a two-story, 224,890 square foot parking structure (807 spaces).[137]

Chemical Storage and Usage. With the exception of chemicals customarily used for routine building maintenance, cleaning, and cooling tower water treatment, CBRE did not observe any significant quantities of hazardous chemicals stored onsite. For the most part, the chemicals are stored throughout the utility floor (above the 22nd level) and throughout the basement. Generally, housekeeping in the chemical storage areas was observed to be satisfactory, however a chemical storage area in the western portion of the utility floor contained a heavily stained plastic drum of sulfuric acid with evidence of corrosion on the drum and leakage onto the concrete floor beneath. Of note, floor drains were not observed in the vicinity of the chemical storage areas. Building Engineer Mr. Ayson indicated the drum of sulfuric acid is no longer in use. CBRE recommends that the housekeeping in the chemical storage areas be improved; this could include the replacement of damaged containers, providing the chemicals with secondary containment, and maintaining MSDSs in a readily accessible area. In addition, CBRE recommends the removal of all chemicals and containers that are no longer in use and that the area of sulfuric acid leakage be cleaned up.

Underground Storage Tanks (USTs). No active USTs were identified on the subject property and no common indicators of USTs such as vent pipes, fill ports, manways, pavement cuts, fuel gauges or dispensers were observed. In addition, the Subject was not identified on the California list of registered UST facilities. No underground storage tanks were reportedly removed, closed-in-place or abandoned at the Site and no common indicators of closed tanks were observed. Mr. Ayson indicated that he was unaware of any USTs associated with the Site.

[137] *Project Applicant, June 2018.*

Aboveground Storage Tanks (ASTs). One diesel emergency generator was located outdoors in the western portion of the utility floor. Mr. Asyon was not sure as to the size of the belly tank associated with diesel emergency generator. In addition, one 55-gallon drum of diesel fuel, located in a metal flammables cabinet adjacent to the diesel emergency generator, is used to fill the generator's belly tank via a pump and rubber hose. One gasoline emergency generator was located in a generator room in the northwest corner of the parking structure's ground level. One approximately 75-gallon gasoline tank is connected to this emergency generator via metal conduit pipe. Three 5-gallon portable gasoline canisters were located adjacent to the gasoline tank with no significant evidence of staining located on the gasoline tanks, portable canisters or concrete ground surface beneath during the site visit. An area of coolant leakage from the gasoline emergency generator was observed on the concrete ground surface adjacent to the southwest of the generator. CBRE recommends that the source of leakage be repaired and that the coolant leakage be cleaned up. No additional fuel ASTs were observed and CBRE did not identify any equipment, which should require such tanks. Moreover, visual indicators of former site ASTs, such as tank cradles, secondary containment structures, tank pedestals, etc., were not observed. In addition, according to the site contact, there are no ASTs on-site.

Hazardous Waste. Bernard Yoo Dental Office is located in the Existing Building. Typically, dental offices utilize x-ray machinery and photo developing equipment, which generate a silver-containing development waste stream and medical waste. CBRE interviewed Dr. Yoo during the site visit. According to Dr. Yoo, the silver is recovered from the processing solution. The developer waste solution is picked up and disposed of by a commercial recycler on an as-needed basis. No additional hazardous waste was observed or reported to be generated on the Site. Furthermore, CBRE's review of the USEPA's database of sites regulated under RCRA did not identify the Subject as a generator of hazardous waste.

Drums and Containers for Storing Waste. Two steel 55-gallon drums were observed in the buildings loading dock area. According to Building Engineer Mr. Ayson, these drums are used to store grease waste associated with the on-site restaurant and are disposed of on an as-needed basis. With the exception of non-hazardous solid waste containers, CBRE did not identify containers suspected of storing waste. With respect to the nonhazardous solid waste containers, no significant environmental concerns were noted.

Polychlorinated Biphenyls (PCBs). The following electrical transformers were observed onsite:

Utility Floor Electrical Transformer

Basement Electrical Transformer Not Labeled

There are utility owned, pad-mounted electrical transformers on-site. Based on their presumed age, these transformers may contain between 49-500 ppm of PCBs, which classifies them as PCB contaminated. In any event, the electrical equipment CBRE observed appeared to be in good condition, free of leakage. In any event, in accordance with Title 40—Protection of

Environment, Chapter 1—Environmental Protection Agency, Subchapter R—Toxic Substance Control Act (TSCA), Part 761—Polychlorinated Biphenyls (PCBs), Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions, the owner of the transformers, Los Angeles Department of Water & Power (LADWP), is responsible for the transformers' maintenance and remediation in the event of a leak.

Hydraulic Dock Levelers. There are two above-grade hydraulic dock levelers located at the Site's loading dock on the eastern side of the office building. Inasmuch as the lifts were installed prior to the 1979 ban on the manufacturing of PCBs, the hydraulic fluid may contain PCBs. According to Building Engineer Mr. Ayson, there has been a leak associated with the dock levelers for the last two years and he has not been successful in finding a vendor to service the levelers. Mr. Ayson indicated that the dock levelers are original to the building and that he believes that PCBs are not contained within the hydraulic oils. CBRE recommends repairing the dock levelers to prevent further releases.

Asbestos-Containing Material (ACM). Based on the age of the Site, a potential exists that asbestos containing materials are present onsite. The friable spray-on fireproofing, acoustical ceiling tiles, plasters and textured ceiling finishes are suspected to contain asbestos. In addition, the non-friable resilient floor finish assemblies, wallboard assemblies, plasters, built-up roofing materials, caulking, and mastics may contain asbestos. Of note, it is possible that other suspect ACM exists in inaccessible locations such as behind walls, above ceilings, and beneath visible flooring. Since these materials were observed to be in good condition, no further action is recommended at this time other than maintaining same in good condition under an Asbestos Operations and Maintenance (O&M) Program. All activities involving ACM should be conducted in accordance with governmental regulations.

Lead-Based Paint (LBP). Based upon the age of the structure, the use of LBP is suspected. Painted surfaces observed by CBRE were generally in good condition with no evidence of pervasive peeling or flaking. Based on the conditions observed no further action appears warranted at this time.

Vapor Encroachment Screening. CBRE conducted a "Tier I" (non-intrusive) Vapor Encroachment Screening (VES) on the Site in accordance with the methodology set forth in ASTM E 2600-15 "Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions". As previously discussed, historical gasoline stations have operated onsite. However based on the duration since use, excavations associated with the construction of the on-site office building that includes a basement level, and that the Site was not listed on any regulatory database indicating a spill or release to the subsurface, a VEC is unlikely and no further investigation appears warranted. In addition, several impacted properties were identified in CBRE's regulatory database review. However, based upon hydrogeology, groundwater flow direction and the furthest known extents of the contamination, none of these properties are suspected of having petroleum or chemical contaminant plumes that would be identified as a VEC and as such, a VEC does not exist.

Conclusion

The assessment revealed no evidence of recognized environmental conditions (RECs) in connection with the Site; however, the following business environmental risks (BERs) were identified which warrant mention:

Hazardous Materials Management

During the recent site assessment, CBRE noted the following de minimis hazardous material-related items in need of repair and/or clean-up:

There are two above-grade hydraulic dock levelers located at the Subject's loading dock on the eastern side of the office building. Inasmuch as the lifts were likely installed prior to the 1979 ban on the manufacturing of PCBs, the hydraulic fluid may contain Polychlorinated Biphenyls (PCBs). According to Subject Building Engineer Mr. Ayson, there has been a leak associated with the dock levelers for the last two years and he has not been successful in finding a vendor to service the levelers. Mr. Ayson indicated that the dock levelers are original to the building and that he believes that PCBs are not contained within the hydraulic oils. As a best management practice, and to prevent further release of hydraulic fluid, the dock levelers should be repaired.

An area of coolant leakage from the gasoline emergency generator was observed on the concrete ground surface adjacent to the southwest of the generator. CBRE recommends that the source of leakage be repaired and that the coolant leakage be cleaned up.

A chemical storage area in the western portion of the utility floor contained a heavily stained plastic drum of sulfuric acid with evidence of corrosion on the drum and leakage onto the concrete floor beneath. Of note, floor drains were not observed in the vicinity of the chemical storage areas. Building Engineer Mr. Ayson indicated the drum of sulfuric acid is no longer in use. CBRE recommends that the housekeeping in the chemical storage areas be improved, including the removal of all chemicals and associated containers that are no longer in use and that the area of sulfuric acid leakage be cleaned up.

These business environmental risks are part of the existing office building conditions and not part of the portion of the site to be developed.

Asbestos-Containing Material (ACM)

Based on the age of the Site, a potential exists that asbestos containing materials are present onsite. The friable spray-on fireproofing, acoustical ceiling tiles, plasters and textured ceiling finishes are suspected to contain asbestos. In addition, the nonfriable resilient floor finish assemblies, wallboard assemblies, plasters, built-up roofing materials, caulking, and mastics may contain asbestos. Of note, it is possible that other suspect ACM exists in inaccessible

locations such as behind walls, above ceilings, and beneath visible flooring. Since these materials were observed to be in good condition, no further action is recommended at this time other than maintaining same in good condition under an Asbestos Operations and Maintenance (O&M) Program. All activities involving ACM should be conducted in accordance with governmental regulations. California classifies ACM as hazardous waste if it is friable and contains one percent or more asbestos. Non-friable bulk asbestos-containing waste is considered non-hazardous regardless of its asbestos content and is not subject to regulation. The California Environmental Protection Agency Department of Toxic Substance Control (DTSC) regulates the packaging, on-site accumulation, transportation and disposal of asbestos when it is a hazardous waste. In California, any facility known to contain asbestos is required to have a written asbestos management plan (also known as an O & M Program).

The Project would maintain the existing office building and remove the existing parking structure on the Site. If asbestos containing building materials are found to be present, those materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

If lead-based paint materials are found to be present, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

Methane

The Project Site is not within a Methane Buffer Zone.[138]

Based on the above, construction impacts would be less than significant.

Operational Health Hazards

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

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

[138] ZIMAS search: http://zimas.lacity.org/.

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.

A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is in proximity to the following schools:[139]

- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 550 feet northwest of the Site's parking structure boundary.
- Smiling Tree Preschool, 611 Hobart Boulevard, 825 feet northwest of the Project Site.
- Kennedy Community Schools, 701 S. Catalina Street, 1,350 feet east of the Project Site.

The Project will have a less than significant impact during construction (with regulatory compliance for asbestos and lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that uses of existing structures does not emit hazardous materials. The schools would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists (see question b), above) and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government

[139] LAUSD and Google Maps.

Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency:

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.[140]

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.[141]

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[142] There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[143] The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.[144]

Government Records

NPL - National Priority List**.** The Computerized Environmental Report (CER) did not identify NPL sites within the Approximate Minimum Search Distance (AMSD).

Delisted NPL. The CER did not identify Delisted NPL sites within the AMSD.

Superfund Enterprise Management System (SEMS) (Formerly known as Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)). The CER did not identify SEMS sites within the AMSD.

SEMS-ARCHIVE (Formerly known as Federal CERCLIS No Further Remedial Action Planned (NFRAP) Sites). CER did not identify SEMS-ARCHIVE sites within the AMSD.

[140] California Department of Toxic Substance Control, EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, November 16, 2016.
[141] California State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov/map, November 16, 2016.
[142] California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf, November 16, 2016.
[143] California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, November 16, 2016.
[144] California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities, November 16, 2016.

Federal Resource Conservation and Recovery Information System (RCRIS) Treatment, Storage, and Disposal (TSD) List. The CER did not identify RCRIS TSD facilities within the AMSD.

Federal RCRIS Generators List. The CER did not identify any RCRA Generators within the AMSD

Federal Corrective Action Tracking System (CORRACTS). The CER did not identify CORRACTS sites within the AMSD.

Federal Emergency Response Notification System (ERNS) List. The CER did not identify the Site on the ERNS database

Federal Institutional/Engineering Control Registries. The CER did not identify the Site on the Federal Institutional or Engineering Control registries.

FINDS contains both facility information and "pointers" to other environment database sources that contain additional detail. These other databases include: RCRIS, PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]), CERCLIS, DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), FRDS (Federal Reporting Data System), SIA (Surface Impoundments), CICIS (TSCA Chemicals in Commerce Information System), PADS, RCRA-J (medical waste transporters/disposers), TRIS and TSCA. The CER identified the Site on the FINDS database. No detailed information was identified within the FINDS database. This former Site tenant was not cross-referenced on any regulatory databases of active releases or contamination conditions. Based on the above information, this listing is not suspected to be of a significant environmental concern to the Site.

California EnviroStor, HIST Cal-Sites, Response and Tribal NPL Equivalent Hazardous Waste Sites (HWS). The CER identified 18 California and/or Tribal CERCLIS Equivalent Hazardous Waste sites within the AMSD. The two closest sites are discussed in detail below. All 16 remaining sites are located at least 0.3-mile and a significant distance from the Site and as such, are not suspected to have impacted the Site.

- Hobart/Wilton Primary School, 7th Street Between Harvard Blvd. & Hobart Blvd., approximately 70 feet southwest of the Site. Based on information obtained during the site visit, this property is occupied by three vacant lots located west of the southernmost portion of the Site's parking structure on the north side of 7th Street between South Harvard Boulevard and South Hobart Boulevard. According to the database, this listing was a School Investigation and identified as "Inactive/Withdrawn. Based on the regulatory status, this listing is not suspected as having had a negative impact on the Site.

- Belmont New Elementary School, Wilshire Boulevard at Hobart Boulevard, approximately 400 feet northwest of the Site. Based on information obtained during the site visit, this property is occupied by an apartment building located approximately 400 feet west-northwest of the Site on the north side of Wilshire Boulevard and west of South Hobart Boulevard. According to the database, this listing was a School Investigation and identified as "Inactive/Withdrawn". Based on the regulatory status, this listing is not suspected as having had a negative impact on the Site.

California and/or Tribal Solid Waste Facilities (SWF) List. Based on information obtained during the Site visit, this property is occupied by a high-rise office building located approximately 200 feet east of the Site across South Kingsley Drive and beyond the high-rise office building at 3580 Wilshire Boulevard. According to the database, this listing was a solid waste disposal site identified as "Clean/Closed". Historically, this property was occupied by residential land uses from at least 1921 (including a restaurant from at least 1950) until the development of the office building in the late 1960s. Based on the regulatory status, this listing is not suspected as having had a negative impact on the Site.

California and/or Tribal Registered Underground Storage Tanks (UST), HISTUSTs and SWEEPS UST Facility Lists. The CER did not identify sites within the AMSD.

California and Tribal Leaking Underground Storage Tanks (LUST) List and Spills, Leaks, Investigations and Cleanups (SLIC) Records. The CER identified 17 LUST/SLIC sites within the AMSD. The two closest sites are discussed in detail below. All 15 remaining sites are located at least 0.21-mile and a significant distance from the Site and as such, are not suspected to have impacted the Site.

- Arco #5355, 3675 Wilshire Boulevard, 0.11 miles northwest of the Site. According to the State Water Resources Water Quality Control Board GeoTracker database, this facility reported a release of gasoline that affected the aquifer used for drinking water supply and the regulatory status is listed as "Completed – Case Closed as of 9/24/2008". Based on the regulatory status, this site is not suspected of having had a significant negative impact on the Site.

- Kingsley Auto Texaco, 3401 W. 8th Street, 0.13 miles south of the Site. According to the State Water Resources Water Quality Control Board GeoTracker database, this facility reported a release of other solvent or nonpetroleum hydrocarbon that affected the aquifer used for drinking water supply and the regulatory status is listed as "Completed – Case Closed as of 8/6/2010". Based on the regulatory status, this site is not suspected of having had a significant negative impact on the Site.

A Case Closed status is granted to those sites that do not exhibit levels of contamination requiring clean-up, have been remediated to the satisfaction of the lead regulatory agency, or

are not suspected to represent a significant threat to human health or the environment. As such, absent additional information to the contrary, it is unlikely that contamination originating at sites with a Case Closed status have had a significant negative environmental impact on the Site.

California Deed Restriction Listing and Tribal Institutional Control/Engineering Control Registries. The CER did not identify the Site on the SMBRP, HWMP or Tribal Institutional or Engineering Control registries.

California and Tribal Voluntary Cleanup Program (VCP) Sites. The CER did not identify VCP sites within the AMSD.

California and Tribal Brownfield Sites. The CER did not identify Brownfield sites within the AMSD.

HAZNET. The CER identified the Site with six separate listings on the HAZNET database. The HAZNET database only contains information about types and quantities of wastes that are generated and not information pertaining to release events.

- The listing identified as Nara Bank, was identified on the HAZNET database for waste reporting requirements for the year 2003, concerning the removal of 168.56 tons of asbestos containing waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.

- The listing identified as King State Oil Company, was identified on the HAZNET database for waste reporting requirements for the year 1995, concerning the removal of 25.28 tons of unspecified oil-containing waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.

- The listing identified as Young Chun Inc., was identified on the HAZNET database for waste reporting requirements for the year 2012, concerning the removal of 4 tons of an unspecified waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.

- The listing identified as 3600 Wilshire Boulevard, was identified on the HAZNET database for waste reporting requirements for the years 1993, 1998, 1999, and 2000, concerning the removal of approximately 9 tons of asbestos containing waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.[145]

[145] The DTCS requires any facility known to contain asbestos is required to have a written asbestos management plan (also known as an Operation and Maintenance Program (O & M Program). SCAQMD implements Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 applies to owners and operators involved in the demolition or renovation of ACM-containing structures, asbestos storage facilities and waste disposal sites. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

- The listing identified as 3600 Wilshire Boulevard LLC, was identified on the HAZNET database for waste reporting requirements for the years 1999, 2000, and 2010, concerning the removal of approximately 86.7 tons of asbestos containing waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.

- The listing identified as John Hancock Mutual Life Insurance Company, was identified on the HAZNET database for waste reporting requirements for the years 1995, 1996, 1997, and 1999 concerning the removal of approximately 12.2 tons of asbestos containing waste. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions.

Based on the above information, these listings are not suspected to be of a significant environmental concern to the Site, and no further investigation appears warranted.

EMI - Emissions Inventory Data. The CER identified the Site on the EMI database. According to the database, the facilities were listed with the SCAQMD, associated with permits to operate. These listings are likely associated with on-site emergency generators and restaurant char-broiler equipment. No Notices of Violation and no Notices to Comply were listed. These former Site tenants were not cross-referenced on any regulatory databases of active releases or contamination conditions. Based on the above information, these listings are not suspected to be of a significant environmental concern to the Site.

Enforcement and Compliance History Online (ECHO). The CER identified the Site on the ECHO database. According to the ECHO database, environmental conditions pertaining to "Air Quality" include ozone, lead, and particulate matter were listed. No Environmental And Enforcement Conditions were noted. No information additional pertinent information was identified within the ECHO database and the current compliance status indicated no data concerning violations has been returned. This listing was not cross-referenced on any regulatory databases of active releases or contamination conditions. Based on the above information, this listing is not suspected to be of a significant environmental concern to the Site.

EDR Manufactured Gas Plants. The CER did not identify the Site or any adjacent properties on the manufactured gas plant database.

EDR Historic Auto Stations. The CER identified the Site on the historical auto stations database. Specifically, Golden Bear Service Station at 3600 Wilshire Boulevard is identified as an historic auto station with listings in 1929, 1933, and 1937. No violations or other pertinent information was identified in the database concerning this listing. In addition, Joseph Jarrett (also listed as Wilshire Super Service Station at 3618 Wilshire Boulevard is identified as an historic auto station with listings in 1929 and 1933. No violations or other pertinent information was identified in the database concerning this listing. Based on excavations associated with the construction of the on-site office building that includes a basement level, and that the Site was not listed on

any regulatory database indicating a spill or release to the subsurface, these former facilities are not suspected of having impacted the Site. The CER identified the following adjacent properties on the historical auto stations database. Specifically, Auto Tech Auto Repair at 3580 Wilshire Boulevard is identified as an historic auto station with listings in 2002. No violations or other pertinent information was identified in the database concerning this listing. This address is associated with a high-rise office building located on the eastern side of South Kingsley Drive and the listing may be associated with an office tenant or with a light auto repair concierge service typically associated with some office buildings. As this listing was not identified on any regulatory database indicating a spill or release to the subsurface, this facility is not suspected of having impacted the Site.

EDR Historic Cleaners. The CER identified the Site on the historical cleaners database. Specifically, Jet Cleaner (also listed as Fillmore Cleaners) at 3600 Wilshire Boulevard is identified as occupying the Site from 2007 to 2012; this dry cleaning business was in operation during the site visit. According to building engineer Mr. Jonathan Ayson, Jet Cleaners and Alterations is a "dropoff" point only. As such, the listing is not considered an environmental concern.

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

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

No Impact.

A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard. The Project is not within an airport hazard area.[146] The Project Site is not located within two miles of a public airport. Santa Monica Municipal Airport is located 8 miles to the west. Los Angeles International Airport (LAX) is approximately 9 miles to the southwest. Hawthorne Municipal Airport (HHR) is approximately 9.5 miles to the south. Hollywood Burbank Airport (Bob Hope Airport) is 10 miles to the north. Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore no impact would occur.

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

[146] ZIMAS search: http://zimas.lacity.org/.

Less Than Significant Impact.

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Wilshire Boulevard, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

Full-time closures to the parking lane are anticipated for the Project along the northern side of 7th Street. Parking is permitted on both sides of 7th Street. Since the closures during construction would be for the parking lane and not a travel lane, the temporary construction impacts on the roadway network would be considered less than significant. The sidewalks along Harvard Boulevard, Kingsley Drive, and Wilshire Boulevard fronting the project construction site will be open during construction. However, the sidewalk on 7th Street will be closed for the duration of construction. The sidewalk on the south side of 7th Street will be open and pedestrians are anticipated to use this as a detour throughout construction.[147] In addition, there are no emergency services located within the immediate vicinity of the affected streets. Since the closures during construction would be for the parking lane, the temporary construction impacts on the roadway network would be considered less than significant.

Major roadways throughout the City are selected disaster routes.[148] Western Avenue, located 0.25 miles to the west, is the nearest designated disaster route. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the routes, and emergency access would be maintained at all times. The future traffic conditions with the Project show that none of the 17 study intersections would have a significant impact after mitigation (see **Section B.17** of this SCEA for additional information).[149]

The Project Site is not within a Hillside Area.[150] The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

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.

147 Transportation Impact Analysis, Fehr & Peers, January 2017.
148 Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.
149 Transportation Impact Analysis, Fehr & Peers, January 2017.
150 ZIMAS search: http://zimas.lacity.org/.

A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone[151] or in the wildlands fire hazard Mountain Fire District.[152] The Project Site is not on the direct edge of a rural or wildland area. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, no impact would occur.

[151] ZIMAS search: http://zimas.lacity.org/.
[152] Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

X. Hydrology And Water Quality

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

Less Than Significant Impact.

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[153] Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPSs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include 1. Infiltration Systems, 2. Stormwater Capture and Use, 3. High Efficiency Biofiltration/Bioretention Systems, and 4. Combination of Any of the Above

[153] Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.[154] The City is in compliance with all requirements of the NPDES Municipal Permit.[155] Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the entire Site is approximately 4 acres)[156], the Project Applicant will be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[157] Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards, or discharge requirements, or otherwise substantially degrade water quality. BMPs are methods to prevent or control stormwater runoff and the discharge of pollutants. The plan requires (1) advance planning and training to ensure implementation of the BMPs, (2) erosion and sediment control BMPs in place until the area is permanently stabilized, (3) pollution prevention BMPs to keep the construction

[154] http://water.epa.gov/polwaste/npdes/.
[155] http://www.lastormwater.org/about-us/npdes-municipal-permit/.
[156] See Section A, Project Description Table A-1, Project Site.
[157] California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed March 6, 2019

site clean and (4) regular inspection of the construction site to ensure proper installation and maintenance of BMPs.[158]

Storm Water Pollution Prevention Plan. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Low Impact Development Plan. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Development Best Management Practices. The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Waste Discharge Requirements (WDR). The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the Project would have to obtain coverage under this permit. Construction-related impacts to water quality will be less than significant.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and

[158] http://www.lastormwater.org/about-us/regulatory-mandates/

similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The parking for the Project would be located within the building and not subject to rain that can create runoff.

As required for plan check, the Project would submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles and the State Water Resources Control Board (SWRCB) for review and approval prior to development of any drainage improvements. In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality will be less than significant.

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.

A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is MacArthur Park Lake, approximately 1.45 miles away. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby.

Drainage appears to occur by sheetflow along existing contours towards the City streets. Groundwater was encountered during exploration at a depth of 30 feet below the ground surface. The Seismic Hazard Zone Report for the Hollywood 7.5 minute Quadrangle indicates the historic highest groundwater level in the vicinity of the Site was on the order of 20 feet below the ground surface.[159]

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[160] The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with an office and parking structure (hardscape). The Project will similarly occupy the entire Project Site with two new buildings. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface

[159] Geotechnical Assessment, Geotechnologies, Inc., July 15, 2016.
[160] LADWP, Water, Sources of Water: https://www.ladwp.com/, accessed March 6, 2019.

covering the Project Site. Therefore, impacts will be less than significant.

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

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

Less Than Significant Impact.

A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Proper surface drainage is critical to the future performance of the Project. Saturation of soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper Site drainage would be maintained at all times. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a parking structure (hardscape). The Project will similarly occupy the entire Project Site with two new buildings and a podium parking structure. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the proposed Project will not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, impacts related to site drainage and erosion will be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact.

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a parking structure (hardscape). The Project will similarly occupy the entire Project Site with two new buildings and a podium parking structure. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding will be less than significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact.

A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system on Wilshire Boulevard.[161] Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Additional discussion of the construction and operation impacts is provided below.

Construction

The Project would require excavation for two subterranean levels and utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

The Project is required to comply with the LID Best Management Practices, which are determined on a case- by-case basis by the Department of Public Works. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project

[161] Navigate LA, Storm Drains Layer: http://navigatela.lacity.org/navigatela/.

design plans. Compliance with existing regulations would reduce the potential for construction water quality impacts to a less than significant level.

Operation

Activities associated with operation of the Project will not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing parking structure and developing a mixed-use project, the type of urban runoff would likely improve in quality. The parking for the Project would be located below grade in two subterranean levels and within the building on 4 levels. Therefore, the parking areas would not subject to rain that can create runoff. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

iv. impede or redirect flood flows?

No Impact.

This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project would not be located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.[162] Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based. The Site is not within a Flood Zone.[163] Therefore, no impact will occur.

d) Would the project, in flood hazard, tsunami, or seiches zones, risk release of pollutants due to project inundation

No Impact.

[162] Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[163] ZIMAS search: http://zimas.lacity.org/.

A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[164] The Project is located approximately 11 miles away from the Pacific Ocean and is not located within an area potentially impacted by a tsunami.[165]

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[166] The City's General Plan Safety Element has no areas around the Project Site identified as a bedrock or probable bedrock landslide area.[167] Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impacts related to tsunamis, seiches, and mudflow will occur.

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

Less Than Significant Impact.

Potential pollutants generated by the Project would be typical of residential and commercial land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Implementation of the LID measures on the Project Site would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans for Ballona Creek. In addition, with implementation of the Project's proposed landscaping, impervious surfaces would marginally decrease. The decrease in impervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

[164] Page II-16, Los Angeles General Plan Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.
[165] ZIMAs search: http://zimas.lacity.org/.
[166] ZIMAs search: http://zimas.lacity.org/.
[167] Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, March 6, 2019.

XI. Land Use And Planning

a) Would the project physically divide an established community?

Less Than Significant Impact.

A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site currently improved with a parking structure behind an existing office building that will remain. The Project's uses are compatible with the residential uses along Wilshire and the residential uses to the south, which are higher density multi-family units located in an urbanized area. Throughout the City and near the Project Site, there are similar residential uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. As such, impacts related to physical division of an established community will be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated.

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

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

recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (*Friends of Lagoon Valley*).

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

- City of Los Angeles General Plan
- Wilshire Community Plan
- ZI-2410 Metro Westside Subway Extension Project
- ZI-1117 MTA Project
- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2374 Los Angeles State Enterprise Zone
- ZI-1940 Wilshire Center/Koreatown Redevelopment Project and the Adaptive Reuse Incentive Area.
- Los Angeles Municipal Code

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[168] The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The Project Site is designated Regional Center Commercial.[169]

Regional Centers[170]

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Land Use Framework Element identifies the Project Site as Regional Center Commercial.

[168] California Government Code Section 65300.
[169] ZIMAS search: http://zimas.lacity.org
[170] General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm.

Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and wellbeing necessary for ensuring public nighttime use of transit facilities. They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services. Physically, the regional centers are generally characterized by three forms of development:

1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.

2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.

3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

Table B.11-1, General Plan Land Use, lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable policies of the General Plan for each land use (within a developer's control or developer focused).

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan (WCP), which was adopted in September 2001.[171] **Table B.11-2, Wilshire Community Plan**, sets forth the WCP's objectives for residential and commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals, objectives, and policies of the Wilshire Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

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

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). The Project would provide natural surveillance and transition zones due to the large glass windows and distinction between public space and private building.

ZI-2410 Metro Westside Subway Extension Project

Prior to the issuance of any building permit meeting the below criteria within an identified Metro Rail planning area (five hundred foot radius of future alignments), consultation with Metro is required.[172]

ZI-1117 MTA Project

Prior to the issuance of any building permit within 100 feet of the Metro Rail construction area, the Applicant shall obtain clearance from Metro.[173]

ZI-2452 Transit Priority Area in the City of Los Angeles

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

[171] Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf
[172] http://zimas.lacity.org/documents/zoneinfo/ZI2410.pdf
[173] http://zimas.lacity.org/documents/zoneinfo/ZI1117.pdf

2. The project is located on an infill site within a transit priority area.[174]

The Project contains multiple uses, including residential and commercial. The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[175] The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[176] The Project Site is within one block of the Metro Purple Line Western Park Station as well as multiple Metro and LADOT DASH lines.

ZI-2374 Los Angeles State Enterprise Zone

The Site is within an Enterprise Zone/Employment and Economic Incentive Program Area (EZ). The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZ special provisions applicable to plan check include parking standards and height.[177]

ZI-1940 Wilshire Center/Koreatown Redevelopment Project

On December 29, 2011, the California Supreme Court issued its decision in *California Redevelopment Association v. Matosantos*. The decision upheld recently enacted state law dissolving all California redevelopment agencies including the CRA/LA and made the dissolution of the agencies effective February 1, 2012. For purposes of this analysis, any references to the former CRA/LA are intended to mean the Designated Local Authority pursuant to changes in state law as discussed above. CRA is statutorily prohibited from entering any new agreements and is currently only allowed to wind down CRA affairs, including honoring existing obligations and addressing land use issues consistent with CRA's land use powers under the Redevelopment Plan. To date, the CRA has not transferred its land use powers to the Los Angeles Department of City Planning.

The Wilshire Center Redevelopment Plan sets forth an array of goals promoting business retention and expansion, attracting new businesses and developing public improvements.[178] The Project would promote the economic well-being of the area by increasing the tax revenue at the Site, redevelop the parking structure into a residential and commercial project. The Project would enhance the safety of the area by increasing the population and employees at the Site providing a natural surveillance around the Site into the night. The Project would add housing to the Site. The other objectives are for government policies and services.

Conclusion

[174] http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf.
[175] California Public Resources Code Section 21099(a)(4).
[176] California Public Resources Code Section 21099(a)(7).
[177] ZI-2374: http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf.
[178] http://www.crala.org/internet-site/Projects/Wilshire_Center/upload/WilshireCenter.pdf

SCAG 2016-2040 RTP/SCS recognizes that land uses authorized under the 2016-2040 RTP/SCS may be inconsistent with existing land use plans, policies, and regulations of an agency with jurisdiction over a project and identified mitigation measure MM-LU-1(b) (listed below) to address and avoid or reduce potential significant effects of such inconsistency to less than significant levels.

> MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine [the Lead Agency shall] if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

This mitigation measure permits a local agency to resolve the inconsistency between the general use designations under the SCAG 2016-2040 RTP/SCS and the adopted general plan with an amendment to the general plan and related zoning where the local agency finds that the environmental, social, economic, and engineering benefits of a project warrant a variance from the City's adopted general plan and zoning designations. Implementation of MM-LU-1(b) and approval by the City of a zone change would allow the Project to proceed in a manner consistent with both the 2016-2040 RPT/SCS and the City's General Plan land use designation and zoning for the Project Site.

The requested discretionary actions do not conflict with existing land uses in the area, and the Project would not introduce incompatible uses. The Project is consistent with the General Plan and the WCP goals, objectives and policies related to commercial use and urban design guidelines, to the extent feasible and applicable. Moreover, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project, therefore, considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site, based on detailed review of the relevant documents. As such, impacts would be less than significant.

Table B.11-1
General Plan Land Use

Goal, Objective, Policies	Discussion
Regional Centers	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	**Consistent.** The Project would create a mix of uses (residential and commercial) that provides jobs and culture, and serves the region.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**Consistent.** The Project would create a mix of uses that provides jobs and is served by the Metro Purple Line at a nearby station, which provides access to the greater region. The uses are compatible with other existing uses in the area.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans	**Consistent.** The Project would create a residential development that serves the region and is accessible due to the Metro Purple Line at a nearby stations. The commercial uses support the residential uses and also would be available to the public. Table 3-1 of General Plan Land Use policy 3.10.1 states that Regional Commercial typically includes eating and drinking establishments, retail/commercial, and commercial overnight accommodations, among other uses. The Project is consistent with this policy.
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	**Not Applicable.** A multi-modal transportation center is typically a location served by a variety of transportation agencies, types, services, and frequencies. The Project is an infill development on Wilshire Boulevard.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers. *Policy 3.16.1* Enhance pedestrian activity in areas designated as a Pedestrian-Oriented District ("-PD") by the design and siting of buildings in accordance with the policies contained in Chapter 5: Urban Form and Neighborhood Design. *Policy 3.16.2* Locate parking in pedestrian districts to the rear, above, or below the	**Consistent.** The Project is located along Wilshire Boulevard, which is a high pedestrian activity area. The Project includes ground-floor commercial uses and a design that enhances the pedestrian experience with glass storefronts and material and design changes on the upper levels to scale to pedestrians. Policy 3.16.1 is not applicable because the area is not designated –PD. The Project would comply with the standards of the Urban Design Chapter of the Community Plan. Policy 3.16.2 is applicable, and parking would be provided on-site in a

Goal, Objective, Policies	Discussion
street-fronting uses. *Policy 3.16.3* Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.	subterranean level consistent with this policy. Policy 3.16.3 is not applicable because the Project does not include ground level parking in a pedestrian oriented district. The new buildings do not front Wilshire. Parking would be in subterranean levels and within the building. However, while the ground level includes parking, it also includes retail along Harvard.
Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.	**Consistent.** The Project includes dedications along 7th and Harvard. The Project will provide new landscaping and street trees along both sidewalks.
Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	**Consistent.** The Project is an infill development with landscaping and trees along the ground level around the Site. The corner of Harvard and 7th includes a street dedication corner cut that will expand the sidewalk in this area..
Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	**Consistent.** The Project lighting would be standard for a residential and commercial building. Lighting will be designed and installed with shielding if necessary.
General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm and http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm Table: CAJA Environmental Services, April 2018.	

Table B.10-2
Wilshire Community Plan

Objective and Policies	Discussion
Residential	
Objective 1-1 Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.	**Consistent**. The Project provides residential uses with a variety of bedroom sizes.
Policy 1-1.1 Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.	**Consistent.** The Project includes development of mixed-use structures (residential units over commercial), similar in height and massing to other existing buildings along Wilshire Boulevard in the Project area. Additionally, no single-family/low-density residential neighborhoods are located near the Project Site.
Policy 1-1.2 Promote neighborhood preservation in all stable residential neighborhoods.	**Consistent.** The Project would promote neighborhood stabilization through infill development of the Project site with residential and commercial. None of the residential neighborhoods near the Project Site would be affected by the Project.
Policy 1-1.3 Provide for adequate Multiple Family residential development.	**Consistent.** The Project includes development of multi-family residential units, consistent with the land use designation for the Project site.
Policy 1-1.4 Provide for housing along mixed-use boulevards where appropriate.	**Consistent.** The Project includes development of multi-family residential units, consistent with the land use designation for the Project site.
Objective 1-2 Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	**Consistent**. The Project provides residential uses with a variety of bedroom sizes.
Policy 1-2.1 Encourage higher density residential uses near major public transportation centers.	**Consistent.** The Project includes development of 760 multi-family residential dwelling units and commercial uses, which is in proximity to several transit lines and within one block of the Metro Purple Line Normandie Station.
Objective 1-3 Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	**Not Applicable**. The Project Site does not contain existing residential uses.
Policy 1-3.1 Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.	**Consistent.** The Project site is located in a fairly densely developed area of the City. The visual character of the Project area is dominated by the mix of low-, mid-, and high-rise residential development. The scale of the proposed

Objective and Policies	Discussion
	buildings would be consistent with the scale of existing buildings along Wilshire Boulevard. The design, architecture, construction, and landscaping of the Project would comply with the City's design requirements for mixed-use buildings and the Project would be compatible with the existing residential land uses within the area.
Policy 1-3.2 Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.	**Consistent**. The construction of the new residential towers and parking garage would adversely impact but not materially impair the historic significance of original architectural design of the Travelers Building pursuant to CEQA, and therefore, the Project would not result in an overall significant adverse impact because the Travelers Building would remain an eligible historical resource pursuant to CEQA. ESA has concluded that the Travelers Building would remain eligible as a historical resource at the national, state, and local levels after Project completion and therefore the Project would result in a less than significant impact under CEQA.
Policy 1-3.3 Promote the preservation and rehabilitation of individual residential buildings of historic significance.	**Consistent**. The construction of the new residential towers and parking garage would adversely impact but not materially impair the historic significance of original architectural design of the Travelers Building pursuant to CEQA, and therefore, the Project would not result in an overall significant adverse impact because the Travelers Building would remain an eligible historical resource pursuant to CEQA. ESA has concluded that the Travelers Building would remain eligible as a historical resource at the national, state, and local levels after Project completion and therefore the Project would result in a less than significant impact under CEQA.
Policy 1-3.4 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.	**Not Applicable**. The Project Site would be on 7th Street, which contains a mix of residential, parking structure, and office uses.
Objective 1-4 Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.	**Not Applicable**. The Project is not required to provide affordable housing or increase accessibility for a specific population segment.
Policy 1-4.1 Promote greater individual choice in type, quality, price and location of housing.	**Consistent.** The Project includes development of 760 multi-family residential units (133 studios, 475 one-bedroom, and 152 two-bedroom units).
Policy 1.4-2 Ensure that new housing opportunities minimize displacement of residents.	**Consistent.** The Project site currently does not contain any residential development.

Objective and Policies	Discussion
Policy 1.4-3 Encourage multiple family residential and mixed use development in commercial zones.	**Consistent.** The Project would develop residential uses in a commercial C4 zone.
Commercial	
Objective 1 To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.	**Consistent**. The Project provides a mix of uses that would strengthen viable commercial development and provide new services within existing commercial areas. The Project will rehabilitate an existing historic commercial building and would also help to further activate Wilshire Boulevard.
Objective 2 To provide a range of commercial facilities at various locations to accommodate the shopping needs of residents and to provide increased employment opportunities within the community.	**Not Applicable**. The Project Applicant has no authority on other commercial developments.
Objective 3 To improve the compatibility between commercial and residential uses.	**Consistent**. Commercial and residential uses are compatible with each other.
Objective 2-1 Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a major street.
Policy 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.	**Consistent**. The Project includes commercial uses along 7th Street, could serve the residential uses to the south.
Policy 2-1.2 Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.	**Consistent**. The Project includes commercial uses along 7th Street, could serve the residential uses to the south. The commercial uses would be separate from any stand-alone residential development, which is located south of 7th Street.
Policy 2-1.3 Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.	**Consistent**. The Project would add residential uses which could support existing neighborhood stores and businesses.
Objective 2-2 Promote distinctive commercial districts and pedestrian-oriented areas.	**Consistent**. The Project includes commercial uses along 7th Street, could serve the residential uses to the south.
Policy 2-2.1 Encourage pedestrian-oriented design in designated areas and in new development	**Consistent**. The Project includes commercial uses along 7th Street, could serve the residential uses to the south.
Policy 2-2.2 Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community	**Consistent**. The Project includes commercial uses and open space deck on the parking structure to enhance the walkability of the area.

Objective and Policies	Discussion
meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.	
Policy 2-2.3 Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.	**Consistent**. The Project includes commercial uses on the 7th Street frontage that will activate the pedestrian experience.
Objective 2-3 Enhance the visual appearance and appeal of commercial districts.	**Consistent**. The Project would include two new contemporary buildings.
Policy 2-3.1 Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.	**Consistent**. The Project would include a new building, with landscape, wayfinding signage, and scaled to match similar buildings along Wilshire.
Source: Wilshire Community Plan, http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf Table: CAJA Environmental Services, April 2018.	

XII. 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.

A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[179] MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[180] Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas. The nearest one is #10 LA City Oil Field, located near 3rd Street and Alameda Street.[181] The California Department of Conservation has more detailed online mapping of wells. No oil wells exist on the Project Site.[182] Therefore, no impacts to mineral resources of regional or statewide significance will occur.

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.

A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site

[179] City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed March 6, 2019.
[180] City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed March 6, 2019.
[181] City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed March 6, 2019.
[182] California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx, March 6, 2019.

is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

XIII. Noise

The section is based in part on the following item, included as **Appendix I** of this SCEA:

I Noise Appendices, DKA Planning, December 2016.

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

Less Than Significant Impact with Mitigation Incorporated.

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. **Table B.13-1** provides examples of A-weighted noise levels from common sources.

Table B.13-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
Source: US OSHA, Noise and Hearing Conservation Technical Manual, 1999.	

Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m when background ambient noise levels are higher. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher

due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.

- Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Small perceptible changes in sound levels for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level for a hard surface of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, an unobstructed visual path between noise source and receptor. Barriers such as walls or buildings that break line-of-sight between sources and receivers can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA or more. However, if barriers are not high or long enough to break line-of-sight from sources to receivers, their effectiveness can be greatly reduced.

Regulatory Setting

Federal

Federal noise standards do not regulate environmental noise associated with short-term construction or long-term operation of development projects.

State

The State of California's 2003 General Plan Guidelines establish county and city guidelines for acceptable exterior noise levels based on land use. These standards and criteria are incorporated into the land-use planning process to reduce future noise and land-use incompatibilities. **Table B.13-2** illustrates State guidelines on considering the compatibilities between various land uses and outdoor noise levels.

Table B.13-2
Land Use Compatibility for Community Noise Environments

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
						CU		
Residential – Multi-Family	NA							
			CA					
					NU			
						CU		
Transient Lodging – Motels, Hotels	NA							
			CA					
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
			CA					
					NU			
							CU	
Auditoriums, Concert Halls, Amphitheaters								
	CA							
				CU				
Sports Arenas, Outdoor Spectator Sports								
	CA							
					CU			
Playgrounds, Neighborhood Parks	NA							
				NU				
						CU		
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
				NU				
								CU

Office Buildings, Business Commercial and Professional	NA							
				CA				
						NU		
Industrial, Manufacturing, Utilities, Agriculture	NA							
				CA				
						NU		

NA = 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.

CA = 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 system or air conditioning will normally suffice.

NU = 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.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Noise Control, Department of Health Services.

City of Los Angeles

Construction Noise Standards

The City of Los Angeles Municipal Code (LAMC) contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.*
>
> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
>
> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind*

upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other

sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a), below, would prevent Project HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

Existing Conditions

The Project site is surrounded by office, institutional, commercial, and residential land uses. Land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project site:

St. Basil Catholic Church - This church is located at 3611 Wilshire Boulevard, near the intersection of Wilshire Boulevard and S. Kingsley Drive. The receptor consists of a church and related facilities, including a rectory.

Azusa Pacific University and Bryan College - These educational uses are located within the office tower directly east of the Project site at 3580 Wilshire Boulevard. Azusa Pacific University facilities are located on the 2nd floor; Bryan College, the 4th Floor.

Wilshire Boulevard Temple—Glazer Family Campus - This religious campus is located at 3663 Wilshire Boulevard. It occupies the entire city block bound by Wilshire Boulevard, Hobart Boulevard, S. Harvard Boulevard, and W. 6th Street. The receptor's specific noise-sensitive uses include a temple, various educational facilities, and a playground.

7th Street Residences - This receptor consists of multi-family residential land-uses located directly south of the Project site, along 7th Street.

DKA Planning took short-term noise readings at locations surrounding the Project site to determine these receptors' ambient noise conditions. For noise monitoring locations along Wilshire Boulevard near the intersections of S. Kingsley Drive and S. Harvard Avenue, ambient noise was primarily attributable to vehicle traffic along Wilshire Boulevard. Vehicle traffic from 7th Street was the primary source of noise at a monitoring location along that street. Ambient noise levels for all Project receptors are shown in **Table B.13-3** for reference.

Table B.13-3
Existing Ambient Noise Levels

Sensitive Receptor	Existing Ambient Noise Level (dBA L_{eq})
St. Basil Catholic Church	73.4
Azusa Pacific University and Bryan College	73.4
Wilshire Boulevard Temple	70.1
7th Street Residences	62.6
Source: DKA Planning, 2016.	

Emmaus Village Church, located at 691 Harvard Boulevard, could also be impacted by the Project's construction noises. However, a representative baseline ambient noise level for this receptor could not be measured. Noises from a construction site just north of this receptor currently elevate its ambient noise levels. Use of these current ambient noise levels for analysis would underestimate the Project's impacts at this receptor. As an alternative, an estimated baseline ambient noise level predicted by the Federal Highway Administration's TNM 2.5 noise modeling software was utilized to analyze the Project's construction noise impacts at Emmaus Village Church. Noise modeling analysis determined that existing ambient noise levels along southbound Harvard Boulevard, north of 8th Street, can reach 62.4 dBA L_{eq} during A.M. peak hours of traffic and 64.5 dBA L_{eq} during P.M. peak hours of traffic. These results are consistent with noise measurements taken along similar streets surrounding the Project area. For a conservative analysis, an ambient noise level of 62.4 dBA L_{eq} is used for evaluating the Project's construction noise impacts at Emmaus Village Church.

Construction Noise Impacts

The project will comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

The Project will comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, 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.

The Project is proposed to be developed over the course of two phases. During each phase, noise-generating construction activities could occur at the Project site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. Phase 1 would involve the demolition of the site's existing parking garage, grading for a section of the Project's proposed parking podium, and the subsequent construction of that structure. Construction of the south tower parking podium and high-rises in Phase 2 would require no further demolition or grading activities; activities would be limited to the construction of the west and south towers.

The following sections discuss the impacts that various construction activities would have on nearby noise-sensitive receptors. These activities were specifically analyzed for their potential to cause sustained and significant noise impacts. Overall, the Project's construction noise impact was found to be significant but mitigable to less than significant.

Demolition and Grading

Noises from demolition and grading activities are generally the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities would include excavators, dumpers, bulldozers, and front-end loaders. A drill rig, grader, and scraper would also be necessary.

Demolition and grading noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively for both phases' demolition and grading activities. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA.[183] Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils or demolished materials, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The impacts of other construction equipment and vehicles would be neither as loud nor as extensive over the duration of the Project's demolition and grading activities. The projected noise impacts from excavators and front-end loaders are shown in **Table B.13-4** and summarized below.

St. Basil Catholic Church - This receptor is not projected to experience any appreciable increase in noise as a result of the Project's demolition and grading activities. This is due in large part to its distance from the Project site, high existing noise levels along Wilshire Boulevard, and the shielding effect of the existing 22-story office building that would remain as part of the Project. This building would almost entirely obstruct line of sight noise travel between on-site

[183] Federal Highway Administration, Construction Noise Handbook, 2006.

construction activities and the receptor, attenuating construction noises to levels far below thresholds of significance.

Azusa Pacific University and Bryan College - These receptors are projected to experience noise levels of up to 78.0 dBA as a result of the Project's demolition and grading activities, an increase of 4.6 dBA over existing ambient noise conditions. This incremental noise level increase would not exceed the 5 dBA over ambient, which is an indicator of a noticeable increase that may evoke a community reaction.

Wilshire Boulevard Temple - Wilshire Boulevard Temple and other noise sensitive uses on its religious campus are projected to experience a noise level increase of 0.2 dBA as a result of the Project's demolition and grading activities. Existing buildings would also largely obstruct line of sight noise travel between this receptor and on-site demolition and grading activities.

Emmaus Village Church - This church is projected to experience noise levels of up to 76.4 dBA as a result of the Project's demolition and grading activities, an increase of 14.0 dBA over existing ambient noise conditions.

7th Street Residences - These residences are projected to experience noise levels of up to 74.8 dBA as a result of the Project's demolition and grading activities, an increase of 12.2 dBA over existing ambient noise conditions.

As discussed above, Emmaus Village Church and 7th Street Residences would experience noise increases in excess of 5 dBA. However, these noise increases could be reduced to below 5 dBA by the use of temporary noise barriers (see **NOI-MM-5** and **NOI-MM-6** and **Table B.12-7**, below). Additionally, though no residential receptors would be projected to experience construction noise levels above 75 dBA, construction equipment source noise levels for excavators and front-end loaders would exceed LAMC Section 112.05's 75 dBA limit for powered construction equipment operating within 500 feet of residential zones. This impact could also be reduced by the use of temporary noise barriers and other measures. As a result, the demolition and grading noise impacts of Phase 1 would be considered significant but mitigable. **Mitigation Measures NOI-MM-1** through **NOI-MM-4** would reduce the Project's contribution to off-site increases in noise levels and limit construction source noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, demolition and grading activities would necessitate an estimated 30 haul trips per day to export demolished materials and excavated soils from the Project site to regional landfills. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses. A 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let along augment their traffic to levels

capable of producing 5 dBA ambient noise increases. The proposed haul route would access U.S. Highway 101 via 7th Street and Western Avenue, busy roadways with high existing levels of traffic and related noises. As a result, off-site construction noise impacts related to hauling would be considered less than significant.

Table B.13-4
Demolition and Grading Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
St. Basil Catholic Church	330	52.8	73.4	73.4	<0.1
Azusa Pacific Univ. and Bryan College	70	76.2	73.4	78.0	4.6
Wilshire Boulevard Temple	380	56.5	70.1	70.3	0.2
Emmaus Village Church	70	76.2	62.4	76.4	14.0
7th Street Residences	85	74.5	62.6	74.8	12.2
Source: DKA Planning, 2016.					

Concrete Pouring

For large structures such as the Project, concrete pouring requires the use of diesel-powered pumping trucks to pump concrete from mixing vehicles to locations around a construction site for a variety of applications. These vehicles are typically permitted to operate from public rights of way, closer to receptors than construction activities that occur on-site and behind sound barriers installed along project property lines. For this reason, concrete pouring activities have an elevated potential to cause sustained and significant noise impacts at nearby receptors. Concrete pouring would occur during all Project phases for the construction of the Project's parking podium, south tower, and west tower. Concrete pumping trucks can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; concrete mixing trucks, 79 dBA.[184] The projected noise impacts from these vehicles are shown in **Table B.13-5** and summarized below.

St. Basil Catholic Church - This receptor is not projected to experience any appreciable increase in noise as a result of the Project's concrete pouring activities.

Azusa Pacific University and Bryan College - These receptors could experience noise levels of up to 77.9 dBA as a result of the Project's concrete pouring activities, an increase of 4.6 dBA over existing ambient noise conditions. T

[184] Ibid.

Wilshire Boulevard Temple - Wilshire Boulevard Temple and other noise sensitive uses on its religious campus could experience a noise level increase of 0.2 dBA as a result of the Project's concrete pouring activities.

Emmaus Village Church - This church could experience noise levels of up to 76.2 dBA as a result of the Project's concrete pouring activities, an increase of 13.8 dBA over existing ambient noise conditions.

7th Street Residences - These residences could experience noise levels of up to 76.2 dBA as a result of the Project's concrete pouring activities, an increase of 13.6 dBA over existing ambient noise conditions.

As discussed, the Project's concrete pouring activities could have a significant noise impact at Emmaus Village Church and 7th Street Residences. However, temporary noise barriers and setbacks would mitigate this noise impact to below levels of significance. Therefore, this impact would be considered significant but mitigable to less than significant.

Table B.13-5
Concrete Pouring Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
St. Basil Catholic Church	315	51.6	73.4	73.4	<0.1
Azusa Pacific Univ. and Bryan College	60	76.0	73.4	77.9	4.5
Wilshire Boulevard Temple	350	55.7	70.1	70.3	0.2
Emmaus Village Church	60	76.0	62.4	76.2	13.8
7th Street Residences	60	76.0	62.6	76.2	13.6
Source: DKA Planning, 2016.					

Mitigation Measures

The following mitigation measures are recommended to reduce the Project's construction noise impacts:

NOI-MM-1 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOI-MM-2 All construction areas for staging and warming-up equipment shall be located as far as feasible from Emmaus Village Church and 7th Street Residences.

NOI-MM-3 Portable noise sheds for smaller, noisy equipment such as air compressors, dewatering pumps, and generators shall be provided as feasible.

NOI-MM-4 Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected to obstruct line of sight noise travel from the Project site to Emmaus Village Church and 7th Street Residences.

NOI-MM-5 When operating along 7th Street, concrete pumping trucks and concrete mixing trucks shall be shielded by temporary sound barriers to obstruct line of sight noise travel between these vehicles and 7th Street Residences. These barriers shall be capable of attenuating noises from concrete pumping activities by at least 10 dBA. Additionally, these vehicles shall maintain a distance of no less than 65 feet from residences along 7th Street while operating simultaneously in tandem.

NOI-MM-6 When operating along Harvard Boulevard, concrete pumping trucks and concrete mixing trucks shall be shielded by temporary sound barriers to obstruct line of sight noise travel between these vehicles and Emmaus Village Church. These barriers shall be capable of attenuating noises from concrete pumping activities by at least 10 dBA. Additionally, these vehicles shall maintain a distance of no less than 65 feet from Emmaus Village Church while operating simultaneously in tandem.

Impacts After Mitigation

Demolition and Grading

As shown in **Table B.13-6**, implementation of **Mitigation Measures NOI-MM-1** through **NOI-MM-4** would minimize demolition and grading-related ambient noise level increases at Emmaus Village Church and 7th Street Residences. These measures would also reduce the Project's construction noises to below the LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones.

Table B.13-6
Demolition and Grading Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
St. Basil Catholic Church	330	49.8	73.4	73.4	<0.1
Azusa Pacific Univ. and Bryan College	70	73.2	73.4	76.3	2.9
Wilshire Boulevard Temple	380	53.5	70.1	70.2	0.1
Emmaus Village Church	70	63.2	62.4	65.8	3.4
7th Street Residences	85	61.5	62.6	65.1	2.5
Source: DKA Planning, 2016.					

Concrete Pouring

As shown in **Table B.13-7**, implementation of **Mitigation Measures NOI-MM-5** and **NOI-MM-6** would reduce the noise impacts of the Project's concrete pouring activities to below thresholds of significance. Ambient noise level increases at Emmaus Village Church and 7th Street Residences would not exceed 5 dBA.

Table 3.13-7
Concrete Pouring Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Emmaus Village Church	60	65.3	62.4	67.1	4.7
7th Street Residences	60	65.3	62.6	67.2	4.6
Source: DKA Planning, 2016.					

Operational Phase Noise Impacts

On-Site Noise Sources

During Project operations, the development would produce noise from both on- and off-site sources. The direct on-site sources would include the following:

Mechanical Equipment: Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL. Noises from pool pumping and filtering equipment are not likely to be audible at nearby receptors, as pools would be located on the rooftops of the two proposed residential towers.

Residential Land Uses: Noises from recurrent activities (e.g., conversation, consumer electronics) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to these types of noises.

Retail Uses: The Project's retail uses would be internal. Noises from their operations would be inaudible at off-site receptors. Periodic sources of noise, such as deliveries, would not be capable of creating sustained and significant noise impacts at nearby residential receptors. Loading areas would be internally located within the Project's parking garage along Kingsley Drive and Wilshire Boulevard.

Auto-Related Activities: The Project's existing use consists of a multi-level parking garage. Though the Project's parking garage would contain more parking spaces and have a higher level of vehicle activity than the existing garage, residential receptors along 7th Street could experience a decrease in auto-related noises (e.g., doors slamming, engines starting, alarms, etc.) as a result of the Project. This is because the Project's south tower would nearly entirely obstruct the line of sight travel of noise between the proposed parking garage and these receptors. Currently, the existing parking garage extends out to 7th Street. It contains no shielding or other features to attenuate its auto-related noises.

The impact potential of these on-site operational noise sources would be considered less than significant.

Off-Site Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its estimated 3,307 net new daily trips.[185] The noise impact of these vehicle trips was modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels in dBA along roadway segments. For this analysis, an existing year (2016) no project scenario was compared to an existing year (2016) with project scenario. **Table B.13-8** show the Project's projected contributions to ambient noise level increases along modeled roadway segments.

As no roadway segment would experience a noise increase of 3 dBA to or within its respective "Normally Unacceptable" or "Clearly Unacceptable" noise category, or a 5 dBA or greater noise increase overall, the Project's off-site operational noise impact would be considered less than significant.

Table B.13-8
Estimated Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2016)	With Project (2016)	Project Change	Significant Impact?
N/B Harvard Blvd., N of 8th St.	AM	61.9	62.1	0.2	No
	PM	63.6	63.7	0.1	No
S/B Harvard Blvd., N of 8th St.	AM	62.4	62.6	0.2	No
	PM	64.5	64.6	0.1	No
N/B Normandie Ave., S of 6th St.	AM	67.6	67.6	0.0	No
	PM	68.5	68.5	0.0	No
S/B Normandie Ave., S of 6th	AM	67.9	68.0	0.1	No

[185] Fehr and Peers, 3600 Wilshire Boulevard Project Transportation Analysis, November 2016.

Table B.13-8
Estimated Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2016)	With Project (2016)	Project Change	Significant Impact?
St.	PM	68.2	68.2	0.0	No
E/B 7th St., W of Irolo St.	AM	70.5	70.6	0.1	No
	PM	72.4	73.0	0.6	No
W/B 7th St., W of Irolo St.	AM	70.4	70.4	0.0	No
	PM	71.9	72.1	0.2	No
Source: DKA Planning, 2016.					

The majority of the Project's long-term noise impacts would come from traffic traveling to and from the Project. Thus, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's contribution to permanent off-site ambient noise level increases would be minimal. As shown in **Table B.13-9**, future increases in ambient noise levels would be marginal, with or without the addition of Project traffic. Roadside ambient noise levels would not increase by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. As a result, the Project's cumulative operational noise impact would be considered less than significant.

Table B.13-9
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2023)	With Project (2023)	Project Change	Significant Impact?
N/B Harvard Blvd., N of 8th St.	AM	62.4	62.6	0.2	No
	PM	64.2	64.3	0.1	No
S/B Harvard Blvd., N of 8th St.	AM	62.9	63.1	0.2	No
	PM	65.1	65.1	0.0	No
N/B Normandie Ave., S of 6th St.	AM	68.4	68.5	0.1	No
	PM	69.6	69.6	0.0	No
S/B Normandie Ave., S of 6th St.	AM	68.7	68.7	0.0	No
	PM	69.8	69.8	0.0	No
E/B 7th St., W of Irolo St.	AM	71.1	71.1	0,0	No
	PM	73.1	73.1	0.0	No
W/B 7th St., W of Irolo St.	AM	71.0	71.0	0.0	No
	PM	72.4	72.5	0.1	No

Table B.13-9
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2023)	With Project (2023)	Project Change	Significant Impact?
Source: DKA Planning, 2016.					

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

Less Than Significant Impact.

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Sources of vibration include trains, buses, and construction activities.

Vibration Definitions

Peak particle velocity (PPV) can be used to describe vibration impacts to both buildings and humans. PPV represents the maximum instantaneous peak of a vibration signal, and it is usually measured in inches per second.[186] Root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on vibration-sensitive land uses, such as hospitals and recording studios. RMS amplitude is defined as the average of the squared amplitude of a vibration signal. Decibel notation (VdB) is commonly used to measure RMS, as it compresses the range of numbers required to describe vibration.[187]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Ground-borne vibrations can also interfere with certain types of highly sensitive equipment or machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.[188] Most

[186] Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.
[187] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.
[188] Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.

perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Regulatory Settings

Federal

For the evaluation of construction-related vibration impacts, state standards set by the California Department of Transportation (Caltrans) are used given the absence of Federal, County, and City standards specific to construction activities.

State

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. **Table B.13-10** summarizes Caltran's vibration guidelines for building and structural damage.

City

The City of Los Angeles has not adopted any thresholds associated with building damage or land use disruption caused by ground-borne vibration.

Table B.13-10
Building Damage Vibration Thresholds

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013.		

Construction Vibration Impacts

As discussed earlier, construction of the Project would require equipment such as excavators and loaders. These types of heavy-duty vehicles can produce peak vibration velocities of up to 0.089 inches per second at a distance of 25 feet.[189] Auger drilling for piles can produce similar ground velocities. **Table B.13-11** shows the Project's projected construction vibration impacts at the nearest off-site structures. No receptor would experience potentially damaging levels of ground-borne vibration from the Project's construction activities. As a result, the Project's construction vibration impacts would be considered less than significant.

Table B.13-11
Vibration Velocities at Off-Site Sensitive Uses from Project Construction

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant ?
St. Basil Catholic Church	330	0.007	0.5	No
3580 Wilshire Blvd. Building and Parking Garage	70	0.032	0.5	No
Harvard Blvd. Buildings	70	0.032	0.5	No
7th Street Residences	85	0.026	0.5	No
Wilshire Boulevard Temple	380	0.006	0.25	No
Source: DKA Planning 2016.				

Operational Vibration Impacts

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. As previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibrations far below levels associated with human annoyance or land-use disruption. As a result, the Project's long-term vibration impacts would be considered less than significant.

c) For a proposed 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 proposed project expose people residing or working in the project area to excessive noise levels?

No Impact.

The Project is not located within the vicinity (i.e., five miles) of a private airstrip nor a public airport. The Project would not expose people to excessive noise levels related to the operation of a public airport. Santa Monica Municipal Airport is located 8 miles to the west. Los Angeles International Airport (LAX) is approximately 9 miles to the southwest. Hawthorne Municipal Airport (HHR) is approximately 9.5 miles to the south. Hollywood Burbank Airport (Bob Hope

[189] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Airport) is 10 miles to the north. Given the distance between the Project Site and the airports listed above, the Project would not have the potential to expose people working or residing in the Project area to excessive noise levels. Therefore, no impact would occur.

XIV. 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.

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

Construction Impacts

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

Operational Impacts

The Project Site is located in SCAG's City of Los Angeles Subregion. According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.[190] In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,091,039 persons[191], an increase of 81,846 persons.

According to SCAG's State-approved 2014 RHNA, the City of Los Angeles is in need of 82,002 housing units, an annual average of about 10,250 new dwelling units per year, for eight years.

Table B.14-1, Population, Households, and Employment in the City of Los Angeles, includes the 2017 (baseline) and 2023 (buildout year) population[192], households[193], and employment[194] values from SCAG's 2016-2040 RTP/SCS.

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

Table B.14-1
Population, Households, and Employment in the City of Los Angeles

Year	Population	Households	Employment
2017	3,981,911	1,390,645	1,780,710
2023	4,145,603	1,468,814	1,882,102
Projected Growth	+163,692	+78,169	+101,392
Population, housing, and employment calculated based on linear interpolation of 2017 and 2023 values. Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf. Table: CAJA Environmental Services, June 2018.			

Population generation is shown in **Table B.14-2** and employee generation is shown in **Table B.14-3**. It is estimated that the Project would have approximately 1,847 residents and 18 employees.

Table B.14-2
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Residential	760 DU	2.43 person / DU	1,847
		Proposed Population	**1,847**
Note: DU = dwelling unit Source: The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates. Table: CAJA Environnemental Services, June 2018.			

Table B.14-3
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Retail	6,359 sf	1 employee / 369 sf	18
		Proposed Employees	**18**
Note: sf = square feet Source: LAUSD 2016 Developer Fee Justification Study, March 2017. Table 14. Table: CAJA Environnemental Services, April 2018.			

[193] The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Households between 2012 (1,325,500) and 2040 (1,690,300) is projected to grow by 364,800 over the 28-year period, or 13,029 per year average.

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

The April 2018 unemployment rate is Los Angeles-Long Beach-Glendale area is approximately 4.0 percent.[195] Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs. Rather the jobs could be filled by workers already counted within the Los Angeles area.

The estimated 1,847 net new residents generated by the Project would represent approximately 1.1 percent of the population growth forecasted between 2017 and 2023. Therefore, the Project's residents would be well within SCAG's projection for the City of Los Angeles.

The Project's 760 new residential units would constitute up to approximately 1.0 percent of the housing growth forecasted between 2017 and 2023. Therefore, the Project's housing units would be well within SCAG's projection for the City of Los Angeles.

The Project's 18 new employees would constitute up to approximately 0.02 percent of the employee growth forecasted between 2017 and 2023. Therefore, the Project's 760 housing units would be well within SCAG's projection for the City of Los Angeles.

As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. The Housing Element has identified 4,019 sites (1,014.2 acres) in the Wilshire Community Plan Area as having housing capacity for 51,490 net units.[196] The Project Site does not currently provide housing but will add 760 housing units. The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[197] Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area. By developing new residential dwelling units, the Project would help to fulfill this demand.

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

b) 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 contain any housing. The Project does not represent a displacement of substantial numbers of existing people or housing. Therefore, no impact will occur.

[195] Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.
[196] City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.
[197] City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

XV. Public Services

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In City of Hayward v. Board of Trustee of California State University (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[198]

This section is based on the following items, included as **Appendix J** of this SCEA:

J-1 Los Angeles Police Department response, February 2, 2017.

J-2 Los Angeles Unified School District response, December 7, 2016.

J-3 Los Angeles Department of Recreation and Parks response, December 1, 2016.

J-4 Los Angeles Public Library response, June 1, 2017.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

i) Fire protection?

Less Than Significant Impact.

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary.

198 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.[199]

Regulations

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. The Fire Prevention and Protection Chapter (Chapter V, Article 7) of the LAMC, known as the Los Angeles Fire Code, sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires and life safety hazards, the elimination of fire and life safety hazards in any building or structure (including buildings under construction), the maintenance of fire protection equipment and systems, and the storage, use, and handling of hazardous materials.[200]

Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed under permit of the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project will comply with these requirements of the Fire Code, as applicable.

The LAMC addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in Section 57.507.3.1 of the LAMC, fire water flow requirements vary from 2,000 gallons per minute (gpm) in the Low Density Residential land use category to 12,000 gpm in the High Density Industrial and Commercial land use category, as shown in **Table B.15-1**. A

[199] http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

[200] Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project will install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in Section 57.507.3.2 of the LAMC. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Section 57.512.1 of the LAMC provides that response distances, which are based on land use and fire flow requirements, shall comply with Table 57.507.3.3 of the LAMC. Based on such requirements, the maximum response distance for the Residential and Commercial land use category from fire stations with an engine company is 1.5 mile, and the maximum response distance from fire stations with a truck company is 2 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. In addition, as a skyscraper project, the structure is required to be equipped with sprinklers regardless of distance.

Table B.15-1
LAFD Fire Flow and Response Distance Requirements

Type of Land Development	Fire Flow	Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
High Density Residential and Neighborhood Commercial	4,000 gpm from four adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously	1 mile	1.5 miles
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required).	0.75 mile	1 mile

Notes: gpm = gallons per minute
Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles.
The maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied.
Source: Los Angeles Fire Code, Table 57.507.3.3,

Existing Stations

Pursuant to Table 507.3.3, the maximum response distance between commercial land use and a LAFD station that houses an engine company[201] is 1.0 mile and a station that houses a truck company[202] is 1.5 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.[203]

The Project Site is served by several fire stations, as shown in **Table B.15-2, Fire Stations**.

Table B.15-2
Fire Stations

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
29	4029 W. Wilshire	3,500 feet	Task Force Paramedic Rescue BLS Rescue Ambulance Decon Tender	EMS: 5:04 min Non-EMS: 4 :40 min	EMS: 4,482 Non-EMS: 1,090
13	2401 W. Pico	1.75 miles	Engine Paramedic Rescue EMS Battalion Captain	EMS: 4:52 min Non-EMS: 4:50 min	EMS: 5,260 Non-EMS: 983

Incident counts: year 2017 (January to December). Non-EMS is fire emergency. EMS is emergency medical service.

Response Time: year 2017 (January to December) average time (turnout time + travel time) in the station area.

Response time listed above does not include call processing, which averages 1:04 minutes citywide in 2017. Call processing is done at a central location and does not differ by fire stations.

Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their personal protective equipment and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.

Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.

Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.

http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf

Task Force: Truck company and two fire engines.

LAFD April 2016 Fire Station Directory.

Table: CAJA Environmental Services, April 2018.

Response Distance

The Project Site is located within the response distance specified by Table 507.3.3 of the 2014 Fire Code. Station No. 29 is within 1 mile away and contains a Task Force (truck company and

[201] LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: http://lafd.org/about/apparatus.

[202] LAFD: Aerial Ladder Fire Engines: http://lafd.org/about/apparatus.

[203] http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

engine company)[204] and additional engine and ambulance, respectively. Additionally, the Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby.

Construction Impacts

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As construction activities are temporary in nature and emergency vehicles have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel and/or driving in opposing traffic lanes, construction of the Project would not impact LAFD services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives during construction of the Project.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The routes from the fire stations to the Project Site would likely pass through several of the study intersections. The future traffic conditions with the Project show that none of the 17 traffic intersections would have a significant impact after mitigation.[205]

The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access will be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch

[204] LAFD: http://www.lafd.org/about/about-lafd/apparatus.
[205] Transportation Impact Analysis, Fehr & Peers, January 2017.

is to remain in the water system while the required gpm is flowing. The fire flow is set at 6,000 to 9,000 gpm. The following fire hydrants are the nearest to the Project Site:[206]

- Hydrant (ID 9694, size 2 ½ x 4D, 30-inch main) on southeast corner of Wilshire and Harvard.
- Hydrant (ID 9707, size 2 ½ x 4D, 8-inch main) on southwest corner of Wilshire and Kingsley.
- Hydrant (ID 9706, size 2 ½ x 4D, 8-inch main) on west side of Kingsley Drive, 345 feet south of Wilshire.
- Hydrant (ID 16002, size 2 ½ x 4D, 6-inch main) on northwest corner of 7th Street and Harvard.

Upgrades to the hydrants and system will be evaluated at the plan check phase as is standard City practice. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the Project area is sufficient as is standard practice. If it is not, then upgrades to the existing infrastructure may be required. No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site.

The Project will comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access. Those recommendations will be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. This will allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

ii) Police protection?

Less Than Significant Impact.

A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire.[207] The Olympic Community Police Station, located at 1130 South Vermont, is approximately 1.5 miles driving distance from the Project Site. The Olympic Community is 6.2 square miles in size, has

[206] Navigate LA, Fire Hydrants Layer: http://navigatela.lacity.org/navigatela/.
[207] LAPD, West Bureau: http://www.lapdonline.org/west_bureau

approximately 200,000 residents, and has approximate 235 sworn officers.[208] The officer to resident ratio is 1:851.

Each community police station is broken down into approximately one dozen smaller Reporting Districts (RD) that consist of a few blocks. The Project is within RD 2033, which is bound by Wilshire to the north, San Marino to the south, Western to the west, and Harvard to the east.[209]

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call.

Crime Rate

Crime statistics (Part 1 violent and property crimes) are shown in **Table B.15-3, Crime Statistics**. The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD to some extent.

Table B.15-3
Crime Statistics

Type of Crime	Olympic	Citywide
Homicide	6	228
Rape	69	1,346
Robbery	473	8,407
Aggravated Assault	597	15,068
Burglary	409	11,625
Motor Vehicle Theft	635	13,433
Burglary Theft from Vehicle	1,319	26,649

[208] Los Angeles Police Department response, February 2, 2017.
[209] http://assets.lapdonline.org/assets/pdf/bwOLYM%20STREET%20MAP.pdf

Table B.15-3
Crime Statistics

Type of Crime	Olympic	Citywide
Personal/Other Theft	1,455	29,782
Total (Part 1 Crimes)	**4,963**	**106,538**
Crimes Per 1,000 Persons	**248**	**266**
Year-to-date: November 16, 2019 Olympic: http://assets.lapdonline.org/assets/pdf/olyprof.pdf Citywide: http://assets.lapdonline.org/assets/pdf/cityprof.pdf Table: CAJA Environmental Services, November 2019.		

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open on the 7th Street, Harvard, and Kingsley and the area in front of the existing office building. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts on police protection services would be less than significant.

Operational Impacts

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours due to the residential uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors. The potential for crime can be reduced with site-specific designs and features. The Project will include standard security measures such as adequate security lighting, secure key access to residential areas, and residential lobby and leasing area that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade levels and as part of the building.

The LAPD will require that the commanding officer of the Community Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

The current approximate ratio of residents to officers is approximately 861 residents to officer.[210] The addition of the Project's 1,847 residents would equate to 2 officers.[211] 2 officers represents approximately 0.85 percent increase compared to existing staffing levels. This change is not substantial and the Project will contribute sales and property tax revenue into the City's General Fund, which can be used to fund additional resources per the planning and deployment strategies of the LAPD. The Project will not require the construction of a new or expanded police station. Impacts associated with police services would be less than significant.

iii) Schools?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:[212]

- RFK (Robert F. Kennedy) School Choice Area:[213]
    - Ambassador School, 3201 W. 8th Street for Elementary (K-5), includes Global Education in Korean and Spanish.
    - UCLA Community School, 700 S. Mariposa Avenue for Elementary (K-5).
    - New Open World, 3201 W. 8th Street for Elementary (K-5), Middle (6-8), and High (9-12).
    - Los Angeles High School of the Arts, 701 S. Catalina Street for High (9-12), includes Global Leadership, Visual Arts and Humanities.

Enrollment Capacities

Each of the schools' enrollments and capacities are shown in **Table B.15-4**. There are no anticipated new schools planned for the area.

[210] 200,000 / 235 = 861.
[211] 1,847 / 861 = 2
[212] LAUSD School Finder: http://rsi.lausd.net/ResidentSchoolIdentifier/.
[213] Schools & programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries.

Table B.15-4
LAUSD Schools Enrollments and Capacities

Name	Current Capacity [1]	Resident Enrollment [2]	Actual Enrollment [3]	Current Overage/ (Shortage) [4]	Overcrowded Now? [5]	Projected Capacity [6]	Projected Enrollment [7]	Future Overage/ (Shortage) [8]	Overcrowding Future? [9]
RFK Zone of Choice	4,591	4,495	4,000	96	No	4,268	4,484	(216)	Yes

Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2015-2016. Current and projected data are updated annually and become available after May 1st of each calendar.

[1]School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

[2] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students. -Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities. – A goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

[3] The number of students actually attending the school now, including magnet students.

[4] Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

[5] Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist: -A school is currently on a multi-track calendar. -There is currently a seating shortage. -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats.

[6] School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity for magnet programs.

[7] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

[8] Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment).

[9] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist: -A school remains on a multi-track calendar. -There is a seating shortage in the future. -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

^Current capacity shown for QEIA (Quality Education Investment Act) schools includes class-size reduction due to QEIA. Excludes capacity used by charter co-locations. Projected capacity excludes class-size reduction due to QEIA.

Table B.15-4
LAUSD Schools Enrollments and Capacities

Name	Current Capacity [1]	Resident Enrollment [2]	Actual Enrollment [3]	Current Overage/ (Shortage) [4]	Overcrowded Now? [5]	Projected Capacity [6]	Projected Enrollment [7]	Future Overage/ (Shortage) [8]	Overcrowding Future? [9]
Source: Written response from Rena Perez, LAUSD, December 7, 2016. Included in the Appendices. Table by CAJA Environmental Services, April 2018.									

Enrollment Generation

As shown on **Table B.15-5**, the Project (directly through the residential use and indirectly through its employees) would generate an increase of approximately 174 elementary, 47 middle, and 99 high school students, for a total increase of approximately 320 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table B.15-5
Project Estimated Student Generation

Project		Students Generated			
Source	**Quantity**	**Elementary**	**Middle**	**High**	**Total**
Residential units	760	172	46	98	316
Employees	6,359	2	1	1	4
Total		**174**	**47**	**99**	**320**

The generation factor is from the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.
Students per household: 0.2269 elementary, 0.0611 middle; 0.1296 high school. Students per 1,000 sf: 0.610 for neighborhood shopping centers, 0.254 for lodging.
Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 54.3 percent for elementary, 14.6 percent for middle, and 31.0 percent for high school.
Table: CAJA Environmental Services, June 2018.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.

iv) Parks?

Less Than Significant Impact.

A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The Wilshire Community Plan Area has a ratio of 0.23 acres or parkland per 1,000 persons.[214]

Table B.15-6, Parks and Recreation Centers, lists the parks and recreation centers that are located nearby the Project Site. While the 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 parks will be sited within half mile from the Project Site. [215]

Table B.15-6
Parks and Recreation Centers

Name	Address	Acres
Neighborhood Park (between one and 10 acres and with one mile radius of the Site)		
Seoul International Park	3250 West San Marino Avenue	3.47

[214] Los Angeles Department of Recreation and Parks response, December 1, 2016.
[215] Los Angeles Department of Recreation and Parks response, December 1, 2016.

Shatto Recreation Center	3191 West 4th Street	5.45
Community Park (between 10 and 50 acres and with two mile radius of the Site)		
MacArthur Park	2230 West 6th Street	29.87
NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm Los Angeles Department of Recreation and Parks response, December 1, 2016. Table: CAJA Environmental Services, April 2018.		

The Project would increase the number of residents and employees at the Project Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include open space, a pool, an amenities deck and fitness center, and private open space and decks. The amount of open space required and provided is 79,800 square feet. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities.

According to the standards provided in the Public Recreation Plan, the 2,045 net new residents would require 8.18 acres to maintain the standard of four acres per 1,000 people. The City requires developers to dedicate parkland or pay applicable fees (such as dwelling unit construction tax) in lieu of parkland dedication.

In September 2016, the City adopted a new Park Fee Ordinance (Ordinance), which became effective on January 11, 2017. The aim of the Ordinance is to increase the opportunities for park space creation and expand the Quimby fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Ordinance amends LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17. The Ordinance increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees.

The Ordinance provides that any project that has acquired vested rights under LAMC Section 12.26-A,3 prior to the effective date of the Ordinance, and/or has an approved vesting tentative map pursuant to LAMC Section 17.15, the application for which has been deemed complete prior to the effect date of the Ordinance, shall not be subject to the park fees set forth in the Ordinance. The Project's entitlement applications and its vesting tentative map application were deemed complete by the Department of City Planning on November 2, 2016, prior to the Ordinance becoming effective on January 11, 2017. As such, the Project is not subject to the park fee provisions of the Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project's applications were deemed complete, summarized as follows.

The former LAMC Section 17.12, authorized under the Quimby Act, requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located. Alternately, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually.

Similar to the former LAMC Section 17.12 described above, the former LAMC Section 12.33 requires a developer of multiple residential uses, for which a zone change is required, to dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. These fees (also known as Finn fees), are subject to the same restrictions, conditions, exemptions, and credits under the former LAMC Section 17.12. In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. As provided in LAMC Section 21.10.3(b), if a developer has already paid Quimby/Finn fees and/or dedicated parkland or recreational facilities pursuant to LAMC Sections 17.12 or 12.33, the required Dwelling Unit Construction Tax is reduced accordingly.

As discussed above, a new Park Fee Ordinance became effective on January 11, 2017. However, as the Project's entitlement applications, including its vesting tentative tract map application, were deemed complete prior to this date, it is not subject to the new park fee provisions of the Ordinance and is, instead, subject to the LAMC provisions that were in effect when the Project's entitlement applications were deemed complete. LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a specified minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required and provides a total of 79,800 square feet of usable open space.

Thus, the Project would meet the LAMC's requirement for the provision of usable open space. LAMC Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses and permits the payment of an in-lieu fee. The Project would be required to pay the in-lieu fee prior to the issuance of a building permit. With the provided on-site and open space and payment of applicable fees, impacts would be less than significant

v) Other public facilities?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[216] On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. **Table B.15-7** describes the libraries that would serve the Project.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.[217,218,219] Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Table B.15-7
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes / Circulation	Current Service	Staff
De Neve	2820 West 6th Street	9,273	37,598 / 125,034	110,861	9.0
Memorial	4625 West Olympic Boulevard	10,578	38,930 / 134,767	45,615	9.0
Washington-Irving	4117 West Washington	12,269	41,361 / 109,740	41,072	9.5

[216] LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts.
[217] "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf.
[218] "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm.
[219] "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies", Carol Tenopir: http://www.clir.org/pubs/reports/pub120/contents.html.

Pico Union	1030 South Alvarado Street	12,500	46,281 / 145,005	41,457	10.5
Pio Pico	694 South Oxford Avenue	20,000	65,822 / 255,578	123,611	16.5
Wilshire	149 North St Andrews Place	6,258	33,532 / 104,782	109,529	9.5

Staffing is full-time equivalent.
Current Service – LA Times Mapping LA and branch library community boundaries.
The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.
Source: Los Angeles Public Library response, June 1, 2017.
Table: CAJA Environmental Services, April 2018.

XVI. 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.

A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents and employees at the Project Site. Employees and do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under **Section 15.iv. Parks**, above. As shown in **Table B.15-6,** there are two neighborhood parks and one community park nearby the Project Site.

As discussed above, a new Park Fee Ordinance became effective on January 11, 2017. However, as the Project's entitlement applications, including its vesting tentative tract map application, were deemed complete prior to this date, it is not subject to the new park fee provisions of the Ordinance and is, instead, subject to the LAMC provisions that were in effect when the Project's entitlement applications were deemed complete. LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a specified minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required and provides a total of 79,800 square feet of usable open space.

Thus, the Project would meet the LAMC's requirement for the provision of usable open space. LAMC Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses and permits the payment of an in-lieu fee. The Project would be required to pay the in-lieu fee prior to the issuance of a building permit. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact.

A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

XVII. Transportation

This section is based on the following items, included as **Appendix K** of this SCEA:

K-1 Transportation Impact Analysis, Fehr & Peers, January 2017.

K-2 Approval Letter, LADOT, March 2, 2017.

K-3 Construction Traffic Memo, Fehr & Peers, January 16, 2019.

K-4 Email from LADOT, LADOT, February 12, 2019.

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 Impact with Mitigation Incorporated.

A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Traffic Scenarios

Existing Conditions – The analysis of existing traffic conditions is intended to provide a basis for the remainder of the study. The existing conditions analysis includes a description of the transportation system serving the project site, existing traffic volumes, and an assessment of the operating conditions at the study analysis locations.

Existing plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under existing conditions with the addition of Project-generated traffic. The impacts of the proposed Project on existing traffic operating conditions were then identified.

Future Base (Year 2023) Conditions – Future traffic projections without the Project were developed for the year 2023. The objective of this analysis was to project future traffic growth and operating conditions that could be expected to result from regional growth, related projects, and transportation network changes in the vicinity of the Project Site by the year 2023.

Future (Year 2023) plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under future conditions with the addition of Project-generated traffic. The impacts of the proposed Project on future traffic operating conditions were then identified.

Study Locations

17 signalized intersections, two stop-controlled intersections, and two local street segments were selected for analysis in consultation with LADOT.

Signalized Intersections

The following 17 signalized intersections, illustrated in Figure 1 (in Transportation Impact Analysis, Fehr & Peers, January 2017, included in Appendix K-1), were identified in conjunction with LADOT to be analyzed as part of the scope of work for this Project:

1. Western Avenue & Wilshire Boulevard

2. Western Avenue & 8th Street

3. Harvard Boulevard & 6th Street

4. Harvard Boulevard & Wilshire Boulevard

5. Harvard Boulevard & 8th Street

6. Kingsley Drive & 6th Street

7. Kingsley Drive & Wilshire Boulevard

8. Normandie Avenue & 3rd Street

9. Normandie Avenue & 6th Street

10. Normandie Avenue & Wilshire Boulevard

11. Irolo Street & 7th Street

12. Irolo Street & 8th Street

13. Irolo Street & Olympic Boulevard

14. Vermont Avenue & Wilshire Boulevard

15. Vermont Avenue & 8th Street

16. Vermont Avenue & 6th Street

17. Virgil Avenue & Wilshire Boulevard

Unsignalized Analysis

The following two stop-controlled intersections were identified in conjunction with LADOT to be considered for signal warrant analyses:

A. Harvard Boulevard & 7th Street

B. Kingsley Drive & 7th Street

Segment Analysis

The following two segments were identified in conjunction with LADOT to be analyzed as part of the scope of work for this Project:

Segment A. Harvard Boulevard south of 7th Street

Segment B. Kingsley Drive south of 7th Street

Existing Street System

Major arterials serving the study area include Western Avenue, Normandie Avenue/Irolo Street, and Vermont Avenue in the north/south direction and 3rd Street, 6th Street, Wilshire Boulevard, 8th Street, and Olympic Boulevard in the east/west direction. Interstate 10 lies approximately two miles south of the site and US-101 lies approximately two miles north of the site. Each of these interstates provides regional access to and from the study area. The characteristics of the major roadways serving the study area are described below. The street descriptions include the designation of the roadway under the Mobility Plan 2035 (Los Angeles Department of Planning, General Plan Mobility Element) approved by the Los Angeles City Council in January 2016.

Freeways

Interstate 10 runs in an east/west direction and extends from the Pacific Ocean eastward through Los Angeles County and beyond. In the vicinity of the study area, the freeway provides four lanes in each direction plus auxiliary lanes. Ramps are provided at Western Avenue and Normandie Avenue.

US-101 runs in the southeast-northwest direction, extending from downtown Los Angeles through Hollywood and the San Fernando Valley and beyond. In the vicinity of the study area, the Hollywood freeway provides four lanes in each direction plus auxiliary lanes. Ramps are provided at Western Avenue, Santa Monica Boulevard, and Melrose Avenue.

East/West Street

3rd Street is designated as an Avenue II in the City of Los Angles' Mobility Plan 2035 and runs in the north of the project site with two travel lanes in each direction within the project study area. Parking is permitted along portions of the roadway on both sides of the street. Left-turn pockets are present at major intersections. 3rd Street is part of the Moderate Transit Enhanced Network and the pedestrian analysis segments.

6th Street is designated as an Avenue II and runs north of the project site with two travel lanes in each direction and with no on-street parking during peak hours. During non-peak hours,

parking is permitted on both sides of the street. Left-turn pockets are present at major intersections.

7th Street is designated as an Avenue II and runs south of the project site with one travel lane in each direction. Parking is permitted on both sides of the street and left-turn pockets are present at major intersections. Portions of 7th Street are part of the Neighborhood Enhanced Network and the pedestrian analysis segments.

8th Street is designated as an Avenue II and runs south of the project site with two travel lanes in each direction. Parking is generally permitted on both sides of the street and left-turn pockets are present at major intersections. A portion of 8th Street near the project site is part of the Neighborhood Enhanced Network and the pedestrian analysis segments.

Olympic Boulevard is designated as a Boulevard II and runs south of the project site with three travel lanes in each direction during peak hours and with two travel lanes in each direction during non-peak hours. Parking is permitted on both sides of the street only during non-peak hours. Left-turn pockets are present at major intersections. Olympic Boulevard is part of the Vehicle Enhanced Network and the pedestrian analysis segments.

Wilshire Boulevard is designated as an Avenue I and runs north of the project site with two travel lanes in each direction and turn pockets are major intersections. An additional travel lane in each direction provides dedicated right-of-way for bus-only lanes during peak hours. Parking is permitted on both sides of the street during non-peak periods. Wilshire Boulevard is part of the Tier 2 Bicycle Lane Network, the Comprehensive Transit Enhanced Network, and the pedestrian analysis segments.

North/South Streets

Harvard Boulevard is designated as a Collector Street and runs west of the project site. Parking is permitted on both sides of the street. In the study area, south of 4th Street, Harvard Boulevard is part of the Neighborhood Enhanced Network.

Irolo Street is designated as an Avenue III and runs east of the project site, south of Wilshire Boulevard, with one travel lane in each direction. Parking is permitted on both sides of the street. Irolo Street is part of the pedestrian analysis segments.

Kingsley Drive is designated as a Local Street and runs east of the project site. Parking is permitted on both sides of the street.

Normandie Avenue is designated as an Avenue III and runs east of the project site, north of Wilshire Boulevard with two southbound and one northbound travel lane during the AM peak period and one southbound and two northbound travel lanes during the PM peak period. Parking is prohibited along the east side of the street during the AM peak period and is prohibited along the west side of the street during the PM peak period. Left-turn pockets are

present at major intersections. In the study area, Normandie Avenue is part of the pedestrian analysis segments.

Western Avenue is designated as an Avenue II and runs west of the project site with two travel lanes in each direction. South of 6th Street, parking is generally only permitted on one side of the street. North of 6th Street, parking is permitted on both sides. Left-turn pockets are present at major intersections.

Vermont Avenue is designated as an Avenue I and runs east of the project site with three travel lanes in each direction during the AM and PM peak period, north of Wilshire. There are two travel lanes in each direction south of Wilshire. Parking is generally permitted on both sides of the street except during peak periods. Left-turn pockets are present at major intersections. In the study area, Vermont Avenue is part of the pedestrian analysis segments.

Virgil Avenue is designated as an Avenue II located east of the project site and runs north from Wilshire Boulevard. In the study area, Virgil Avenue provides two travel lanes in each direction with left-turn pockets at most major intersections. Virgil Avenue is part of the Bicycle Lane Network.

Existing Traffic Volumes

New weekday AM and PM peak hour turning movement counts were collected at the study intersections on Thursday, March 17, 2016 and Thursday, November 3, 2016. One count was collected on Tuesday, September 22, 2015. The existing weekday morning and afternoon peak hour volumes at the study intersections are provided in Appendix B and count sheets for these intersections are contained in Appendix C (in Transportation Impact Analysis, Fehr & Peers, January 2017, included in Appendix K-1). In February 2019, LAODT confirmed that the analysis was still valid based on the conservative cumulative project list and growth rate assumptions (included in Appendix K-4).

Level Of Service Methodology

A variety of standard methodologies are available to analyze Level of Service (LOS). According to Traffic Study Policies and Procedures (LADOT, August 2014), the analysis is required to use the Critical Movement Analysis (CMA) method of intersection capacity calculation (Transportation Research Board, 1980) to analyze signalized intersections in the City of Los Angeles. The V/C ratio is then used to find the corresponding LOS based on the definitions in **Table B.17-1**. Under the CMA methodology, a V/C ratio is generated for each study intersection based on factors such as the volume of traffic and the number of lanes providing for such vehicle movement and an LOS grade.

For the driveway analysis, the Highway Capacity Manual (HCM) (Transportation Research Board, 2010) methodology was used to analyze the delay. Under HCM methodology, delay is calculated in seconds and given an LOS grade, as shown in **Table B.17-2**.

The City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) system is a computer –based traffic signal control system that monitors traffic conditions and system performance to allow ATSAC operations to manage signal timing to improve traffic flow conditions. The Adaptive Traffic Control System (ATCS) is an enhancement to ATSAC and provides fully traffic-adaptive signal control based on real-time traffic conditions. All of the study intersections located in the City of Los Angeles are currently operating under the City's ATSAC system and ATCS control. ATSAC and ATCS provide improved operating conditions. Therefore, in accordance with City of Los Angeles procedures, a credit of 0.07 V/C reduction was applied at each intersection where ATSAC is implemented and an additional 0.03 V/C reduction was applied at each intersection where ATCS is implemented.

Table B.17-1
Level of Service Definitions for Intersections

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	> 0.60 – 0.70	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 0.70 – 0.80	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 0.80 – 0.90	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 0.90 – 1.00	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.00	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.
Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980. Source: Table 2A, Transportation Impact Analysis, Fehr & Peers, January 2017.		

Table 3.17-2
Level of Service Definition for Stop-Controlled Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10.0
B	> 10.0 ≤ 15.0
C	> 15.0 ≤ 25.0
D	> 25.0 ≤ 35.0
E	> 35.0 ≤ 50.0
F	> 50.0
Highway Capacity Manual, Transportation Research Board, 2010 Source: Table 2B, Transportation Impact Analysis, Fehr & Peers, January 2017.	

Existing Levels Of Service

Existing year traffic volumes were analyzed using the intersection capacity analysis methodology described above to determine the existing operating conditions at the study intersections. **Table B.17-3** summarizes the results of the analysis of the existing weekday morning and afternoon peak hour V/C ratio and corresponding LOS at each of the analyzed intersections. As indicated, all of the 17 signalized intersections analyzed for impacts operate at LOS D or better during both peak periods.

Table B.17-3
Existing Conditions Intersections Levels of Service

No.	Intersection	Peak Hour	Existing (2016)	
			V/C	LOS
1	Western Avenue and Wilshire Boulevard	AM	0.832	D
		PM	0.799	C
2	Western Avenue and 8th Street	AM	0.562	A
		PM	0.623	B
3	Harvard Boulevard and 6th Street	AM	0.457	A
		PM	0.607	A
4	Harvard Boulevard and Wilshire Boulevard	AM	0.513	A
		PM	0.579	A
5	Harvard Boulevard and 8th Street	AM	0.440	A
		PM	0.537	A
6	Kingsley Drive and 6th Street	AM	0.463	A
		PM	0.560	A
7	Kingsley Drive and Wilshire Boulevard	AM	0.555	A
		PM	0.595	A
8	Normandie Avenue and 3rd Street	AM	0.661	B
		PM	0.682	B
9	Normandie Avenue and 6th Street	AM	0.546	A
		PM	0.591	A
10	Normandie Avenue and Wilshire Boulevard	AM	0.634	C
		PM	0.685	C
11	Irolo Street and 7th Street	AM	0.522	B
		PM	0.563	C
12	Irolo Street and 8th Street	AM	0.701	D
		PM	0.706	D
13	Normandie Avenue and Olympic Boulevard	AM	0.637	B
		PM	0.767	C
14	Vermont Avenue and Olympic Boulevard	AM	0.850	D
		PM	0.804	D
15	Vermont Avenue and 8th Street	AM	0.648	B
		PM	0.659	B
16	Vermont Avenue and 6th Street	AM	0.675	B

		PM	0.643	B
17	Virgil Avenue and Wilshire Boulevard	AM PM	0.572 0.562	A A
Source: Table 3, Transportation Impact Analysis, Fehr & Peers, January 2017.				

Project Traffic

Current accepted methodologies, such as the Institute of Transportation Engineers (ITE) Trip Generation methodology, are primarily based on data collected at suburban, single-use, freestanding sites. These defining characteristics limit their applicability to mixed-use or multi-use development projects, such as the Project, which is in a high density walkable urban setting with frequent and nearby local and regional transit service. The land use mix, design features, and setting of the proposed project include characteristics that influence travel behavior differently from typical single-use suburban developments. In order to estimate the project's trip generation within the context of the urban setting, a Main Street analysis was conducted, as detailed in Appendix E (in *Transportation Impact Analysis, Fehr & Peers, January 2017)*. The project trip generation accounts for the mix of uses provided in the project, the dense urban setting in which it is located, and the level of transit service provided in the area.

Project Trip Generation

The MainStreet methodology as applied in this study starts by estimating the trip generation based on trip generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012) and then estimates reductions to account for trip internalization and external non-automobile trips. The MainStreet methodology estimates that the proposed Project would generate about 37 to 44% fewer trips than the unadjusted ITE data. Informed adjustments were made to the ITE trip generation based on the MainStreet analysis to account for the improved density and diversity of land uses, pedestrian and bicycle connectivity, and transit service in the future. Internal trip credits can be defined as a reduction that can be applied to the trip generation estimates for individual land uses to account for trips internal to the site. These are trips usually made via walking within the site. Reflective of the overall travel behavior characteristics of the land uses in the Wilshire corridor based on the Main Street analysis, a 15% internal credit was incorporated in the trip generation analysis. The MainStreet analysis indicated a 29 to 38% reduction in project trips due to transit, walk, and bicycle trips to the project site. Consistent with the City of Los Angeles' Traffic Study Policies and Procedures, which states that developments within 1/4-mile walking distance of a rail transit station or a Rapid Bus stop may qualify for up to a 15% transit credit, the trip generation estimates incorporate a 15% transit credit. An additional 10% walk/bike credit was also applied as reflective of conditions at the project site as identified through the MainStreet analysis.

Per LADOT's Traffic Study Policies and Procedures, Attachment I Policy on Pass-By Trips, pass-by credits were applied to portions of the development. A 50% pass-by credit was applied to the retail uses. Pass-by credits account for the patrons making an intermediate stop on the

way from an origin to a primary trip destination without a route diversion. These trips would be attracted from traffic passing the site on Wilshire Boulevard and other nearby streets.

Lastly, an existing credit was applied to the trip generation due to the internalization of the existing office uses with the new retail development. As the existing office building will remain on the property, be directly linked to the new retail and residential uses via a pedestrian courtyard, and share the parking supply with the new uses, the office space was included in the internalization analysis. With the new uses on site, approximately 69 daily trips, 7 trips (6 inbound/1 outbound) during the AM peak hour and 6 trips (1 inbound/5 outbound) during the PM peak hour were estimated to no longer enter or leave the site by vehicle. As such, these trips were subtracted from the Project's overall trip generation as an existing use credit.

As shown in **Table B.17-4**, the Project would generate an estimated net increase of 3,307 daily trips, including 249 trips (47 inbound/202 outbound) during the AM peak hour and 309 trips (202 inbound/107 outbound) during the PM peak hour.

Table B.17-4
Trip Generation [a]

Description	ITE Land Use	Rate	Daily Traffic	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Retail	820	1,000 sf	42.70	62%	38%	0.96	48%	52%	3.71
Residential Apartments	220	DU	6.65	20%	80%	0.51	65%	35%	0.62
Proposed Project									
Retail	820	6,359 sf	272	4	2	6	12	12	24
Less Internal Capture [b]		15%	(41)	(1)	0	(1)	(2)	(2)	(4)
Less Transit Credit [c]		15%	(35)	0	0	0	(2)	(2)	(4)
Less Walk/Bike Credit		10%	(19)	0	0	0	0	0	0
Less Pass-by [d]		50%	(88)	(1)	(1)	(2)	(4)	(4)	(8)
Net External			89	2	1	3	4	4	8
Residential Apartments [e]	230	760 du	5,054	78	310	388	306	165	471
Less Internal Capture [b]		15%	(758)	(12)	(47)	(59)	(46)	(25)	(71)
Less Transit Credit [c]		15%	(644)	(10)	(39)	(49)	(39)	(21)	(60)
Less Walk/Bike Credit		10%	(365)	(5)	(22)	(27)	(22)	(11)	(33)
Total Driveway			3,287	51	202	253	199	108	307
Total Project External Vehicle Trips			3,376	53	203	256	203	112	315
Existing Use Credit Office Space Internalization [e]			69	6	1	7	1	5	6
Total Driveway Trips			**7,080**	**362**	**296**	**658**	**352**	**417**	**769**
Net Incremental External Trips			**3,307**	**47**	**202**	**249**	**202**	**107**	**309**

Notes:
[a] Source: Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition, 2012

[b] Internal capture represents the percentage of trips between land uses that occur within the site. Main Street model calibration of base ITE rates reflecting project & site specific characteristics.
[c] The transit credit is based on LADOT's Traffic Study Policies and Procedures, August 2014. The guidelines state that up to 25% transit credit may be taken for projects adjacent to a transit station or Rapid Bus stop.
[d] The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, August 2014.
[e] The residential apartment trip generation rate is higher thank the condominium rates for daily, AM, and PM peak hours; therefore, the units may be either both apartments or condominiums.
[f] The addition of the project land uses on site creates internalization opportunities with the existing office space where these trips were otherwise necessary. The office space internalization credit accounts for these trips no long leaving the site with the project.
Source: Table 4, Transportation Impact Analysis, Fehr & Peers, January 2017.

Project Traffic Distribution

The geographic distribution of trips generated by the proposed Project is dependent on characteristics of the street system serving the Project Site; the level of accessibility of routes to and from the Project Site; locations of employment and commercial centers to which residents of the project would be drawn; and residential areas from which the office employees and other commercial visitors would be drawn. A select zone analysis was conducted for the proposed uses using the City of Los Angeles' Travel Demand Model to inform the general distribution pattern for this study. The distribution of project trips is illustrated in Figure 5 (in *Transportation Impact Analysis, Fehr & Peers, January 2017)*.

Project Traffic Assignment

The traffic to be generated by the Project was assigned to the street network using the distribution pattern described in Figure 5 (in *Transportation Impact Analysis, Fehr & Peers, January 2017*). The assignment of traffic volumes took into consideration the locations of the proposed project driveways on Harvard Boulevard and Kingsley Drive.

Project Driveways

The Project Site currently is served by three driveways, one on Harvard Boulevard and two on Kingsley Drive. As discussed, with the Project, vehicular access will be provided by two driveways on Harvard Boulevard and two driveways on Kingsley Drive. All driveways will provide 2-way all-access to Harvard Boulevard and Kingsley Drive.

Existing Plus Project Traffic Conditions

The Project traffic estimated and assigned to the study intersections was added to the existing traffic volumes to estimate existing plus project traffic volumes. Turning movement traffic volumes for the Existing plus Project scenario are provided in Appendix B and Analysis sheets are provided in Appendix D (in *Transportation Impact Analysis, Fehr & Peers, January 2017)*.

Future Year 2023 Traffic Conditions

To evaluate the potential impacts of the proposed project on future (Year 2023) conditions, it was necessary to develop estimates of future traffic conditions in the area both without and with Project traffic. First, estimates of traffic growth were developed for the study area to forecast future conditions without the Project. These forecasts included traffic increases as a result of both regional ambient traffic growth and traffic generated by specific developments in the vicinity of the Project (related projects). These projected traffic volumes, identified herein as the Future Base conditions, represent the future conditions without the Project. The traffic generated by the proposed Project was then estimated and assigned to the surrounding street system. Project traffic was added to the Future Base conditions to form Future (year 2023) plus Project traffic conditions, which were analyzed to determine the incremental traffic impacts attributable to the Project itself.

Background Or Ambient Growth

Based on historic trends and at the direction of LADOT, it was established that an ambient growth factor of 1% per year should be applied to adjust the existing base year traffic volumes to reflect the effects of regional growth and development by year 2023. This adjustment was applied to the existing (year 2016) traffic volume data to reflect the effect of ambient growth by the year 2023.

Related Project Traffic Generation And Assignment

Future Base traffic forecasts include the effects of known specific projects, called related projects, expected to be implemented in the vicinity of the proposed project site prior to the buildout date of the Project. The list of related projects was prepared based on data from LADOT. A total of 75 cumulative projects were identified in the study area; these projects are listed in Table 5 and illustrated in Figure 6 (both in *Transportation Impact Analysis, Fehr & Peers, January 2017)*.

Transportation Infrastructure Projects

There are no infrastructure changes in the study area planned for implementation by year 2023 per confirmation by City staff. Therefore, network changes were not included in the analysis.

Future Year 2023 Base Traffic Volumes

Future Plus Project Traffic Projections

The Project traffic volumes were added to the year 2023 Future Base traffic projections, resulting in Future (year 2023) plus Project AM and PM peak hour traffic volumes. The Future (year 2023) plus Project scenario presents future traffic conditions with the completion of the Project.

Intersection Traffic Impact Analysis

The traffic impact analysis evaluates the projected LOS at each study intersection under the Existing plus Project and Future (year 2023) plus Project conditions to estimate the incremental increase in the V/C ratio caused by the proposed Project. This provides the information needed to assess the potential impact of the project using significance criteria established by LADOT.

Criteria For Determination Of Significant Traffic Impact

The City of Los Angeles has established threshold criteria to determine significant traffic impact of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio. **Table B.17-5** summarizes the impact criteria.

Table B.17-5
Significant Impact Criteria, City of Los Angeles

Intersection Conditions with Project Traffic		Significant Impact Threshold for Project-related Increase in V/C Ratio
LOS	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 and F	> 0.901	Equal to or greater than 0.010
Source: City of Los Angeles. Table by CAJA Environmental Services, April 2018.		

Existing Plus Project Impact Analysis

The existing plus project traffic volumes were analyzed to determine the projected V/C ratios and LOS for each of the analyzed intersections under this scenario. **Table B.17-6** summarizes the Existing plus Project LOS. All 17 signalized intersections are projected to operate at LOS D or better during both peak hours. After applying the aforementioned City of Los Angeles significant impact criteria, it is determined that the Project would not result in significant impacts under Existing plus Project conditions at any of the study intersections.

Table B.17-6
Existing + Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact
			V/C	LOS	V/C	LOS	V/C Increase	
1	Western Avenue and Wilshire Boulevard	AM	0.832	D	0.840	D	0.008	No
		PM	0.799	C	0.808	D	0.009	No

2	Western Avenue and 8th Street	AM	0.562	A	0.571	A	0.009	No
		PM	0.623	B	0.638	B	0.015	No
3	Harvard Boulevard and 6th Street	AM	0.457	A	0.465	A	0.008	No
		PM	0.607	A	0.625	B	0.018	No
4	Harvard Boulevard and Wilshire Boulevard	AM	0.513	A	0.537	A	0.024	No
		PM	0.579	A	0.625	B	0.046	No
5	Harvard Boulevard and 8th Street	AM	0.440	A	0.454	A	0.014	No
		PM	0.537	A	0.571	A	0.034	No
6	Kingsley Drive and 6th Street	AM	0.463	A	0.472	A	0.009	No
		PM	0.560	A	0.575	A	0.015	No
7	Kingsley Drive and Wilshire Boulevard	AM	0.555	A	0.581	A	0.026	No
		PM	0.595	A	0.636	B	0.041	No
8	Normandie Avenue and 3rd Street	AM	0.661	B	0.664	B	0.003	No
		PM	0.682	B	0.685	B	0.003	No
9	Normandie Avenue and 6th Street	AM	0.546	A	0.551	A	0.005	No
		PM	0.591	A	0.597	A	0.006	No
10	Normandie Avenue and Wilshire Boulevard	AM	0.634	C	0.647	B	0.013	No
		PM	0.685	C	0.704	C	0.019	No
11	Irolo Street and 7th Street	AM	0.522	B	0.525	A	0.003	No
		PM	0.563	C	0.577	A	0.014	No
12	Irolo Street and 8th Street	AM	0.701	D	0.704	C	0.003	No
		PM	0.706	D	0.714	C	0.008	No
13	Normandie Avenue and Olympic Boulevard	AM	0.637	B	0.639	B	0.002	No
		PM	0.767	C	0.771	C	0.004	No
14	Vermont Avenue and Olympic Boulevard	AM	0.850	D	0.858	D	0.008	No
		PM	0.804	D	0.813	D	0.009	No
15	Vermont Avenue and 8th Street	AM	0.648	B	0.650	B	0.002	No
		PM	0.659	B	0.662	B	0.003	No
16	Vermont Avenue and 6th Street	AM	0.675	B	0.679	B	0.004	No
		PM	0.643	B	0.645	B	0.002	No
17	Virgil Avenue and Wilshire Boulevard	AM	0.572	A	0.574	A	0.002	No
		PM	0.562	A	0.569	A	0.007	No
Source: Table 6, Transportation Impact Analysis, Fehr & Peers, January 2017.								

Future Plus Project Impact Analysis

The year 2023 Future Base peak hour traffic volumes were analyzed to determine the projected V/C ratio and LOS for each of the analyzed intersections. **Table B.16-7** summarizes the future LOS. Ten of the 17 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future Base conditions. The following five intersections are projected to operate at LOS E or worse during one or both of the peak hours under Future Base conditions:

1. Western Avenue & Wilshire Boulevard (LOS F during AM and LOS E during PM)

10. Normandie Avenue & Wilshire Boulevard (LOS C during AM and LOS E during PM)

12. Irolo Street & 8th Street (LOS E during AM and PM)

13. Normandie Avenue & Olympic Boulevard (LOS C during AM and LOS E during PM)

14. Vermont Avenue & Wilshire Boulevard (LOS F during AM and PM)

Future Plus Project Traffic Conditions

The resulting Future (year 2023) plus Project peak hour traffic volumes, were analyzed to determine the projected future operating conditions with the addition of the Project traffic. The results of the Future (year 2023) plus Project analysis are also presented in **Table B.17-7**. Ten of the 17 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future (year 2023) plus Project conditions. The following five intersections are projected to operate at LOS E or worse during one or both of the peak hours under Future (year 2023) plus Project conditions:

1. Western Avenue & Wilshire Boulevard (LOS F during AM and PM)

10. Normandie Avenue & Wilshire Boulevard (LOS C during AM and LOS E during PM)

12. Irolo Street & 8th Street (LOS E during AM and PM)

13. Normandie Avenue & Olympic Boulevard (LOS C during AM and LOS E during PM)

14. Vermont Avenue & Wilshire Boulevard (LOS F during AM and PM)

Future (Year 2023) Plus Project Intersection Impacts

As shown in **Table B.17-7**, using the criteria for determination of significant impacts, it is determined that the Project would result in significant impacts at four intersections under Future (year 2023) plus Project conditions:

7. Kingsley Drive & Wilshire Boulevard (PM peak hour)

10. Normandie Avenue & Wilshire Boulevard (PM peak hour)

12. Irolo Street & 8th Street (PM peak hour)

14. Vermont Avenue & Wilshire Boulevard (PM peak hour)

Table B.17-7
Future + Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Future		Future + Project			Significant Impact
			V/C	LOS	V/C	LOS	V/C Increase	
1	Western Avenue and Wilshire Boulevard	AM	1.012	F	1.021	F	0.009	No
		PM	0.999	E	1.008	F	0.009	No
2	Western Avenue and 8th Street	AM	0.727	C	0.734	C	0.007	No
		PM	0.856	D	0.871	D	0.015	No
3	Harvard Boulevard and 6th Street	AM	0.527	A	0.535	A	0.008	No
		PM	0.691	B	0.709	C	0.018	No
4	Harvard Boulevard and Wilshire Boulevard	AM	0.621	B	0.647	B	0.026	No
		PM	0.697	B	0.735	C	0.038	No
5	Harvard Boulevard and 8th Street	AM	0.554	A	0.568	A	0.014	No
		PM	0.709	C	0.743	C	0.034	No
6	Kingsley Drive and 6th Street	AM	0.561	A	0.569	A	0.008	No
		PM	0.648	B	0.663	B	0.015	No
7	Kingsley Drive and Wilshire Boulevard	AM	0.664	B	0.690	B	0.026	No
		PM	0.702	C	0.743	C	0.041	**Yes**
8	Normandie Avenue and 3rd Street	AM	0.755	C	0.757	C	0.002	No
		PM	0.776	C	0.779	C	0.003	No
9	Normandie Avenue and 6th Street	AM	0.679	B	0.683	B	0.004	No
		PM	0.679	B	0.685	B	0.006	No
10	Normandie Avenue and Wilshire Boulevard	AM	0.784	C	0.795	C	0.011	No
		PM	0.923	E	0.942	E	0.019	**Yes**
11	Irolo Street and 7th Street	AM	0.615	B	0.618	B	0.003	No
		PM	0.693	B	0.708	C	0.015	No
12	Irolo Street and 8th Street	AM	0.937	E	0.941	E	0.004	No
		PM	0.966	E	0.981	E	0.015	**Yes**
13	Normandie Avenue and Olympic Boulevard	AM	0.768	C	0.770	C	0.002	No
		PM	0.947	E	0.950	E	0.003	No
14	Vermont Avenue and Olympic Boulevard	AM	1.077	F	1.085	F	0.008	No
		PM	1.016	F	1.030	F	0.014	**Yes**
15	Vermont Avenue and 8th Street	AM	0.860	D	0.863	D	0.003	No
		PM	0.876	D	0.881	D	0.005	No
16	Vermont Avenue and 6th Street	AM	0.833	D	0.838	D	0.005	No
		PM	0.793	C	0.795	C	0.002	No
17	Virgil Avenue and Wilshire Boulevard	AM	0.711	C	0.712	C	0.001	No
		PM	0.713	C	0.720	C	0.007	No

Source: Table 7, Transportation Impact Analysis, Fehr & Peers, January 2017.

Unsignalized Intersection Signal Warrant Analysis

Two intersections near the project site are currently unsignalized, Harvard Boulevard & 7th Street and Kingsley Drive & 7th Street. The City of Los Angeles traffic analysis methodology and significance criteria are for signalized intersections only. The City does not provide impact thresholds for unsignalized intersections. Rather, Traffic Study Policies & Procedures states that "unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device."

Traffic volumes and lane configurations, were used to prepare the signal warrant analysis at the Harvard Boulevard & 7th Street and Kingsley Drive & 7th Street unsignalized intersections under Existing, Existing plus Project, Future Base, and Future plus Project conditions. As shown in **Table B.17-8**, the volumes at the Harvard Boulevard & 7th Street intersection met the signal warrant thresholds during the PM peak hour under all analysis scenarios. The volumes at the Kingsley Drive & 7th Street intersection met the signal warrant thresholds during the PM peak hour under all analysis scenarios, except existing conditions.

Should LADOT find that the City would prefer to install traffic signals at either of these locations, the project would be responsible for a fair share contribution to the costs of the signal installation.

Table B.17-8
Peak Hour Signal Warrant Analysis

No.	Intersection	Peak Hour	Signal Warrant Met?			
			Existing	Existing + Project	Future	Future + Project
A	Harvard and 7th	AM PM	No Yes	No Yes	No Yes	No Yes
B	Kingsley And 7th	AM PM	No No	No Yes	No Yes	No Yes
Source: Table 8, Transportation Impact Analysis, Fehr & Peers, January 2017.						

Mitigation Measures

The mitigation program has been developed in discussions with LADOT, which has approved the approaches, analysis methods, and assumptions used to complete this analysis. The mitigation program for the Project includes the following major components:

TRAN-MM-1 Transportation Demand Management Plan

A TDM program shall be implemented as part of the mitigation package for the Project. Several TDM program elements are project features proposed for implementation. Other TDM program elements would be developed in the preparation of a detailed TDM plan, to be approved by LADOT prior to approval

of a final certificate of occupancy for the Project. Several project design features would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile, including:

- Wide sidewalks
- Street trees along the perimeter
- Improved street and pedestrian lighting

Additional TDM program elements could include unbundled parking, rideshare programs and discounted transit passes, although the exact measures to be implemented will be determined when the plan is prepared, prior to the issuance of a final certificate of occupancy for the Project.

- Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. The research literature shows that unbundled parking costs can reduce VMT by up to 13% (CAPCOA, 2010).

- Rideshare Programs – Rideshare programs typically include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. The research literature shows that rideshare programs can reduce commuting VMT by up to 15% (CAPCOA, 2010).

- Transit Pass Discount Program – Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk, and therefore at a discounted rate. Discounted passes are then sold to interested residents or employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. The research literature shows that discounted transit passes can reduce commuting VMT by up to 20% (CAPCOA, 2010).

- Bicycle Parking and Bike Share Program – The Project will provide both long-term and short-term bicycle parking as well as bicycle showers and lockers for employees per the LAMC. In addition, the Project could provide complementary amenities such as a self-service bike repair area, and

potentially a bike share service among residents, employees and visitors of the site.

- Car Share Program – The Project could allow space for a car share service within its proposed parking facilities. A car share program is a model of car rental where people rent cars for short periods of time, often by the hour. The programs are attractive to customers who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.

- Upgrade to Transit Amenities – The Project, in conjunction with Metro and LADOT, could identify nearby bus-stops to upgrade stop locations to further encourage the use of transit in the area.

TRAN-MM-2 Signal Equipment Upgrades

The Project shall upgrade traffic signal CCTV equipment at the following study intersections:

9. Normandie Avenue & 6th Street

10. Normandie Avenue & Wilshire Boulevard

14. Vermont Avenue & Wilshire Boulevard

The Project shall also contribute to 50% of the costs for updating a fiber optic line along Wilshire Boulevard from Van Ness Avenue to Alexandria Avenue and on Normandie Avenue from 6th Street to Wilshire Boulevard.

Impacts After Mitigation

The TDM+ tool developed by Fehr & Peers was used to quantify the potential trip reduction for the Project due to implementation of these TDM measures. The TDM+ tool is based on research conducted by Fehr & Peers under contract to the California Air Pollution Control Officers Association (CAPCOA) and elsewhere. It considers a variety of TDM strategies and the setting in which they may apply, estimates effectiveness for each, and applies caps when appropriate (for example, simply aggregating the effectiveness of individual TDM measures can sometimes yield a result that is overblown since more than one measure may be targeting the same trip). With the TDM+ tool, it was estimated that a net overall reduction in trips of approximately 10% could be achieved. Upon discussion with LADOT, a 5% TDM credit was applied to the residential trip generation estimates for the Project. The mitigated trip generation estimate for the Project are presented in **Table B.17-9**.

These improvements will enhance LADOT's ability to monitor traffic flows and adjust signal timing adaptively, thus providing more efficient traffic flows and systemwide benefits. LADOT

has determined that the traffic system management improvements described above would increase intersection capacity in the system and that a 0.01 credit can be taken for the impacted intersections. **Table B.17-10** shows LOS and significant impact analysis results after implementation of the aforementioned mitigation measures under Existing and Future plus Project conditions. After applying the aforementioned mitigations, all intersections would no longer be impacted with the Project.

Table B.17-9
TDM Trip Generation [a]

Description	ITE Land Use	Rate	Daily Traffic	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project									
Retail	820	6,359 sf	272	4	2	6	12	12	24
Less Internal Capture [b]		15%	(41)	(1)	0	(1)	(2)	(2)	(4)
Less Transit Credit [c]		15%	(35)	0	0	0	(2)	(2)	(4)
Less Walk/Bike Credit		10%	(19)	0	0	0	0	0	0
Less Pass-by [d]		50%	(88)	(1)	(1)	(2)	(4)	(4)	(8)
Net External			89	2	1	3	4	4	8
Residential Apartments [e]	230	760 du	5,054	78	310	388	306	165	471
Less Internal Capture [b]		15%	(758)	(12)	(47)	(59)	(46)	(25)	(71)
Less Transit Credit [c]		15%	(644)	(10)	(39)	(49)	(39)	(21)	(60)
Less Walk/Bike Credit		10%	(365)	(5)	(22)	(27)	(22)	(11)	(33)
Less TDM Credit		5%	(164)	(3)	(10)	(13)	(10)	(5)	(15)
Total Driveway			3,123	48	192	240	189	103	192
Total Project External Vehicle Trips			3,212	50	203	243	193	107	300
Existing Use Credit Office Space Internalization [e]			69	6	1	7	1	5	6
Total Driveway Trips			**7,080**	**362**	**296**	**658**	**352**	**417**	**769**
Net Incremental External Trips			**3,143**	**44**	**202**	**236**	**192**	**102**	**294**

Notes:
[a] Source: Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition, 2012
[b] Internal capture represents the percentage of trips between land uses that occur within the site. Main Street model calibration of base ITE rates reflecting project & site specific characteristics.
[c] The transit credit is based on LADOT's Traffic Study Policies and Procedures, August 2014. The guidelines state that up to 25% transit credit may be taken for projects adjacent to a transit station or Rapid Bus stop.
[d] The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, August 2014.
[e] The residential apartment trip generation rate is higher thank the condominium rates for daily, AM, and PM peak hours; therefore, the units may be either both apartments or condominiums.
[f] The addition of the project land uses on site creates internalization opportunities with the existing office space where these trips were otherwise necessary. The office space internalization credit accounts for these trips no long leaving the site with the project.
Source: Table 9, Transportation Impact Analysis, Fehr & Peers, January 2017.

Table B.17-10

Future Year (2023) Plus Project Mitigations

No.	Intersection	Peak Hour	Future + Project			Significant Impact	With Mitigation			Residual Impact?
			V/C	LOS	V/C Increase		V/C	LOS	V/C Increase	
7	Kingsley Drive and Wilshire	AM	0.690	B	0.026	No	0.689	B	0.025	No
		PM	0.743	C	0.041	**Yes**	0.741	C	0.039	No
10	Normandie and Wilshire	AM	0.795	C	0.011	No	0.785	C	0.001	No
		PM	0.942	E	0.019	**Yes**	0.931	E	0.008	No
12	Irolo and 8th Street	AM	0.941	E	0.004	No	0.931	E	-0.006	No
		PM	0.981	E	0.015	**Yes**	0.970	E	0.004	No
14	Vermont and Olympic	AM	1.085	F	0.008	No	1.075	F	-0.002	No
		PM	1.030	F	0.014	**Yes**	1.019	F	0.003	No

Kingley Dr & Wilshire Blvd intersection was mitigated only by the 5% TDM credit without the need of the 1% intersection capacity reduction.

Source: Table 10, Transportation Impact Analysis, Fehr & Peers, January 2017.

Neighborhood Traffic Impact Analysis

This the results of an analysis conducted regarding the potential for Project impacts on local residential streets in neighborhoods near the Project. The analysis was conducted on two residential street segments to the south of 7th Street and the project site on Harvard Boulevard and Kingsley Drive. These streets were selected in conjunction with the City of Los Angeles, as they were determined to have a greater likelihood of neighborhood cut-through traffic from the Project. The significance of potential impacts was assessed using criteria established by the City of Los Angeles. 24-hour machine counts were conducted on the two analyzed street segments in March 2016. Future daily traffic volumes were projected in a manner similar to the peak hour analysis of the study intersections, including both ambient growth at 1% per year as well as anticipated traffic from cumulative projects that could be constructed by 2023. The net new project trips were assigned to the street network based on the project trip distribution pattern and were added to the Future Base projection to obtain Future plus Project projections.

Under the City of Los Angeles guidelines, a project impact on a local residential street would be considered significant if the new commercial trips generated by the project result in increases in average daily traffic (ADT) volumes as shown in **Table B.17-11**. Daily traffic volumes for the existing and projected future conditions are summarized in **Table B.17-12** and **B.17-13**. As shown, the Project would not result in a significant impact at any of the study neighborhood street segments.

Table B.17-11
Neighborhood Street Impacts

Projected ADT with Project (Final ADT)	Project-related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT

2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT
Table by CAJA Environmental Services, April 2018.	

Table B.17-12
Neighborhood Street Impact Analysis - Existing

Street Segment	Weekday Two-way Daily	With Project Impact Analysis				
	Existing Base	Commercial Project Only	Existing + Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Harvard south of 7th	7,494	22	7,516	0.3%	8%	No
Kingsley south of 7th	3,877	negligible	3,877	0.0%	8%	No
[a] Uses City of Los Angeles impact criteria for residential street segments. Source: Table 11, Transportation Impact Analysis, Fehr & Peers, January 2017.						

Table B.17-13
Neighborhood Street Impact Analysis - Cumulative

Street Segment	Weekday Two-way Daily		With Project Impact Analysis				
	Existing Base	Cumulative Base	Commercial Project Only	Cumulative + Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Harvard south of 7th	7,494	8,425	22	8,447	0.3%	8%	No
Kingsley south of 7th	3,877	4,343	negligible	4,343	0.0%	8%	No
[a] Uses City of Los Angeles impact criteria for residential street segments. Source: Table 12, Transportation Impact Analysis, Fehr & Peers, January 2017.							

Construction Impact[220]

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible.

Construction impacts are presented in **Table B.17-14**.

It should be noted, however, that SB 743 as implemented in California Public Resources Code Section 21099 provides that parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered

[220] As documented in the Traffic Study (January 2017), construction of the Project was anticipated to be constructed in three phases. The total duration of construction at the site was expected to take a total of approximately 72 months, or 6 years, to complete. The updated construction schedule is expected to take a total of 24 months, or two years, to complete. The South Tower and West Tower will be constructed concurrently, as opposed to separate phases previously.

significant impacts on the environment. The LAMC provides that construction activities are limited to the hours from 7:00 AM to 9:00 PM on weekdays and from 8:00 AM to 6:00 PM on Saturdays and holidays. No construction is permitted on Sundays.

Table B.17-14
Construction Impact Significance Factors

Significance Factor	Assessment	Conclusion
Temporary Traffic Impacts:		
The length of time of temporary street closures or closures of two or more traffic lanes;	Temporary street closures or closures of two or more traffic lanes are not anticipated.	Less than significant
The classification of the street (major arterial, state highway) affected;	The street affected by temporary parking lane or sidewalk closures (7th Street) is an Arterial II.	
The existing traffic levels and LOS on the affected street segments and intersections;	The Harvard/Wilshire and Kingsley/Wilshire intersections currently operates at LOS A during both peak periods. Harvard/Wilshire operates at LOS B during both peak periods under cumulative. Kingsley/Wilshire operates at LOS B (AM) and LOS C (PM) under cumulative.	
Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;	None of the affected streets directly lead to a freeway on-or off-ramp or other state highways.	
Potential safety issues involved with street or lane closures;	Worksite traffic control plans would be prepared for any temporary lane closures in accordance with applicable City and MUTCD guidelines.	
The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.	There are no emergency services located within the immediate vicinity of the affected streets.	
Temporary Loss of Access:		
The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;	Blockage of existing vehicle or pedestrian access to parcels fronting the construction area is not anticipated. Access to the office building and parking structure will remain throughout construction.	Less than significant
The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access;		
The type of land uses affected, and related safety, convenience, and/or economic issues.		
Temporary Loss of Bus Stops or Rerouting of Bus Lines:		
The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;	There are no bus stops along the 7th Street along the Project frontage. There is one bus lane on the south side of Wilshire Boulevard. As lane closures are not anticipated along Wilshire Boulevard, Project construction would not require blockage of the bus lane.	Less than significant
The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;		
The existence of other bus stops or routes with similar routes/ destinations within ¼ mile		

radius of the affected stops or routes;		
Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).		
Temporary Loss of On-Street Parking:		
The current utilization of existing on-street parking;	The Project could require temporary removal of on-street parking spaces along the Project frontage on 7th Street to accommodate temporary truck staging or travel lanes. Approximately 9 metered spaces would be removed for the entire duration of construction, 24 months. Public transit options are available within 1/4 mile of the Project site, including: Metro Purple Line Wilshire/Normandie Station and local bus routes on Wilshire, Irolo/Normandie, 3rd Street, 6th Street, 8th Street, and 9th Street.	Less than significant in accordance with SB 743/Public Resources Code Section 21099.
The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the project site;		
The length of time that existing parking spaces would be unavailable.		
Note: SB 743 as implemented in California PRC Section 21099 provides that parking impacts of a residential, mixed- use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Source: Table 15, Transportation Impact Analysis, Fehr & Peers, January 2017. Construction Traffic Memo, Fehr & Peers, January 16, 2019.		

Haul Trucks

Hauling activity is expected to occur during the first stage, mostly during demolition. Up to 341 haul trucks per day are anticipated on peak haul days. Hauling hours are anticipated to be 7:00 AM to 5:00 PM. The haul route for the Project will most likely be westbound on 7th Street, to northbound on Western Avenue, to the US-101 Freeway to the Scholl Canyon Landfill. Trucks are expected to be staged off-site and dispatched to the Project Site as needed.

Equipment and Delivery Trucks

In addition to haul trucks, the Site is expected to generate equipment and delivery trucks during each phase of construction. Minimal delivery/equipment trucks are expected to be needed under the demolition and site preparation stage of construction. Construction is expected to generate up to 79 equipment/delivery trucks per day on peak activity days.

Construction Employees

The number of construction workers would vary throughout the construction period with the construction stages generating the highest number of trips. The demolition and site preparation of the parking structure is expected to involve a total of 30 workers on site daily. The construction stage of the parking structure is expected to involve a total of 444 workers onsite daily. During the construction of the South and West Towers, a total of 444 workers are expected onsite daily on a peak day.

In order to accommodate the simultaneous construction of the South and West Tower, the existing parking structure will not be useable by the existing office tenants for the duration of the parking structure's construction, approximately six months.

During the parking structure's construction, the parking for existing office tenants is anticipated to be accommodated by the parking structures of properties within 750 feet of the Project (such as 3550 Wilshire Boulevard, 3660 Wilshire Boulevard, 3530 Wilshire Boulevard, 3545 Wilshire Boulevard, and 3699 Wilshire Boulevard) as may be permitted by the Los Angeles Department of Building and Safety until the new on-site parking structure is completed.

When the parking structure is completed, office employees and construction workers are anticipated to park in the new parking structure on site, pending approval from the Los Angeles Department of Building and Safety.

Temporary Traffic Impacts

Full-time closures to the parking lane are anticipated for the Project along the northern side of 7th Street. Parking is permitted on both sides of 7th Street. Since the closures during construction would be for the parking lane and not a travel lane, the temporary construction impacts on the roadway network would be considered less than significant. The sidewalks along Harvard Boulevard, Kingsley Drive, and Wilshire Boulevard fronting the Project construction site will be open during construction. However, the sidewalk on 7th Street will be closed for the duration of construction. The sidewalk on the south side of 7th Street will be open and pedestrians are anticipated to use this as a detour throughout construction. As such, the temporary impacts to pedestrians during construction would be less than significant. 7th Street is designated as an Avenue II with one travel lane in each direction. In addition, there are no emergency services in the immediate vicinity of the affected streets. The intersections of Harvard Boulevard & Wilshire Boulevard and Kingsley Drive & Wilshire Boulevard operate at LOS A during both peak hours under existing conditions, and would operate at LOS B or LOS C during the peak hours under cumulative conditions. Worksite traffic control plans would be prepared for any temporary vehicle lane, bicycle lane, or sidewalk closures in accordance with applicable City and MUTCD guidelines.

Temporary Loss Of Access

The existing office building located directly north of the construction site will remain open throughout construction. In addition, a portion of the parking garage will remain open during construction and will partially provide parking for both the office building tenants and the construction workers. The parking structure at 3550 Wilshire Boulevard will also provide supplemental parking supply throughout construction. Pedestrian and vehicular access to properties located to the east and west of the project site will be open and unobstructed for the duration of construction. During each phase of construction, access to the other phases of the Project will be maintained. Since the Project's construction would not block any vehicle or

pedestrian access to other parcels fronting the construction area, impacts would be less than significant.

Temporary Loss Of Bus Stops Or Rerouting Of Bus Lines

Bus stops are not located along 7th Street where the parking lane closures would occur. A bus-only lane is located on the south side of Wilshire Boulevard adjacent to the Project Site and a bus stop is present directly west of Harvard Boulevard, but construction will not affect bus operations as there are no bus stops on Wilshire Boulevard along the Project frontage, and closures along Wilshire Boulevard are not anticipated. Therefore, project construction would not require relocation of bus stops and the construction impacts on transit operations would be less than significant.

Temporary Loss Of On-Street Parking

With the parking lane closure on 7th Street from Harvard Boulevard to Kingsley Drive, construction would require temporary removal of on-street parking spaces to accommodate the construction area footprint and/or temporary truck staging. Nine metered parking spaces would be removed on 7th Street, potentially for the entire duration of construction, 72 months. Numerous public transit options are available within 1/4 mile of the project site. Also, per the provisions in the California Public Resources Code Section 21099, which implements SB 743, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. As such, temporary parking impacts would be less than significant.

Construction Period Trip Generation

Based on the aforementioned information, a construction period trip generation analysis was conducted for each phase of construction to estimate daily, morning and evening peak hour passenger car equivalent (PCE) trips. Construction workers often travel to and from a worksite outside of the typical peak commute hours. For the purpose of the analysis, it was assumed that up to 40% of the construction workers will arrive during the peak morning commute hour and 40% will depart during the peak evening commute hour. Haul and delivery/equipment trucks were assumed to occur evening throughout the 11-hour construction day. A PCE factor of 2.5 was assumed for haul trucks assuming the use of double-belly trailer trucks and a PCE factor of 2.0 was used for delivery trucks.

Tables B.17-15 and B.17-16 shows a summary of construction period trip generation under each phase of construction. As shown, the peak daily construction activity would occur during the demolition and site preparation of the parking garage construction. The peak construction activity during the peak hours would occur during the construction stage of the parking garage and construction of the south and west towers. The maximum daily trip generation of 1,765 daily PCE trips would occur during the demolition and site preparation phase. The maximum peak

hour trip generation of 206 PCE trips would occur during each of the morning and evening peak hours during the construction stage of the parking garage and south and west towers.

At any given time, the peak construction activity is estimated to generate fewer daily and peak hour trips than are projected for the Project once it is completed and occupied (3,307 daily trips, 249 AM peak hour trips, and 309 PM peak hour trips).

Although significant construction impacts are not anticipated, the influx of this material and equipment could create less than significant impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks will be needed for the parking garage and the buildings.

- Some of the materials and equipment could require the use of large trucks (18-wheelers), which could create additional congestion on the adjacent roadways.

- Delivery vehicles may need to park temporarily on adjacent roadways such as Harvard Boulevard, Kingsley Drive, and 7th Street as they deliver their items. Based on past experience, it is not uncommon for these types of deliveries to result in temporary lane closures.

With the updated construction phasing and schedule, the Project's parking plans during construction as well as projected construction trip generation have been updated. With the updated phasing, existing office workers would no longer be able to park in a portion of the parking structure during construction as disclosed in the Traffic Study, but rather would park in in nearby lots. This also applies to construction workers as well. Sufficient off-site parking is anticipated to be available for the existing office users and construction workers throughout construction. With regards to the construction trip generation, the updated trip generation would still generate less daily and peak hour trips than the Project 's trip generation. The construction impact analysis described in the Traffic Study which assesses project impacts would remain unchanged with the updated construction phasing and schedule. Therefore, with the updated construction information, the construction impact conclusion remains the same as disclosed in the Traffic Study, less than significant.

Table B.17-15
Peak Daily Activity

Phase	Demolition and Site Preparation	Construction
Garage Construction		
Construction Workers	30	444
PCE Factor	1.0	1.0
Haul Trucks	341	0
PCE Factor (Double-belly trailer)	2.5	2.5

Delivery/Equipment Trucks	0	79
PCE Factor (Super 10s)	2.0	2.0
South and West Tower		
Construction Workers	-	444
PCE Factor	-	1.0
Haul Trucks	-	0
PCE Factor (Double-belly trailer)	-	2.5
Delivery/Equipment Trucks	-	79
PCE Factor (Super 10s)	-	2.0
PCE - Passenger car equivalent Source: Table 18, Transportation Impact Analysis, Fehr & Peers, January 2017. Construction Traffic Memo, Fehr & Peers, January 16, 2019.		

Table B.17-16
Construction Period Trip Generation

Phase	Daily PCE Trips [1]	Morning Peak			Evening Peak		
		In	Out	Total	In	Out	Total
Garage Construction							
Demolition and Site Preparation							
Construction Worker trips [2]	60	12	0	12	0	12	12
Haul Truck Trips [3]	1,705	78	78	156	78	78	156
Delivery/Equipment Truck Trips [3]	0	0	0	0	0	0	0
Total	**1,765**	**90**	**78**	**168**	**78**	**90**	**168**
Construction							
Construction Worker trips [2]	888	178	0	178	0	178	178
Haul Truck Trips [3]	0	0	0	0	0	0	0
Delivery/Equipment Truck Trips [3]	316	14	14	28	14	14	28
Total	**1,204**	**192**	**14**	**206**	**14**	**192**	**206**
South Tower and West Tower							
Construction							
Construction Worker trips [2]	888	178	0	178	0	178	178
Haul Truck Trips [3]	0	0	0	0	0	0	0
Delivery/Equipment Truck Trips [3]	316	14	14	28	14	14	28
Total	**1,204**	**192**	**14**	**206**	**14**	**192**	**206**
PCE - Passenger car equivalent Notes: [1] - Daily trips were calculated by counting two trips, one inbound and one outbound trip for each vehicle [2] - Up to 40% of the construction workers were assumed to arrive during the morning peak hour of adjacent street traffic. A total of up to 40% worker were assumed to depart during the evening peak hour. [3] - Daily haul, delivery/equipment, and trash truck trips were assumed to occur evenly throughout an 11-hour construction day. Therefore, the daily truck trips were divided by 11 hours to calculate morning and evening peak hour truck trips.							

Source: Table 18, Transportation Impact Analysis, Fehr & Peers, January 2017.
Construction Traffic Memo, Fehr & Peers, January 16, 2019.

Construction Project Design Features

As shown in **Table B.17-14**, impacts related to construction traffic were found to be less than significant. In addition, the peak construction activity will generate fewer daily and peak hour trips than are projected for the Project once it is completed and occupied. While mitigation measures are not required to mitigate significant impacts, to be conservative a Construction Traffic Management Plan and Construction Worker Parking Plan should be implemented (see **TRAN-PDF-1**).

Project Design Features

TRAN-PDF-1 A Construction Traffic Management Plan will be developed by the contractor and approved by the City of Los Angeles to alleviate construction period impacts, which may include but is not limited to the following measures:

- Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the project site will be off 7th Street.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking lane and/or sidewalk closures are anticipated along 7th Street, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

A Construction Worker Parking Plan will also be developed by the contractor and approved by the City of Los Angeles to ensure that the parking location requirements for construction workers will be strictly enforced. These could include but are not limited to the following measures:

- During construction activities when construction worker parking cannot be accommodated on the project site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the project site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.

- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no parking is permitted on residential streets.

Conclusion

The LOS analysis for the Existing plus Project Scenario determined that the Project would not result in significant impacts at study area intersections. The LOS analysis for the Future plus Project scenario determined that the Project would result in significant impacts at 4 intersections. After mitigations (**TRAN-MM-1** and **TRAN-MM-2)**, all impacts would be fully mitigated.

LADOT Review and Approval

LADOT reviewed the traffic study and issued an approval letter on March 2, 2017 (included as Appendix J-2 to this SCEA). The results of the traffic analysis, which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community. The Project would follow the conditions of the approval letter.

Existing Public Transit Service

The Project site is served by a high level of public transit. Figure 3 (in Transportation Impact Analysis, Fehr & Peers, January 2017, included in Appendix J-1) shows the various metro bus routes, rapid bus routes, and Metro Rail lines providing service in the study area. The Project is located two blocks (approximately 700 feet) west of the Metro Purple Line Wilshire/Normandie Station. Six local Metro (Routes 16/17/316, 18, 20, 28, 66, 207), three Metro Rapid (Routes 720, 728, 757), one DASH (Wilshire Center/Koreatown), one Foothill Transit (Route 481), and one Commuter Express (Route 534) bus routes provide service within the study area. Wilshire Boulevard has east-west dedicated bus lanes.

Existing Bicycle And Pedestrian Facilities

Figure 4 (Transportation Impact Analysis, Fehr & Peers, January 2017, included in Appendix J-1) shows citywide designated bicycle facilities in the project area. Wilshire has peak hour bus lanes with bicycles permitted. Approximately 0.3 miles north of the Project Site, 4th Street is designated a Sharrowed Route and approximately 1/2 mile north of the project site, Oxford Avenue includes a bike lane. A portion of 7th Street, approximately 1/2 mile east of the Project Site, also includes a bike lane. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those which are more likely to be built by 2035. The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets containing bicycle facilities. The Mobility Plan 2035 identifies Wilshire Boulevard, 7th Street west of St. Andrews Place, and Virgil Avenue north of Wilshire Boulevard as part of the Tier 2 Bike Lane Network. Several roadways near the Project are designated as part of the Neighborhood Enhanced Network such as St. Andrews Place, Oxford Avenue, Harvard Boulevard, 4th Street, 7th Street, and 9th Street.

The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

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

Less Than Significant Impact.

This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. While Appendix G was revised to incorporate Section 15064.3, Section 15064.3 does not become applicable statewide until July 1, 2020. Until that time, pursuant to Section 15064.3(c), agencies are not required to use VMT as the basis for evaluation of traffic impacts and also may elect to use Section 15064.3 immediately.

The City adopted a VMT methodology on July 30, 2019. During this transition, projects that already have a signed memorandum of understanding (MOU) with LADOT and have filed an application with DCP may continue analyzing transportation impacts with level of service (LOS), as long as the project will be adopted and through any appeal period prior to the State deadline of July 1, 2020. Thus, at this time, traffic analyses within the City of Los Angeles continue to be based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project (consistent with Checklist Question XVII.b of the CEQA Guidelines prior to the latest update).

The MOU was filed in September 2016.

CEQA Guidelines Section 15064.3(b) states that "projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." The Project Site is within ½ mile of a major transit stop. Therefore, impacts would be less than significant.

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 with Mitigation Incorporated.

A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Proximity to Schools

The Project Site is in proximity to the following schools:[221]

- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 550 feet northwest of the Site's parking structure boundary.
- Kennedy Community Schools, 701 S. Catalina Street, 1,350 feet east of the Project Site.
- Smiling Tree Preschool, 611 Hobart Boulevard, 825 feet northwest of the Project Site.

The Project will have a less than significant impact during construction (with regulatory compliance for asbestos, lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that the development and operations does not emit hazardous materials. The schools would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site.

Driveways

The Project would have four driveways:

- Two full-access driveways on Harvard Boulevard
- Two full-access driveways on Kingsley Drive

[221] LAUSD and Google Maps.

The loading areas for the commercial uses will be located off Harvard Boulevard and the residential loading area will be located off Kingsley Drive.

An LOS analysis was conducted to evaluate the ability of the project access plan to accommodate the anticipated traffic levels at the driveway access points. The driveway locations below will be unsignalized and stop-controlled and were analyzed using the 2-way Stop methodology from the HCM. The HCM methodology determines the average vehicle delay for the stop-controlled approach to find the corresponding LOS. **Table B.17-17** shows the results of the LOS analysis at the unsignalized driveways.

The Project would provide a parking and driveway plan for review and approval by Los Angeles Department of Building and Safety.

Table B.17-17
Driveway Service and Impact Analysis

Driveway Location	Peak Hour	Existing + Project (2016)		Future + Project (2023)	
		Delay (seconds)	LOS	Delay (seconds)	LOS
Harvard Boulevard Northern Driveway	AM	12.4	B	12.7	B
	PM	17.5	C	18.5	C
Kingsley Drive Northern Driveway	AM	14.6	B	15.1	C
	PM	18.8	C	20.1	C
Kingsley Drive Southern Driveway	AM	14.1	B	14.6	B
	PM	17.8	C	19.0	C
Harvard Boulevard Southern Driveway	AM	12.0	B	12.5	B
	PM	16.3	C	17.6	C
Source: Table 13, Transportation Impact Analysis, Fehr & Peers, January 2017.					

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. The Project will comply with **Mitigation Measure TRAN-MM-3** to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be reduced to less than significant.

Pedestrian access to the Project would be provided at entrances along Harvard, 7th Street, and Kingsley, as well as from the parking structures within the building. The Project would not mix pedestrian and automobile traffic and, therefore, no pedestrian impacts would occur.

Other Hazards

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

Mitigation Measure

TRAN-MM-3 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.

- 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) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall 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 and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact.

A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD and LAPD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site. The Project would comply with LAFD and LAPD requirements and provide adequate access for emergency vehicles and service responses. The Project would ensure that adequate and safe access, including access for emergency vehicles, remains available. This would be accomplished through the Construction Traffic Management Plan (listed as **TRAN-PDF-1**). Impacts related to emergency access would be less than significant.

XVIII. Tribal Cultural Resources

The section is based, in part, on the following item, included as **Appendix L** of this SCEA:

L Tribal Cultural Resources Assessment, SWCA, September 2018.

Would the project:

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

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

Less Than Significant Impact.

ESA recommends that the building be considered a historical resources pursuant to CEQA and that the building be assigned a California Historic Resource (CHR) Status Code of 3CS and 5S3, noting it as eligible for listing in the National Register of Historic Places as California Register of Historical Resources as well as local designation, through survey evaluation. The building is considered a historical resource pursuant to CEQA, therefore ESA analyzed direct and indirect impacts to historical resources that may result from the Project. Although, the Project would have a less than significant impact under CEQA, the Project would not entirely conform to the Secretary of the Interior's Standards because of the removal of contributing (secondary) character-defining features (Garage and associated landscaping). The construction of the new residential towers and parking garage would adversely impact but not materially impair the historic significance of original architectural design of the Travelers Building pursuant to CEQA, and therefore, the Project would not result in an overall significant adverse impact because the Travelers Building would remain an eligible historical resource pursuant to CEQA. ESA has concluded that the Travelers Building would remain eligible as a historical resource at the national, state, and local levels after Project completion and therefore the Project would result in a less than significant impact under CEQA.[222]

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1,

[222] Historic Resource Assessment, ESA, October 2018.

the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact.

Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an SCEA or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that 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. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

SWCA conducted a California Historical Resources Information System (CHRIS) search for the Project area plus a 0.5-mile (0.8-km) radius on March 14, 2018, at the South Central Coastal Information System (SCCIC) located at California State University, Fullerton.

On November 21, 2016, CAJA Environmental Services received the results of a Sacred Lands File (SLF) search from the NAHC. The NAHC letter indicated that there are no sacred sites in the SLF documented within the Project area. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of five Native American contacts and suggested contacting them to provide information on sacred lands that may not be listed in the SLF. Each of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as part of compliance with AB 52.

As lead agency, the City mailed letters to the 10 listed Native American tribes identified by the NAHC and included on the City's consultation list. Letters were sent out to all contacts on November 10, 2016.

To date, the City has received one response to the notification letters. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation, stated the Project area is in a sensitive area and that the Project may cause a substantial adverse change in the significance of tribal cultural resources, and requested a Native American monitor be present during all ground disturbances carried out during the Project. The letter provided some information on tribal history and traditional land uses and noted that resources may exist below existing developments. Chairman Salas requested formal consultation with the City.

A telephone consultation occurred on July 2, 2018 and was attended by the City and Chairman Salas. During the call Chairman Salas stated that Wilshire Boulevard is a former trading route and trail used by Native Americans and should be considered a tribal cultural resource. In follow-up emails Chairman Salas provided the City with the following exhibits as evidence to support the claims stated on the call:

Exhibit 1: excerpt from PRC 21074(a)(1) defining a tribal cultural resource;

Exhibit 2: two articles discussing sacred landscapes and sacred places;

Exhibit 3: one article discussing Rancho La Brea;

Exhibit 4: article discussing Native American trails;

Exhibit 5: article titled Cultural Resources from an Indigenous Perspective;

Exhibit 6: map of Los Angeles County, ca. 1898, cropped to show the Project area and vicinity along Wilshire Boulevard;

Exhibit 7: screenshot of the Kirkman-Harriman Map projected onto an aerial street map in GoogleEarth showing the Project area and vicinity;

Exhibit 8: Wikipedia webpage for Wilshire Boulevard; and

Exhibit 9: webpage about Native Americans from the City of Culver City website.

The City carefully considered Exhibits 1–9 in support of their claim that this project has the potential to impact tribal cultural resources, and the Tribe's request for the City to require its proposed mitigation measures to mitigate those potential impacts. The City has concluded that there is no substantial evidence to support a determination that this Project could reasonably foreseeably impact tribal cultural resources. Thus, after acting in good faith and after reasonable effort, the City was unable to reach an agreement with the Gabrieleño Band of Mission Indians-Kizh Nation. The City's findings will be submitted in a memo to the Tribe. Exhibits 1–9 are all taken from publicly available sources and therefore, are not considered to be confidential under Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c). The Tribal response letter and correspondences are included here as part of a confidential attachment.

No known tribal cultural resources were identified in a CHRIS records search within the Project area or a 0.5-mile (0.8-km) radius, and the NAHC search of the SLF did not identify any traditional lands or sites. The Native American village of Yaanga and Geveronga are the closest named villages documented in ethnographic accounts, estimated to have been located at least 6 km (3.7 miles) east of the Project area. Generally speaking, Native American artifacts and sites are more likely to be found near sources of water. The closest known permanent water source was the Los Angeles River, located approximately 6.9 km (4.3 miles) east of the Project area. An 1894 topographic map shows the Project area located between 300 and 350 m (984 and 1,148 feet) from unnamed streams that once formed tributaries of the Los Angeles River before it changed courses and became known as Ballona Creek. These streams appear to have been intermittent or ephemeral and only contained water during the wet season for short periods of time. Large Native American archaeological deposits have been documented at the confluence of these streams 6.6 km (4.1 miles) to the southwest, where they supported a wetland environment referred to by the Spanish as Las Cienegas. Seeps of asphaltum are another natural resource of known significance to Native Americans; the closest known source to the Project area is one at the present-day La Brea Tar Pits 3.0 miles (4.8 km) west of the Project area. There is no other evidence available to suggest the Project area offered any consistent or seasonal sources of water or other natural resources that would increase the likelihood of the presence of a temporary Native American camp. By comparison, the confluence of the Los Angeles River and Arroyo Seco near the village site of Yaanga around the historic core of Los Angeles has a higher likelihood of containing prehistoric archaeological sites, consistent with ethnographically documented village site locations.

One geotechnical bore identified alluvial sediments (i.e., sediments deposited by water) extending at least 21.3 m (70) feet below the paved surface in the Project area, which is otherwise developed as a high-rise tower and parking lot. The parking lot extends at least 1.5 m (5 feet) below the current sidewalk grade. The entire Project area was initially developed in the first decade of the nineteenth century as a residential tract, which had expanded to fill the entire city block by the 1920s and remained intact into the late 1950s before being razed for the construction of the Travelers Insurance Company Building and parking lot. Archaeological finds

near Union Station clearly demonstrate that the remains of Native American sites can exist within alluvial sediment deposits, underneath disturbed fill or strata containing Historic-period archaeological resources. However, because the demolition of the former residences and construction of the parking lot required excavation within the entirety of the Project area, the depth and extent of the disturbances substantially reduces the preservation potential for unknown tribal cultural resources within the alluvium. Because of these factors, SWCA finds the Project area has a low sensitivity for containing unknown tribal cultural resources.

No previously recorded tribal cultural resources were identified within the Project area. The City submitted notification letters to the tribal parties listed on the City's AB 52 notification list. The City received one response requesting consultation from the Gabrieleño Band of Mission Indians–Kizh Nation. After tribal consultation, the City concluded there is no substantial evidence of a tribal cultural resource within the Project area. SWCA finds that the Project would have no impacts to known tribal cultural resources. The Project area was further assessed for the potential to contain deeply buried, previously unidentified tribal cultural resources and was found to be low. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, the Project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources:

> Inadvertent Discovery of Tribal Cultural Resources: If 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 on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
>
> - Upon a discovery of a potential tribal cultural resource, the project permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.
>
> - If the City determines, pursuant to PRC Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource, 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 project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
>
> - The project permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
>
> - The project permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that

have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the project permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project permittee may request mediation by a mediator agreed to by the permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project permittee shall pay any costs associated with the mediation.

- The project permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study or 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 SCCIC at California State University, Fullerton.

- Notwithstanding the above, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the public under the applicable provisions of the California Public Records Act, California PRC, and shall comply with the City's AB 52 Confidentiality Protocols.

Based on the condition of approval, any potential impacts would be reduced to less than significant. Therefore, the Project will have less-than-significant impacts to tribal cultural resources.

XIX. Utilities And Service Systems

This section is based on the following items, included as **Appendix M** of this SCEA:

M-1 Los Angeles Bureau of Sanitation response, January 18, 2017.

M-2 Los Angeles Department of Water and Power response, January 24, 2017.

M-2 Water Supply Assessment, Los Angeles Department of Water and Power, March 21, 2017.

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

Less Than Significant Impact.

Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site.

Water

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. Using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012), the proposed water demand estimate is shown in **Table B.19-1, Estimated Future Water Demand**.

The existing water demand on the Site ranges from approximately 600 HCFs (1 hundred cubic feet is 748 gallons) per month in the winter to approximately 1,000 HCFs in the summer. This is equivalent to approximately 15,000 gallons per day (gpd) to 25,000 gpd.[223] The landscaped areas and the existing building are not billed separately. Therefore, for a conservative analysis to the future water demand, no credit is taken for the existing water demand that occurs on the landscaped lawn and plaza portion that would be removed.

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

[223] 600 HCFs x 748 gallons/HCF / 30 days = 15,000 gpd. 1,000 HCFs x 748 gallons/HCF / 30 days = 25,000 gpd.

As shown on **Table B.19-1, Project Estimated Water Consumption**, it is estimated the Project will consume a total of approximately 125,221 gallons per day (gpd) (or 140 acre-feet per year[224]) of water.

Table B.19-1
Estimated Future Water Demand

Use	Size	Water Use Factor[3] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings [4] (gpd)	Water Demand	
					(gpd)	AF / year
Proposed Uses[1]						
Residential – Studio	133 units	75 gallons / unit	9,975			
Residential – 1 Bedroom	475 units	110 gallons / unit	52,250			
Residential – 2 Bedroom	152 units	150 gallons / unit	22,800			
Base Demand Adjustment (residential)[5]			8.754			
Residential Units Total	**760 du**		**93,779**	**15,742**	**78,037**	**87.42**
Lobby	2,660	50 gallons / 1,000 sf	133			
Leasing	474	50 gallons / 1,000 sf	24			
Pool 1	1,312 sf		123			
Pool 2	1,069 sf		100			
Gymnasium	6,531 sf	650 gallons / 1,000 sf	4,245			
Indoor Amenity Spaces	13,086 sf	50 gallons / 1,000 sf	654			
Landscape	12,083 sf	50 gallons / 1,000 sf	304			
Base Demand Adjustment (residential Common)[5]			304			
Residential Common Total			**6,188**	**847**	**5,341**	**5.98**
Retail	6,359 sf	50 gallons / 1,000 sf	318			
Base Demand Adjustment (commercial Common)[5]			83			
Commercial Total			**401**	**258**	**143**	**0.16**

[224] 1 acre foot = 325,851.429 US gallons.

Landscaping [6]	**12,325 sf**		**1,151**	**521**	**630**	**0.71**
Parking Structure [7]	**567,734 sf**		**373**	**0**	**373**	**0.42**
Cooling Tower Total	**1,500 tons**		**53,460**	**10,692**	**42,768**	**47.91**
Proposed Subtotal			**153,352**	**28,060**	**127,292**	**142.60**
Less Existing to be removed					**(315)**	**(0.35)**
Less Additional Conservation [8]					**(1,756)**	**(1.97)**
Net Additional Water Demand					**125,221**	**140.28**

[1] Provided by the City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter.
[2] The existing water demand is based on the LADWP billing data (average of years 2010 to 2015) and it includes water use for the surrounding parking lot, landscape, and cooling tower. Note that water use credit is only given for removed parking and landscaping.
[3] Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at http: www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.
[4] The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (Calgreen), 2014 Los Angeles Plumbing Code, and 2014 LA Green Building Code.
[5] Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.
[6] Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Model Water Efficient Landscape Ordinance.
[7] Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumptions.
[8] Water conservation due to additional conservation commitments agreed by the Applicant.
Source: LADWP, Water Supply Assessment, March 21, 2017.

The Water Service Organization (WSO) would be able to provide the domestic needs of the Project from the existing water system. The Project Applicant will consult with the LADBS and LAFD to determine fire flow requirements for the Project. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or

service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the water conveyance system would be less than significant.

While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements. Section 57.507.3.1 of the LAMC establishes fire flow standards for specified land uses, including Low Density Residential, High Density Residential and Commercial Neighborhood, Industrial and Commercial, and High Density Industrial and Commercial or Industrial. Based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City. Additionally, as required by the LAMC, hydrants would be spaced per the hydrant spacing requirements set forth in Section 57.507.3.2 of the LAMC to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities.

Wastewater

Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)[225], which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,[226] and currently treats an average daily flow of approximately 362 mgd.[227] Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's

225 LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm.
226 Los Angeles Sanitation: http://www.lacitysan.org/irp/Wastewater.htm.
227 LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.

wastewater discharge would be typical for a mixed-use residential and commercial building and would not require any on-site treatment before flowing to the sewer.

As shown on **Table B.19-2, Project Estimated Wastewater Generation**, it is estimated the Project will generate a total of approximately 219,095 gallons per day (gpd) (or 0.219 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

Table B.19-2
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential – Studio	133 units	75 gallons / unit	9,975
Residential – 1 Bedroom	475 units	110 gallons / unit	52,250
Residential – 2 Bedroom	152 units	150 gallons / unit	22,800
Retail	6,359 sf	25 gallons / 1,000 sf	159
Lobby	2,660 sf	50 gallons / 1,000 sf	133
Leasing	474 sf	120 gallons / 1,000 sf	57
Gymnasium	5,382 sf	200 gallons / 1,000 sf	1,076
Indoor Amenity Spaces	22,788 sf	350 gallons / 1,000 sf	7,976
Pool 1	9.184 cf	7.48 gallons / cf	68,696
Pool 2	7,483 cf	7.48 gallons / cf	55,973
		Total Increase	**219,095**

Note: sf = square feet; cf = cubic feet; gpd = gallons per day
Bureau of Sanitation response, January 18, 2017.
Table: CAJA Environmental Services, April 2018.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system which currently treats an average daily flow of approximately 362 mgd.[228] Thus, there is a remaining capacity of approximately 88 mgd. The increase in wastewater generation represents approximately 0.24% of the remaining capacity[229], and would not have a significant impact on treatment plant capacity.

As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater

[228] LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.
[229] 0.219 mgd / 88 mgd x 100% = 0.24%.

treatment requirements will be less than significant. The Project Site will be served by the LABS, which provides municipal wastewater services to the City.

The Site is served by an existing 8-inch line on Wilshire Boulevard that feeds into a 33-inch line on Wilton Place before discharging into a 57-inch line on 9th Street. The current approximate flow level (depth/diameter or d/D) and the design capacities at d/D of 50% is shown in **Table B.19-3**.[230]

Table B.19-3
Sewer Infrastructure

Pipe Diameter (inches)	Location	Current Gauging d/D (%)	50% Design Capacity
8	Wilshire	*	410,225 gpd
10	Wilshire	45	630,576 gpd
5. 33	6. Wilton	7. 34	3. 10.04 MGD
9. 57	10. 9th	11. 17	2. 22.61 MGD

* no gauging available. gpd = gallons per day. MGD = million gallons daily.
Bureau of Sanitation response, January 18, 2017.
Table: CAJA Environmental Services, April 2017.

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater.

Stormwater Drainage

As discussed in **Section B.10**, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site. The Project Site is primarily covered with a parking structure (hardscape). The Project will similarly occupy the entire Project Site with two new

[230] Bureau of Sanitation response, January 18, 2017.

buildings and a podium parking structure that will be screened from view. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project and the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

Electric Power

As discussed in **Section B.6**, above, LADWP has confirmed that electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Natural Gas

As discussed in **Section B.6**, above, there is sufficient natural gas supplies to serve the Project's natural gas demand. Accordingly, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded natural gas facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Telecommunications

The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. All on-site work would be within overall Project construction, which has been analyzed. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Impacts would be less than significant.

b) Would the project have sufficient significant water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact.

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

(a) Residential developments of more than 500 dwelling units;

(b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

(c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;

(d) Hotels or motels with more than 500 rooms;

(e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;

(f) Mixed use projects containing any of the foregoing; or

(g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

WSA Results

The Project is subject to SB 610 and conducted a Water Supply Assessment (WSA). According to the WSA and included in **Table B.19-1** above, the Project total net water demand is estimated to be 140 acre-feet per year (AFY), which includes annual water conservation. Savings due to water conservation ordinances are approximately 31 AFY, and savings due to additional voluntary conservation measures are approximately 2 AFY.[231] These conservation measures are listed as **WAT-PDF-1**. LADWP's WSA finds adequate water supplies will be available to meet the total additional water demand. LADWP anticipates the projected water demand can be met during normal, single-dry and multiple-dry water years, in addition to the existing and planned future demands on LADWP.[232]

Based on LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Therefore, the Project would not be anticipated to require new or expanded water entitlements.

Project Design Feature

WAT-PDF-1 The Developer has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

- High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less
- Showerheads with a flow rate of 1.75 gallons per minute, or less.
- Drip/ Subsurface Irrigation (Micro-Irrigation)
- Proper Hydro-zoning/Zoned Irrigation - (groups plants with similar water requirements together)
- Drought Tolerant Plants - 70% of total landscaping

The Developer has also committed to comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No. 183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as applicable:

- Catch Basin Insert - a device that can be inserted into an existing catch basin design to provide some level of runoff contaminant removal.
- Catch Basin Screens
- Cistern - captures storm water runoff as it comes down through the roof

[231] LADWP, Water Supply Assessment, March 21, 2017.
[232] LADWP, Water Supply Assessment, March 21, 2017.

gutter system, if infiltration is not feasible

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.

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's wastewater generation would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant.

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?

Less Than Significant Impact.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 167.60 million tons.[233] In 2017, approximately 5.011 million tons of solid waste were disposed of at the County's Class III landfills. In addition, approximately 0.490 million tons of solid waste were disposed of at County transformation facilities in 2017.[234] Assuming a Countywide diversion rate of 65 percent for 2017, the 2017 Annual Report estimated that approximately 19.18 million tons of solid waste were generated within the County in 2017.

Of the remaining Class III landfill capacity in the County of Los Angeles, approximately 149.77 million tons are available to the City of Los Angeles.[235] As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity. The Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 126.4 million tons in 2032, will not exceed the 2017 remaining permitted Class III landfill capacity of 167.60 million tons.

[233] This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

[234] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

[235] Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility's wasteshed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

Scholl Canyon Landfill in Glendale has 4.70 million tons of remaining capacity and Sunshine Canyon Landfill in Sylmar has 68.04 million tons of remaining capacity.[236]

The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 55.71 million tons. In 2017, approximately 0.423 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity and based on the average disposal rate of 1,356 tons per day (based on 260 days of disposal per year) in 2017, this capacity would be exhausted in 158 years.[237]

In 2017, the City of Los Angeles disposed of approximately 2.9 million tons of solid waste at the County's Class III landfills and approximately 23,810 tons at transformation facilities.[238] The 2.9 million tons of solid waste accounts for approximately 1.9 percent of the total remaining capacity (149.77 million tons) for the County's Class III landfills open to the City.[239]

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition will remove approximately 224,844 square feet of the existing parking structure. Demolition would produce demolition waste and recycling opportunities of raw materials and export of approximately 125,400 cy of dirt.[240]

Construction of the approximately 672,947 square feet of parking structure would generate 1,353 tons of waste and the approximately 660,040 square feet of new floor area would generate approximately 1,445 tons of construction waste.[241]

This amount of soil exported, construction and debris waste would represent approximately 0.03 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 55.71 million tons. Thus, the total amount of construction and demolition waste generated by the

[236] Disposal quantities are based on actual tonnages reported by owners/operators of permitted solid waste disposal facilities to the Los Angeles County Department of Public Works' Solid Waste Information Management System, as of December 31, 2016.

[237] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

[238] These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

[239] 2.9 million tons ÷ 78.71 million tons x 100% = 3.7 %.

[240] Client provided, July 2016.

[241] Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).

Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. In addition, Sunshine Canyon and Scholl Canyon have capacity to handle Project-generated construction-related waste including demolition and soil export. Therefore, construction impacts to solid waste facilities would be less than significant.

Operation

As shown on **Table B.19-4, Project Estimated Solid Waste Generation**, it is estimated the Project will generate a total of approximately 1,712 tons per year of solid waste.

Table B.19-4
Project Estimated Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Total (tons)
Residential	760 units	2.23 tons / unit	1,695
Commercial	18 employees	0.91 tons / employee	17
		Total Increase	**1,712**

Note: 1 ton = 2,000 pounds.
Residential solid waste factor is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year).
Non-residential solid waste factor (City of Los Angeles Bureau of Sanitation, Waste Characterization and Quantification Study, Table 4, July 2002) is based on tons per employee per year:
3.03 for hotel
0.91 for commercial/retail
2.98 for restaurant
Table: CAJA Environmental Services, June 2018.

In compliance with LAMC, the Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

The increase in solid waste disposal would represent an approximate 0.05 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 2.9 million tons.

The increase in solid waste disposal would represent approximately 0.001 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles. Therefore, no Project impacts related to solid waste would occur and the Project is adequately served. Therefore, operation impacts to landfills and solid waste services will be less than significant.

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

Less Than Significant Impact.

Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal.

In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[242] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials.

Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

[242] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

XX. Wildfire

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

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

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

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

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

No Impact.

There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, [243] nor is it located within a City-designated fire buffer zone.[244] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur.

[243] ZIMAS, Parcel Profile Report, http://zimas.lacity.org/. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[244] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

XXI. 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 Impact.

A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. The Project Site is developed with a commercial building and parking structure. The Project would not impact any protected trees as none of the trees are protected species. However, environmental impacts may result due to the loss of the trees on the Site. The Project would remove 4 street trees and 39 private property trees.[245] In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis and the street trees to be removed would be replaced on a 2:1 basis.

The Project will have a less than significant impact on historic resources, archeological resources, paleontological resources, and human remains.

The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will 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.

A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the SCEA.

[245] Tree Report, Harmony Gardens, October 24, 2018.

In accordance with CEQA Guidelines Section 15064(h), this IS/SCEA includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

A total of 75 cumulative projects were identified in the study area; these projects are listed in Table 5 and illustrated in Figure 6 (both in *Transportation Impact Analysis, Fehr & Peers, January 2017)*. The Related Projects include approximately:

- 11,150 residential units (apartments, condominiums)
- 623,761 square feet retail
- 50,369 square feet restaurant and bar
- 313,794 square feet office and church
- 773 hotel rooms
- 1,262 student seats
- 1,272 theater seats
- 20,178 square feet health club

There are six proposed developments nearby the Project Site that were identified by the Project's traffic study.[246]

- No. 2 – 3670 Wilshire, 378 dwelling units and 8,000 square feet of commercial, approximately 400 feet west of the Site.
- No. 11 – 3663 Wilshire, 55,380 square feet office and 636 seat school, approximately 350 feet northwest of the Site.
- No. 16 – 3640 Wilshire, 209 dwelling units, approximately 60 feet west of the Site.

[246] Transportation Impact Analysis, Fehr & Peers, January 2017.

- No. 23 – 800 Harvard, 131 dwelling units and 7,000 square feet of retail, approximately 800 feet south of the Site.
- No. 33 – 3545 Wilshire, 433 dwelling units, and 49,849 square feet of retail, approximately 425 feet northeast of the Site.
- No. 51 – 815 Kingsley, 90 dwelling units, approximately square feet of retail, approximately 900 feet south of the Site.

The closest related project, Related Project No. 16, was completed in early 2019, and thus would not combine with the Project's construction phase. The other Related Projects are not within the immediate vicinity (within a block) of the Project, and there are several intervening buildings between them. The balance of the Related Projects, not listed above, have several intervening buildings and major roadways/freeway in between, and are at least 1,000 feet away or more, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of related projects is expected to occur in accordance with adopted plans and regulations. As per ZI No. 2145 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture and Forestry Resources

Development of the Project in combination with the Related Projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in the Air Quality section of this SCEA, above, because the construction-related and operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. None of the Related Projects is close to the Project Site. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the Related Projects and the Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

Biological Resources

The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Project Site. The Project would remove 4 street trees and 39

private property trees.[247] In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis and the street trees to be removed would be replaced on a 2:1 basis. The Project would have no impact upon other biological resources. Development of the Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. The Project would not be cumulatively considerable since it is unknown if the Related Projects have potential significant impacts such as tree or habitat removal. Thus, cumulative impacts to biological resources will be less than significant.

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. The Project will have no historic impact and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. Cumulative impacts on cultural resource will be less than significant.

Energy

Each of the Related Projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each Related Projects would be required to be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each Related Projects would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure. Finally, each Related Projects would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts would be less than significant.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Related

[247] Tree Report, Harmony Gardens, October 24, 2018.

Projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, the Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG analysis is a cumulative analysis and thus, there would be no cumulative significant impact as shown above (see Part B.7 of this SCEA). The Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Land Use

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all related projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. The Project would not make a cumulatively considerable contribution to land use planning, and cumulative impacts would be less than significant. Therefore, cumulative land use impacts would be less than significant.

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

Noise

Development of the Project in conjunction with the Related Projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each Related Project (that has not yet been built) would be localized in nature. None of the Related Projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from the Related Project, were it to occur concurrently with the Project, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from these sites to the nearby receptors.

Additionally, each of these Related Projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. Each related project would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study (included as an appendix to this SCEA). Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Population and Housing

The Related Projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles. Any residential related projects would result in direct population growth. The Related Projects that involve residential developments would contribute approximately 11,150 new residential dwelling units to the area, generating approximately 27,095 new residents.[248] The City is expected to increase its population by 199,079 persons between 2010 and 2020. The related project growth would not exceed the projected growth. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. Because the Project would not displace any residents, and the population growth associated with the Project is 1,847 persons, the Project's population growth would not be cumulatively considerable. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by a variety of fire stations (Nos. 29, 11, 26, 52).[249] The Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project

[248] The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates.

[249] LAFD Fire Station Finder: http://www.lafd.org/fire_stations/find_your_station.

that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

Given the geographic range of the Related Projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the Related Projects is expected to result in a cumulative increase in the demand for school services. Development of the Related Projects include 1,262 student seats and is projected to generate approximately 11,150 new residential dwelling units to the area, which would generate additional demands upon school services. The Related Project would generate approximately 4,460 elementary school students, 1,115 middle school students, and 2,230 high school

students.[250] These Related Projects would have the potential to generate students that would attend the same schools as the Project. However, each of the projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Cumulative impacts on schools would be less than significant.

Parks and Recreation

Development of the Project in conjunction with the related projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

Library

Given the geographic range of the Related Projects, they would be served by a variety of libraries (De Neve, Pio Pico, Pico Union, Wilshire, Memorial).[251] Development of the related projects would likely generate additional demands upon library services. The LAPL has no plans for new or expanded libraries; however, the Related Projects, like the Project, would contribute to the City General Fund, which goes to, among other things, library services. Therefore, the cumulative impacts related to library facilities would be less than significant.

Traffic

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing with Project scenario) and a cumulative impact analysis (future baseline with Project scenario). The future includes ambient growth (1 percent per year increase) and the related projects. The future traffic conditions with the Project show that none of the 17 study intersections would have a significant impact in either the existing or future baseline (cumulative) condition after mitigation (see Section B.17, Transportation, of this SCEA). Thus, there would be no CMP intersections or freeways impacts. Therefore, the Project's cumulative impact is considered less than significant.

Utilities

[250] Residential land uses: Elementary:0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household.

[251] LAPL Locations: http://www.lapl.org/branches.

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the Related Projects in the City. In addition, several of the Related Projects could be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Scholl Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

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

Less Than Significant Impact.

A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.