



Sustainable Communities Environmental Assessment

1050 La Cienega Boulevard Project

Case Number: ENV-2022-2280-SCEA

Related Case Number: DIR-2022-2279-TOC-SPR-VHCA

Project Location: 1022, 1024, 1028, 1034, 1036, 1038, 1044, 1048, 1054, 1056, 1060, 1066 S. La Cienega Boulevard, Los Angeles, CA 90035

Community Plan Area: Wilshire

Council District: 5 - Koretz

Project Description: The Project would construct a mixed-use development with 290 residential units (36 studio units, 158 1-bedroom units, and 96 2-bedroom units) and 7,500 square feet of restaurant commercial use in a 28-story, 297,690-square-foot building. The Project would include a total of 426 vehicle parking spaces, 184 bicycle parking spaces (164 long term and 20 short term), and 54,540 square feet of open space, as well as an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site. Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following:

1. Pursuant to LAMC Section 12.22 A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), approval of a 290-unit Tier 3 TOC development that would set aside 10 percent (29 units) of the Project's total number of units for Extremely Low Income households and would utilize the following Base and Additional Incentives: Base Incentives: a. Up to 70 percent increase in density (TOC Guidelines, Section VI.1.a.iii); b. 0.5 minimum required parking spaces for residential units (TOC Guidelines, Section VI.2.a.i.4); c. 30 percent parking reduction for nonresidential (TOC Guidelines, Section VI.2.e.iii); d. FAR of a 3.75:1 in a commercial zone. (TOC Guidelines, Section VI.1.b.iii). Additional Incentives: e. Utilize any or all of the yard requirements for the RAS3 zone per LAMC 12.10.5 (TOC Guidelines, Section VII.1.a.i).
2. Pursuant to LAMC Sections 16.05.C and 16.05.D, site plan review for a project for which by-right units minus existing units is greater than 50 units.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, excavation permits, foundation permits, building permits, street tree removal permits, and sign permits.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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August 2022

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1 INTRODUCTION

An application for the proposed 1050 La Cienega Boulevard Project (Project) has been submitted to the City of Los Angeles Department of City Planning (Department of City Planning) for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA).

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

The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) is SCAG’s most recent RTP/SCS. The 2020-2045 RTP/SCS is a long-range visioning plan for the six-county SCAG region that highlights the existing land use and transportation conditions throughout the SCAG region and forecasts how the plan will meet the region’s transportation needs between 2020 and 2045, as well as achieve CARB’s GHG emissions reduction targets. Specifically, the 2020-2045 RTP/SCS identifies and prioritizes expenditures of anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as aviation ground access. It also includes a set of visions, goals, objectives, policies, and performance measures developed through public and stakeholder outreach sessions across SCAG’s region. On September 3, 2020, SCAG’s Regional Council formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB’s 2035 GHG emission reduction target.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for “transit priority projects” (as described below) that are consistent with SCAG’s 2020-2045 RTP/SCS.

1.1 TRANSIT PRIORITY PROJECT CRITERIA

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

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

1.2 SCEA PROCESS AND STREAMLINING PROVISIONS

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards, or criteria set forth in the prior applicable EIR (e.g., 2020-2045 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:
 - a. Growth-inducing impacts, and
 - b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.¹
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
5. The SCEA may be approved by the lead agency after the lead agency's legislative body, or a planning commission if local ordinances allow for the appeal of a CEQA determination

¹ "Regional transportation network" means all existing and proposed transportation system improvements, including the state transportation system, that were included in the transportation and air quality conformity modeling, including congestion modeling, for the final regional transportation plan adopted by the metropolitan planning organization, but shall not include local streets and roads. Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads.

by a non-elected decisionmaker to the legislative body, conducts a public hearing, reviews comments received, and finds the following:

- a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
 - b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
 - i. Changes or alterations have been required or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
 - ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.3 REQUIRED FINDINGS

Based on the information contained in Section 2 (Project Description), Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), Section 4 (Mitigation Measures from Prior EIRs), and Section 5 (Sustainable Communities Environmental Impact Analysis) of this document, the City finds that preparation of a SCEA in accordance with Public Resources Code Section 21155.2(b) is appropriate for the Project for the following reasons:

- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project Site in the 2020-2045 RTP/SCS prepared by SCAG, which is the MPO for the City. See Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), page 3-1 for additional information on the Project's consistency with this finding. La Cienega Boulevard is a livable corridor, as shown in Figure 3-6. The Project is also siting market rate and affordable housing near multiple identified RTP/SCS Job Centers.
- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG would, if implemented, achieve the greenhouse gas emission reduction targets.
- The Project qualifies as a TPP pursuant to Public Resources Code Section 21155 in that the Project contains more than 50 percent residential use; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. The qualifying major transit stops include the intersection of La Cienega and Olympic Boulevard, 225 feet north of the Site that provides access to Metro Line 28 and Metro Line 105; the intersection of

Pico Boulevard and La Cienega Boulevard 1,475 feet south of the Site that provides access to Metro Line 105 and BBB Line 7; and the intersection of Wilshire Boulevard and La Cienega Boulevard, 2,350 feet north of the Site that will provide access to the future D Line Extension Wilshire/La Cienega Station.

- The Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d).
- The Project incorporates all relevant and applicable mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to Public Resources Code Section 21081, including SCAG's 2020-2045 RTP/SCS Program EIR. See Section 4 (RTP/SCS Mitigation Measures) for the description of the mitigation measures imposed on the Project.
- All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA in an initial study have been identified and analyzed in an initial study.
- As outlined in detail in Section 5 (Initial Study/Sustainable Communities Environmental Impact Analysis) changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant. The specific impact areas with mitigation measures include Cultural Resources (historic, archaeological), Geology and Soils (paleontology), Hazards and Hazardous Materials (release of hazardous materials and list of hazardous sites), and Noise (construction noise and construction vibration).

1.4 ORGANIZATION OF THE SCEA

Based on the information presented above, the SCEA for the Project is organized as follows:

Section 1. Introduction: This section provides introductory information about the Project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.

Section 2. Project Description: This section provides a detailed description of the environmental setting and the Project characteristics.

Section 3. SCEA Criteria and Transit Priority Project Consistency: This section includes a discussion of the Project's consistency with the TPP criteria listed above and demonstrates that the Project satisfies all necessary criteria for approval of a SCEA as set forth in California Public Resources Code Sections 21155 and 21155.2.

Section 4. Mitigation Measures from Prior EIRs: This section identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project.

Section 5. Sustainable Communities Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of Project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified on the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Section 6. SCEA Conditions: This section identifies all conditions (mitigation measures, project design features, and conditions of approval) the Project would be required to implement.

Appendices: Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the Department of City Planning.

2 PROJECT DESCRIPTION

This section is based on the following item, which is included in Appendix A to this SCEA:

A Plans, SCB, August 16, 2022.

2.1 Introduction

The Project entails the removal of a vacant lot and the construction of a new 332-foot in height, 28-story, 297,690-square-foot, mixed-use building with 290 dwelling units, including 29 Extremely Low Income affordable housing units, and approximately 7,500 square feet of new commercial restaurant use.¹ The Project includes 426 vehicle parking spaces, 184 bicycle parking spaces, and 54,540 square feet of open space.

2.2 Project Information

Project Title: 1050 La Cienega Boulevard Project

Document Type: Sustainable Communities Environmental Assessment (SCEA)

Environmental No.: ENV-2022-2280-SCEA

Related Case No.: DIR-2022-2279-TOC-SPR-VHCA

Project Location: 1022, 1024, 1028, 1034, 1036, 1038, 1044, 1048, 1054, 1056, 1060, 1066 S. La Cienega Boulevard, Los Angeles, CA 90035

Lead Agency: City of Los Angeles, Department of City Planning
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¹ To provide a conservative analysis, the commercial uses were evaluated using trip rates for high-turnover (sit-down) restaurant uses. This provides greater number of trips as compared to generic commercial such as retail.

2.3 Environmental Setting

2.3.1 Project Site Location

The Project Site is located on the east side of La Cienega Boulevard, between Olympic Boulevard and Whitworth Drive. The Site consists of 10 parcels zoned C2-1-O, located in the Wilshire Community Plan area of the City of Los Angeles (City). The City of Beverly Hills is located north of Olympic Boulevard, 300 feet north of the Site.

See Figure 2-1, Regional Map, for the location of the Project Site within the context of the City. See Figure 2-2, Aerial Map, for an aerial view of the Site and the immediate surrounding area.

2.3.2 Surrounding Land Uses and Zoning

North adjacent to the Site is a 1-story commercial building (1016-1018 La Cienega Boulevard) that houses an auto repair facility (Matrix Collision Repair Facility). This area is zoned C2-1-O.

South adjacent to the Site is a 3-story commercial building (1080 La Cienega Boulevard) that houses a variety of retail, restaurant, and acupuncture clinics. This area is zoned C2-1-O.

West across La Cienega Boulevard are a variety of uses listed below (from north to south). This area is zoned C2-1-O.

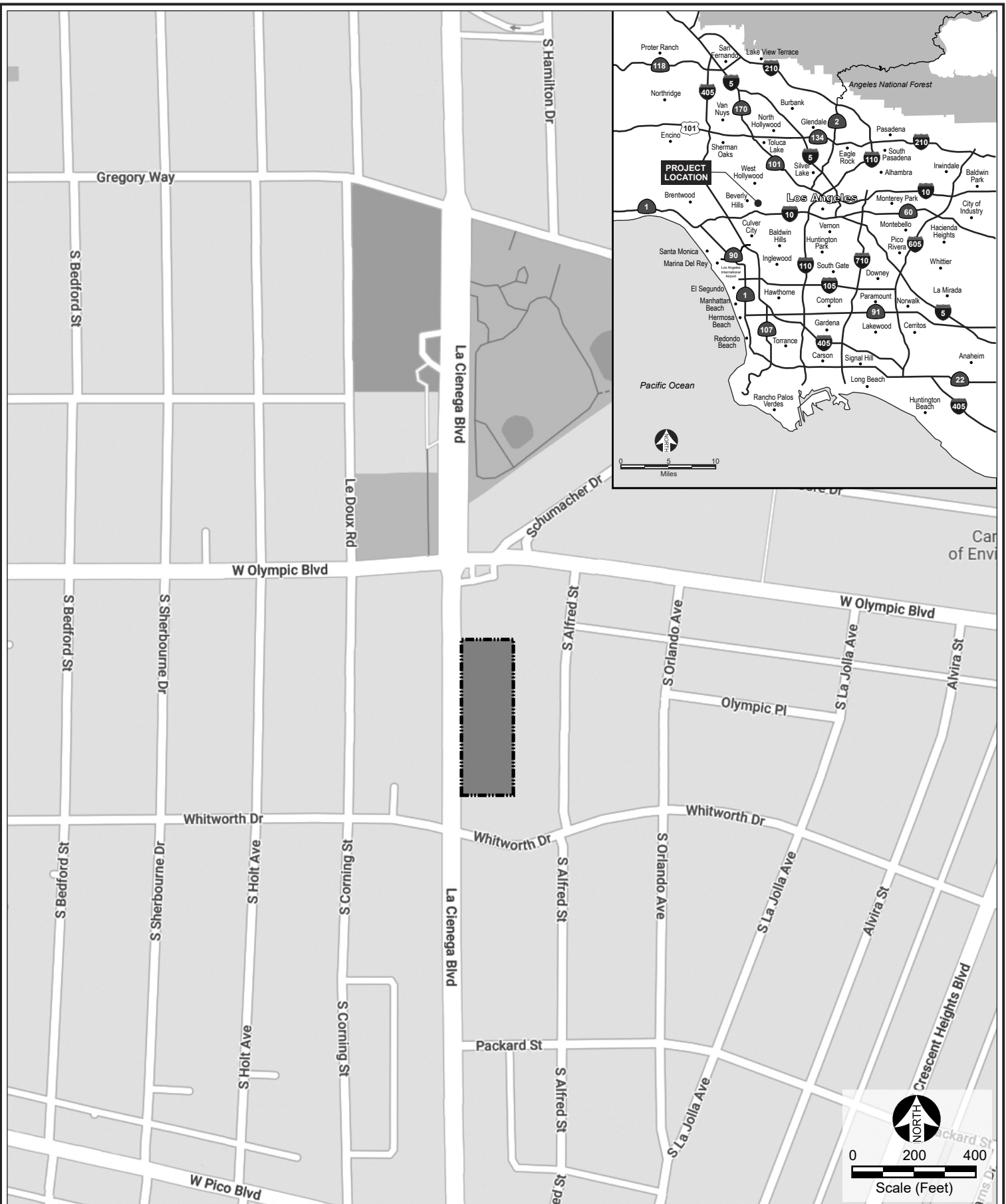
- Surface parking lot (1019-1029 La Cienega Boulevard)
- 3-story religious building (1039 La Cienega Boulevard) that houses Temple Beth Am
- 4-story education center (1055 La Cienega Boulevard) that houses the Pressman Education Center and Academy
- 4-story residential building (1071 La Cienega Boulevard) that houses the Beverly Park Senior Apartments

East adjacent to the Site are several 2-story residential duplex buildings (1017-1077 Alfred Street). This area is zoned R2-1-O-HPOZ.

The school closest to the Site is Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard, 90 feet west of the Site.

The designated historic resource closest to the City is the South Carthay Historic Preservation Overlay Zone (HPOZ), located directly east of the Site with the nearest contributors consisting of the residential buildings along Alfred Street.² The Project Site is not in the HPOZ.

² HistoricPlacesLA: <http://historicplacesla.org/reports/261df8e0-0896-46ee-a8b1-459af59afd57>



Legend

 Project Site

Source: Google Maps 2022.

**Figure 2-1
Regional Location Map**



Legend



Project Site

Source: Google Maps 2022.

Figure 2-2
Aerial Map

2.3.3 Regional and Local Access

Regional access is provided by the following:

- I-10 (Santa Monica) Freeway, located 1.45 miles south of the Site
- I-405 (San Diego) Freeway, located 4.15 mile west of the Site

Local access is provided by the following:³

- La Cienega Boulevard (Avenue I in the Mobility Plan 2035), adjacent to the west
- Whitworth Drive (Local Street Standard), 100 feet south of the Site
- Alfred Street (Local Street Standard), 150 feet east of the Site
- Olympic Boulevard (Boulevard II), 225 feet north of the Site
- Schumacker Drive (Local Street Standard), 330 feet northeast of the Site
- Pico Boulevard (Avenue I), 1,450 feet south of the Site
- Wilshire Boulevard (Avenue I), 2,250 feet north of the Site

2.3.4 Bicycle Facilities

The following bicycle-friendly streets are located near the Site:⁴

- Schumacher Drive, 330 feet northeast of the Site
- Whitworth Drive, 100 feet south of the Site
- Pico Boulevard, 1,450 feet south of the Site

2.3.5 Pedestrian Facilities

There is a sidewalk along the Project Site's west side on La Cienega Boulevard. Striped crosswalks are provided at all legs of the nearest signalized intersections (La Cienega Boulevard / Whitworth Drive and La Cienega Boulevard / Olympic Boulevard).

³ NavigateLA, Mobility Plan 2035: <https://navigatela.lacity.org/navigatela/>, accessed March 30, 2022.

⁴ According to LADOT's Bike Program, Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians. <https://ladotbikeblog.wordpress.com/bfs/>

2.3.6 Public Transit

The Site is in a High Quality Transit Area (HQTA)⁵, which reflects areas with rail transit service or bus service where lines have peak headways of less than 15 minutes.⁶

The Site is also in a Transit Priority Area which is an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the PRC defines a “major transit stop” as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For purposes of Public Resources Code (PRC) Section 21099, a transit priority area also includes major transit stops in the City that are scheduled to be completed within the planning horizon of the SCAG RTP/SCS.⁷

Los Angeles County Metropolitan Transportation Authority (Metro) and Santa Monica Big Blue Bus (BBB) operate public transit in the area.⁸

- Metro Local 105 runs north-south along La Cienega Boulevard and stops at Whitworth Drive, 115 feet south of the Site. The latest schedule (effective June 26, 2022) provides service every 10 minutes during the AM and PM peak periods.⁹
- Metro Local 28 runs east-west along Olympic Boulevard and stops at La Cienega Boulevard, 225 feet north of the Site. The latest schedule (effective June 26, 2022) provides service every 8-15 minutes during the AM and PM peak periods.¹⁰
- BBB Lines 7 and Rapid 7 run east-west along Pico Boulevard and stop at La Cienega Boulevard, 1,450 feet south of the Site. The latest schedule (effective March 27, 2022) provides service every 14.5 minutes during the AM and PM peak periods.¹¹
- The extension of the Metro D (Purple)¹² subway line will include a station at Wilshire/La Cienega, 2,350 feet north of the Site. The line and station will open in 2024.¹³

The intersection of Olympic Boulevard and La Cienega Boulevard, 225 feet north of the Site, is a Major Transit Stop because it is served by Metro bus line 105 running north-south and Metro bus

⁵ SCAG, GIS: <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region>, accessed March 30, 2022.

⁶ SCAG, Sustainability Program: <http://sustain.scag.ca.gov/Documents/HQTA/Maps/LAMidCityWestsidescagHQTAeligible.pdf>, accessed March 30, 2022.

⁷ <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf> and PRC 21099(a)(7).

⁸ Metro System Map: <https://www.metro.net/riding/guide/system-maps/>, accessed March 30, 2022.

⁹ Metro schedule for Line 105: <https://www.metro.net/riding/schedules/?line=105-13157>

¹⁰ Metro schedule for Line 28: <https://www.metro.net/riding/schedules/?line=28-13157>

¹¹ BBB schedule for Line 7: <https://www.bigbluebus.com/Routes-and-Schedules/Route-7.aspx>. 29 qualifying stops within 420 minutes = 14.48.

¹² In January 2020, Metro renamed its rail line, and currently has a transitional naming system using both the letter and the color: <https://www.metro.net/riding/line-letters/>

¹³ Metro Purple Line Extension: <https://www.metro.net/projects/westside/>

line 28 running east-west. Both lines have a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods

2.3.7 Planning and Zoning

Table 2-1 lists the Site’s assessor parcel numbers (APNs), zoning and General Plan land use designation. The Project Site lot area is 79,623 square feet¹⁴ (or 1.83 acres). The Project Site has a street frontage on the La Cienega side measuring approximately 504 feet 10 inches in length.¹⁵

The Project Site is zoned C2-1-O (Commercial zone in Height District 1, Oil Drilling District) with a General Plan designation of General Commercial.

**Table 2-1
Project Site**

Address	Lot	APN	Zone	General Plan
1022 S. La Cienega Boulevard	119	5087-001-040	C2-1-O	General Commercial
1024 S. La Cienega Boulevard		5087-001-041		
1028 S. La Cienega Boulevard	120	5087-001-040		
None		5087-001-023		
1034 S. La Cienega Boulevard	121	5087-001-023		
1036, 1038 S. La Cienega Boulevard	122	5087-001-024		
1044 S. La Cienega Boulevard	233			
1048, 1054 S. La Cienega Boulevard	234			
1056 S. La Cienega Boulevard	235	5087-001-042		
1060 S. La Cienega Boulevard	236			
1066 S. La Cienega Boulevard	237			

Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, March 2022.

In addition, the Project Site falls within the boundaries of the following:

- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2498 Local Emergency Temporary Regulations – Time Limits and Parking Relief
- Methane Zone

Finally, the Project Site is identified in ZIMAS as a Transit Oriented Communities (TOC) Tier 3 based on the shortest distance between any point on the lot and a qualified Major Transit Stop.¹⁶

Based on the schedule above, the qualifying Major Transit Stops include the following:

¹⁴ Plans, SCB, August 16, 2022. Included as Appendix A to this SCEA.

¹⁵ Plans, SCB, August 16, 2022. Included as Appendix A to this SCEA.

¹⁶ Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

- existing major transit stop: intersection of La Cienega and Olympic Boulevard, 225 feet north of the Site that provides access to Metro Line 28 and Metro Line 105;
- existing major transit stop: intersection of Pico Boulevard and La Cienega Boulevard 1,475 feet south of the Site that provides access to Metro Line 105 and BBB Line 7; and
- planned major transit stop: intersection of Wilshire Boulevard and La Cienega Boulevard, 2,350 feet north of the Site that will provide access to the future D Line Extension Wilshire/La Cienega Station.

2.3.8 Existing Conditions

The Project Site is currently vacant. There are four street trees on La Cienega Boulevard adjacent to the Project Site, including one Indian laurel fig (*Ficus microcarpa*) and three fern pines (*Afrocarpus falcatus*).¹⁷ None of these trees is considered a “protected tree” as defined by the City.¹⁸ There are no onsite trees.

2.4 Project Description

2.4.1 Project Overview

The Project would construct a mixed-use development with 290 residential units (36 studio units, 158 1-bedroom units, and 96 2-bedroom units)¹⁹ and 7,500 square feet of restaurant commercial use in a 28-story, 297,690-square-foot building. The Project would include a total of 426 vehicle parking spaces, 184 bicycle parking spaces (164 long term and 20 short term), and 54,540 square feet of open space. See Figure 2-3, Site Plan, for the Project site plan.

Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site as well as an approximately 4,500 square foot publicly accessible pocket park located at the northern portion of the Project Site.

In order to develop the Project as proposed, the Project Applicant is seeking Base and Additional Incentives from the City’s adopted Transit Oriented Communities (TOC) Guidelines with the provision of affordable housing.

¹⁷ Tree Report, Carlberg Associates, May 10, 2022. Refer to Appendix C.

¹⁸ LAMC Section 46.01: “PROTECTED TREE” means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*). (b) Southern California Black Walnut (*Juglans californica* var. *californica*) (c) Western Sycamore (*Platanus racemosa*) (d) California Bay (*Umbellularia californica*) This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.

¹⁹ The 158 1 bedroom units include 119 1-bedroom units and 39 1-bedroom+den units. The 96 2-bedroom units include 88 2-bedroom units and 8 penthouse units.



Figure 2-3
Site Plan

2.4.1.1 Density

See Table 2-2 for the density calculation. Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.14 C.3, the maximum residential density within the C zone is one dwelling unit for every 400 square feet of lot area. The property, with 79,623 square feet of lot area, has a base density of 200 dwelling units.

The Project is requesting a TOC Base Incentive Per Tier 3 to allow an increase in number of dwelling units by 70 percent. This would allow 340 dwelling units. The Project proposes 290 dwelling units, of which 10 percent (29 dwelling units) would be reserved for Extremely Low Income (ELI) households.

**Table 2-2
Density**

Zone	Lot Area	Rate	Base	TOC Max (+70%)	Provided
C2	79,623 sf	1 unit / 400 sf	200	340	290
<i>sf = square feet</i> <i>LAMC rounds down, TOC rounds up (TOC Guidelines V.2.a).</i> <i>Source: <u>Plans</u>, SCB, August 16, 2022.</i>					

2.4.1.2 Floor Area

See Table 2-3 for the floor area and floor area ratio (FAR). Under the LAMC, the maximum allowable FAR within the C2 zone and height district 1 is 1.5:1. The Project is requesting a TOC Base Incentive Per Tier 3 to allow an increase in the FAR to 3.75 (297,690 square feet). Of this total, 290,190 square feet would be residential floor area, and 7,500 square feet would be commercial restaurant floor area. The commercial restaurant floor area would be located at the ground floor level of the proposed building.

**Table 2-3
Floor Area**

Zone	Buildable Area	Base		TOC Max		Provided	
		FAR	Floor Area	FAR	Floor Area	FAR	Floor Area
C2	79,623 sf	1.5:1	119,435 sf	3.75:1	298,586 sf	3.75:1	297,690 sf
<i>sf = square feet</i> <i>LAMC rounds down, TOC rounds up (TOC Guidelines V.2.a).</i> <i>Source: <u>Plans</u>, SCB, August 16, 2022.</i>							

2.4.1.3 Setbacks

The setbacks are shown in Table 2-4. The Project is requesting a TOC Additional Incentive, as allowed by the TOC Guidelines. In any Commercial zone, Eligible Housing Developments (such as the Project) may utilize any or all of the yard requirements for the RAS3 zone per LAMC 12.10.5.

**Table 2-4
Setbacks**

Location	Allowable	Provided
Front yard	0 feet per C2 zone	0 feet
Side yard	0 feet for commercial uses (ground floor), 16 feet for residential (levels 2-28)	0 feet for commercial uses (ground floor), 5 feet for residential (levels 2-28) on south side with TOC Incentive, 30 feet to 46 feet for residential (levels 2-28) on north side
Rear yard	0 feet for commercial uses (ground floor), 20 feet for residential (levels 2-28)	0 feet for commercial uses (ground floor), 15 feet for residential (levels 2-28) with TOC Incentive
<i>Site note: One additional incentive (RAS3 zone setbacks) per the TOC Guidelines taken. Source: Plans, SCB, August 16, 2022.</i>		

2.4.1.4 Height

In the C2 zone and height district 1, maximum building height and stories are not limited. The Site is not subject to the LAMC transitional height limitations based on the distance between the C2-1 zoned subject property and the nearest RW1 or more restrictive zone. The Project building would be 28 stories and 332 feet in height (to the top of the highest parapet but may not include roof appurtenances allowed by the LAMC).

2.4.2 Design and Architecture

See Appendix A of this SCEA for floor plans, elevations, sections, and renderings. The proposed building would be contemporary in design and architecture, designed as an integrated single structure with articulation and variation, consistent with applicable City design guidance. Parking spaces within the building and residential units located within the building have been integrated into the overall architectural theme.

The Project building includes a 3-story podium to house vehicle parking, commercial restaurant space, residential amenities, and an open space roof deck. The podium would have a 15-foot setback from the east property line, a 30-foot setback from the north property line, a 13-foot setback from the sidewalk to the west, and a 5-foot setback from the south property line.

Access to vehicle parking would be through two driveways on La Cienega Boulevard, with one-way ingress at the southern driveway and one-way egress at the northern driveway. One level of subterranean parking would be provided along with three levels of parking on the podium levels.

Restaurant space would be provided on the west side of the building along La Cienega Boulevard.

The podium would be screened on the north and west elevations by a series of plaster parabolic arches that vary in height and width. The roof deck on the fourth floor would be landscaped and include a swimming pool.

A 25-story tower (sitting above the 3-story podium) would be positioned on the northwest corner of the podium. The podium ground level wraps the parking with commercial restaurant uses and

residential lobby and amenity spaces. This would provide maximum activated frontage along La Cienega Boulevard. The tower position maximizes the setback from the residential uses along Alfred Street.

The tower would not be a simple rectangle with right angle/perpendicular facades; rather the north and south vertical faces would be angled inward forming acute angles from the east and west vertical faces. In addition, the roof/skydeck level vertical facades would be curved and tapered so that the roof plan resembles a flower petal shape.

The building's longer elevations would face east and west. Residential entrance to the building and tower would be provided at the northwest corner of the building with the lobby inset from the plane of the west elevation. Residential units would be arranged around a double-loaded corridor with a bank of elevators and stairs at the center of each floor. The tower would almost be entirely glazed with an aluminum frame supporting a curtain wall. Balconies would be inserted within the acute angles of the plane.

The building's ground level would incorporate pedestrian scale uses and design, with a street-fronting commercial storefront along with the residential building entrance all with floor-to-ceiling glazing. In addition, the building's proposed design would architecturally differentiate the base of the building from the residential above including cladding and exposed concrete structural elements.

The building's façade would utilize a variety of materials, including metal, cement plastering, and glass in order to add visual interest through different textures and colors. This variation, along with insets and offsets and street-facing residential windows and storefront glazing at the ground floor, would separate the residential portions of the building from commercial, avoiding a repetitive façade and contributing to neighborhood safety by activating the ground floor and putting more "eyes on the street."

The overall scale of the building would be compatible with the surrounding high-density built environment, which includes the following buildings within a 0.5-mile radius of the Project Site:

- 12-story office building at 8484 Wilshire Boulevard, 2,100 feet north of the Site
- 11-story office building at 8500 Wilshire Boulevard, 2,150 feet north of the Site
- 23-story office building at 6500 Wilshire Boulevard, 2,300 feet northeast of the Site
- 12-story office building at 6505 Wilshire Boulevard, 2,500 feet northeast of the Site
- 19-story office building at 6420 Wilshire Boulevard, 2,550 feet northeast of the Site
- 12-story office building at 6404 Wilshire Boulevard, 2,650 feet northeast of the Site
- 18-story office building at 6380 Wilshire Boulevard, 2,700 feet northeast of the Site

2.4.3 Open Space

A summary of the Project’s open space requirements and open space provided is shown in Table 2-4. The Project is required to provide a minimum of 32,775 square feet of open space and would provide 54,540 square feet of open space on several decks, the roof and in private balconies.

The Project includes an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site.

**Table 2-4
Open Space**

Use	Type	Quantity	Rate	Total (sf)
Required				
< 3 habitable rooms	36 studio units 119 1-bedroom units	155 units	100 sf / unit	15,500
= 3 habitable rooms	39 1-bedroom+den units 88 2-bedroom units	127 units	125 sf / unit	15,875
> 3 habitable rooms	8 penthouse units	8 units	175 sf / unit	1,400
Total				32,775
Provided				
Common and open to the sky			Deck L1	11,230
			Deck L4	34,870
			Deck L28	6,140
			<i>Subtotal</i>	<i>52,240</i>
Private			46 balconies x 50 sf	2,300
Total Provided				54,540
Publicly Accessible Open Space Pocket Park				Approx. 4,500
<i>sf = square feet</i> <i>Per LAMC 12.21.G</i> <i>Habitable Room - An enclosed subdivision in a residential building commonly used for living purposes, but not including any lobby, hall, closet, storage space, water closet, bath, toilet, slop sink, general utility room or service porch. A recess from a room or an alcove (other than a dining area) having 50 square feet or more of floor area and so located that it could be partitioned off to form a habitable room, shall be considered a habitable room.</i> <i>For the purpose of applying the open space requirements of Section 12.21 G., a kitchen as defined herein shall not be considered a habitable room.</i> <i>A studio and 1 bedroom units have less than 3 habitable rooms. A 2 bedroom has 3 habitable rooms. A penthouse is identified as greater than 3 habitable rooms.</i> <i>Source: Plans, SCB, August 16, 2022.</i>				

2.4.4 Landscaping

Per LAMC Section 12.21.G.2.a.3, a minimum of 25 percent of the required common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway.

Accordingly, the Project would be required to provide a minimum approximately 8,193 square feet of landscape open space. The Project would provide 20,647 square feet of landscaped common open space the ground floor, Level 4, and Level 28 (roof).

At the northern end of the Site, the Project incorporates an approximately 4,500 square-foot publicly accessible open space plaza with pedestrian walkway and seating area, landscaping, hardscape elements.

The Project would be required to provide at least 73 trees (290 units / 4 trees). The Project would provide 80 trees as follows:²⁰

- Level 1: 15 trees
- Level 2: 2 trees
- Level 3: 2 trees
- Level 4: 56 trees
- Level 28: 5 trees

The Project would comply with LAMC requirements for trees and landscaping.

The Project would remove at least one street tree on La Cienega Boulevard adjacent to the Project Site, although it is possible that all four street trees could be removed.

Reasons for potential street tree removal include: damage to sidewalk/curb/driveway that cannot be repaired without tree removal, installation of driveway that cannot be relocated, and development public improvements conditions requiring street tree removal.²¹

Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, the analysis provided is the worst-case potential for removal of all street trees. Note that street trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The Project proposes to remove zero (0) protected trees, zero (0) protected shrubs, and up to four (4) street trees.

Any on-site tree removal will comply with the City's Tree Replacement Program, and any removal and replacement of street trees in the public right-of-way will be to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio. If all four street trees are

²⁰ [Plans](#), SCB, August 16, 2022.

²¹ Urban Forestry Division, Bureau of Street Services: <https://streetsla.lacity.org/faqs-ufd>

removed, eight would be required to be planted. The landscape plans (Appendix A, Sheet L1.01) show eight street trees along La Cienega Boulevard.

2.4.5 Access and Circulation

The Project Site currently has seven curb cuts along La Cienega Boulevard. These curb cuts would be consolidated to two curb cuts along La Cienega Boulevard: one exit-only driveway along the mid-western portion of the Site and one entrance-only driveway along the southwest corner of the Site. Interior circulation would provide access to subterranean parking level 1.

Pedestrian access to the restaurant use would be located on La Cienega Boulevard. The residential lobby would be accessed on La Cienega Boulevard.

2.4.6 Trash/Recycling Collection, Rooftop Equipment, and Loading Areas

The Project is designed to minimize the visual impact of trash receptacles and loading areas. Trash/recycling, utilities, storage, and loading spaces would be located within the podium and enclosed and/or screened and would not be visible from off-site locations.

Rooftop equipment, such as heating, cooling, and air conditioning (HVAC) units, would be set back from the roof parapet edge and appropriately screened from public view.

The loading area for the commercial uses would be provided at grade within the podium and would be accessed from La Cienega Boulevard.

2.4.7 Vehicle Parking

Table 2-5 provides the amount of required and provided vehicle parking. The Project is requesting a TOC Base Incentive Per Tier 3 to allow reduced parking for a total of 145 residential spaces required. The Applicant is requesting a TOC Base Incentive Per Tier 3 to reduce non-residential parking by up to 30 percent.

The Project would include a total of 426 parking spaces in one subterranean level, and above grade Level 1, Level 2, and Level 3. There would be 373 residential spaces and 53 commercial spaces.

**Table 2-5
Vehicle Parking**

Use	Quantity	TOC Required		Provided
		Minimum Rate	Amount	
Residential	290 units	0.5 space / unit	145	373
Commercial	7,500 sf	1 space / 100 sf	75	53
		TOC Reduction (30%)	(22)	
Total			198	426
<i>Per LAMC 12.22 A.4 and TOC Guidelines. Source: Plans, SCB, August 16, 2022.</i>				

2.4.7.1 Electric Vehicle Parking

According to LAMC Section 99.04.106.4.2, where multi-family dwelling units and other "R" occupancies are constructed on a building site and parking is available, 30 percent of the total number of parking spaces provided, but in no case less than one space, shall be electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE). Calculations for the required number of EV spaces and electric vehicle charging stations (EVCS) shall be rounded up to the nearest whole number. LAMC Section 99.05.106.5.3.3 applies to non-residential uses and has the same 30 percent EVSE requirements.

Additionally, according to LAMC Section 99.04.106.4.4, the number of EVCS shall be 10 percent of the total number of parking spaces provided for all new multi-family dwelling units, other "R" occupancies, hotels, and motels. Calculations for the number of required EVCS shall be rounded up to the nearest whole number. The number of EVCS can be counted towards the total number of EV spaces required for the building required per Subsections 99.04.106.4.2 and 99.04.106.4.3.1. LAMC Section 99.05.106.5.3.6 applies to nonresidential uses and has the same 10 percent EVCS requirements.

In compliance with LAMC requirements, the Project would provide 128 EV spaces with EVSE, of which 43 EV spaces with EVCS.

2.4.8 Bicycle Parking

LAMC 12.21.A.16(a) requires new projects to provide bicycle parking spaces. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather.

Table 2-6 shows the amount of required and provided bicycle parking. The Project would provide a total of 184 bicycle parking spaces, including 20 short-term spaces and 164 long-term spaces.

**Table 2-6
Bicycle Parking**

Use	Quantity	Short-Term Spaces			Long-Term Spaces		
		Rate	Required	Provided	Rate	Required	Provided
Residential	1-25 units	1 / 10 unit	2.5	16	1 / 1 unit	25	160
	26-100 units	1 / 15 units	5		1 / 1.5 units	50	
	101-200 units	1 / 20 units	5		1 / 2 units	50	
	201+ units	1 / 40 units	2.25		1 / 4 units	22.5	
<i>Subtotal</i>			15	16	<i>Subtotal</i>	147	160
Commercial	7,500 sf	1 / 2,000 sf	3.75	4	1 / 2,000 sf	3.75	4
Total			19	20		151	164
<p><i>LAMC Table 12.21 A.16 (a)(1)(i) and Ordinance No. 185,480. A minimum of two short-term bicycle parking spaces shall be provided in all cases. Per LAMC Section 12.21.A.16(b): When the application of these regulations results in the requirement of a fractional bicycle space, any fraction up to and including one-half may be disregarded, and any fraction</i></p>							

over one-half shall be construed as requiring one bicycle parking space.
Source: *Plans, SCB, August 16, 2022.*

2.4.9 Lighting and Signage

Project signage would include building identification, wayfinding, and security markings. Signage would be similar to other signage in the Project Site's vicinity. No off-site signage is proposed.

Exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting would be integrated into the overall architecture and landscaping.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot candles above ambient lighting; and limited exterior lighting to no more than two foot candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

2.4.10 Site Security

The Project would provide a security program to ensure the safety of its residents, employees, and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas; lighting of building entryways and areas; and possible video surveillance. The security program would include access control; monitoring of entrances and exits of buildings; monitoring of fire/life/safety systems; and security lighting.

2.4.11 Sustainability Features

The Project would at minimum comply with the applicable Los Angeles Green Building Code (LAGBC, 2020 version effective January 1, 2020)²² and the applicable California Green Building Standards Code (CalGreen, 2022 version effective January 1, 2023).²³ The applicability is determined when the Project is submitted and accepted by plan check.

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient

²² City of Los Angeles Department of Building and Safety, Green Building, available at <http://ladbs.org/forms-publications/forms/green-building>, accessed on May 10, 2022.

²³ California Building Codes: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>, accessed on July 1, 2022.

landscape design.

In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate possible stormwater retention on-site.

Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project would provide EV spaces.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for residents and visitors.

2.4.12 Anticipated Construction Schedule

The estimated construction schedule is shown in Table 2-7. The estimated operational year is 2026. For a conservative assumption, the Project includes excavation to a depth of approximately 15 feet for subterranean parking, foundation elements, and grading of soils. No fill would be imported to the Site. The amount of materials exported would be up to approximately 48,913 cubic yards. Export would be deposited at a landfill in Irwindale, approximately 40 miles from the Site (one-way).

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes.

Table 2-7
Approximate Construction Schedule

Phase	Schedule	Duration
Excavation	January 2023 – April 2023	4 months
Pile Installation	May 2023 – June 2023	2 months
Building Construction	July 2023 – May 2025	22 months
Architectural Coatings	January 2025 – August 2025	8 months

Estimates provided by the Applicant, March 2022.

2.4.13 Discretionary Requests

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to LAMC Section 12.22 A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), approval of a 290-unit Tier 3 TOC development that would set aside 10 percent (29 units) of the Project's total number of units for Extremely Low Income households and would utilize the following Base and Additional Incentives:

Base Incentives

- a. Up to 70 percent increase in density (TOC Guidelines, Section VI.1.a.iii)
- b. 0.5 minimum required parking spaces for residential units (TOC Guidelines, Section VI.2.a.i.4)
- c. 30 percent parking reduction for nonresidential (TOC Guidelines, Section VI.2.e.iii)
- d. FAR of a 3.75:1 in a commercial zone. (TOC Guidelines, Section VI.1.b.iii)

Additional Incentives

- e. Utilize any or all of the yard requirements for the RAS3 zone per LAMC 12.10.5 (TOC Guidelines, Section VII.1.a.i)
2. Pursuant to LAMC Sections 16.05.C and 16.05.D, site plan review for a project for which by-right units minus existing units is greater than 50 units.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, excavation permits, foundation permits, building permits, street tree removal permits, and sign permits.

2.5 Related Projects

In this SCEA, cumulative impact analyses are provided for each environmental issue discussed in Section 5 (Sustainable Communities Environmental Impact Assessment) and can be found in each respective subsection of Section 5.²⁴

Table 2-8 lists 14 reasonably foreseeable related projects within a 0.5-mile radius of the Project Site that were considered in the cumulative impact analyses. The locations are shown in the Transportation Assessment.²⁵

The list of Related Projects is based on information provided by Department of City Planning and Los Angeles Department of Transportation (LADOT) in January 2022, as well as on recent studies of development projects in the Project Site area. Based on a review of available information in April 2022, no Related Projects in the City of Beverly Hills were identified within a 0.5-mile radius of the Project Site. The location of the Related Projects is included as Figure 2-4 below.

²⁴ Pursuant to Public Resources Code Section 21155.2(b)(1), the SCEA is required to identify all significant or potentially significant impacts of a TPP through the preparation of an initial study, other than growth inducing impacts or specific or cumulative impacts from cards and light-duty trucks trips consistent with Section 21159.28, based on substantial evidence in light of the whole record. The Initial Study Checklist for the Project is attached hereto in Section 4 of this SCEA. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs.

²⁵ Figure 9, Transportation Assessment, Gibson Transportation Consulting, June 2022.

**Figure 2-4
Locations of Related Projects**



**Table 2-8
Related Projects List**

No.	Land Use/Description	Size	Units	Address
1	Residential Retail Restaurant	3,100 sf 2,000 sf	124 units	5935 Pico Boulevard
2	Residential Retail	14,000 sf	100 units	6132 Pico Boulevard
3	Residential Retail	4,140 sf	125 units	6055 Pico Boulevard
4	Medical Office Retail	140,305 sf 5,000 sf		656 San Vicente Boulevard
5	Hotel Residential Restaurant Retail	3,800 sf 2,500 sf	110 rooms 45 units	6075 Pico Boulevard
6	Eldercare		56 units	843 Sherbourne Drive
7	Residential		9 units	1233 Bedford Street
8	Eldercare		80 units	825 Holt Avenue
9	Residential Commercial	3,000 sf	65 units	1415 Robertson Boulevard
10	Residential		15 units	1049 Holt Avenue
11	Residential		12 units	1047 Corning Street
12	Residential Commercial	1,098 sf	30 units	1255 La Cienega Boulevard
13	Residential		14 units	911 Shenandoah Street
14	Residential Commercial	1,000 sf	48 units	6001 Pico Boulevard
<i>sf = square feet</i>				
<i>Source: <u>Transportation Assessment</u>, Gibson Transportation Consulting, June 2022.</i>				

The related projects include the following uses:

- 723 residential units (including apartments, condominiums, and eldercare spaces)
- 33,838 square feet of retail and commercial space
- 5,800 square feet of restaurant space
- 140,305 square feet of medical office space
- 110 hotel rooms

The nearest related projects (within 1,000 feet of the Site) are:

- No. 11, 1047 Corning Street, 410 feet west of the Site.
- No. 10, 1049 Holt Street, 715 feet west of the Site.

2.6 Project Design Features

The following Project Design Feature (PDF) is included as part of the Project:

PDF-TRANS-1 Construction Traffic Management Plan

Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;
- Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways;
- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Contain construction activity within the Project Site boundaries;

- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.

3 SCEA FINDINGS AND CONSISTENCY

3.1 CONSISTENCY WITH TRANSIT PRIORITY PROJECT CRITERIA

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

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

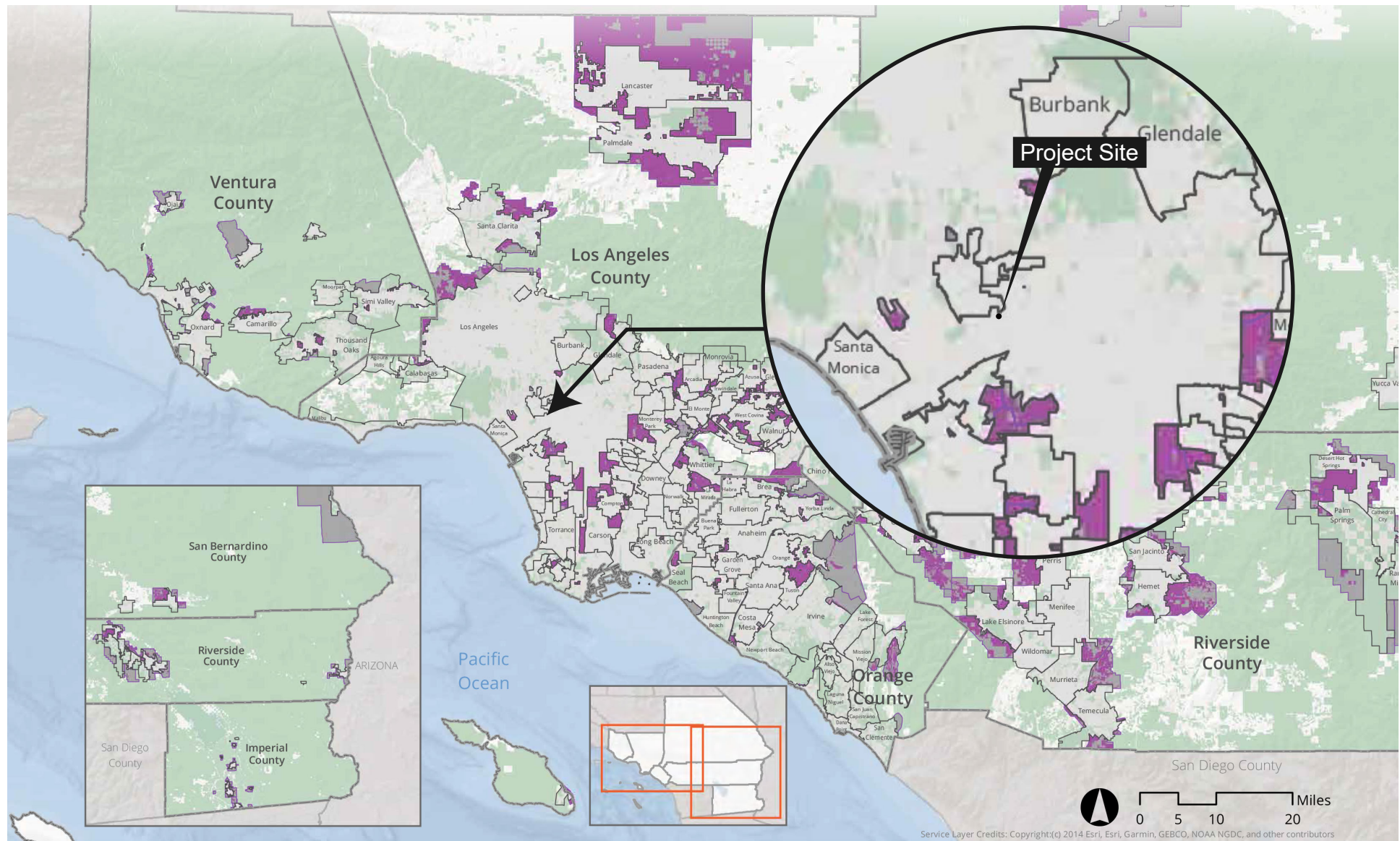
Consistency with Criterion #1 – The Project is consistent with the general use designation, density, and building intensity and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy.

The Southern California Association of Government’s (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related greenhouse (GHG) emissions reductions through increasing transportation choices aimed at triggering reduced dependence on automobiles and increased growth in walkable, mixed-use communities and High Quality Transit Areas (HQTAs), and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting the implementation of

sustainability policies, and promoting a green region. As a land use tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where these land use strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas, High Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence. These PGAs account for only four percent of the region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.

The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.4 through 3.10, which are included in this SCEA as Figures 3-1 through 3-6. As shown in the figures, the Project Site is located adjacent to a Job Center; within the boundaries of a TPA, an HQTA, a Neighborhood Mobility Area; and along a Livable Corridor. Accordingly, the Project would be consistent with the general use designation, density, and building intensity set forth in the 2020-2045 RTP/SCS for each of these types of PGA.

- Job Centers: Areas with denser employment than their surroundings. The Project would be located near several Job Centers including those located in Beverly Hills, Culver City, Hollywood, and Downtown Los Angeles. The 2020-2045 RTP/SCS prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.
- Transit Priority Areas (TPAs): Areas within one-half mile of a major transit stop that is existing or planned. According to the 2020-2045 RTP/SCS, focusing regional growth in areas with planned or existing transit stops is key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports the 2020-2045 RTP/SCS's strategies for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation. The Project is in close proximity (within ½ mile) of three Major Transit Stops: Wilshire Boulevard and La Cienega Boulevard (future Metro D Line subway), Olympic Boulevard and La Cienega Boulevard (Metro Lines 105 and 28, and Pico Boulevard and La Cienega Boulevard (Metro Line 105 and BBB Line 7).

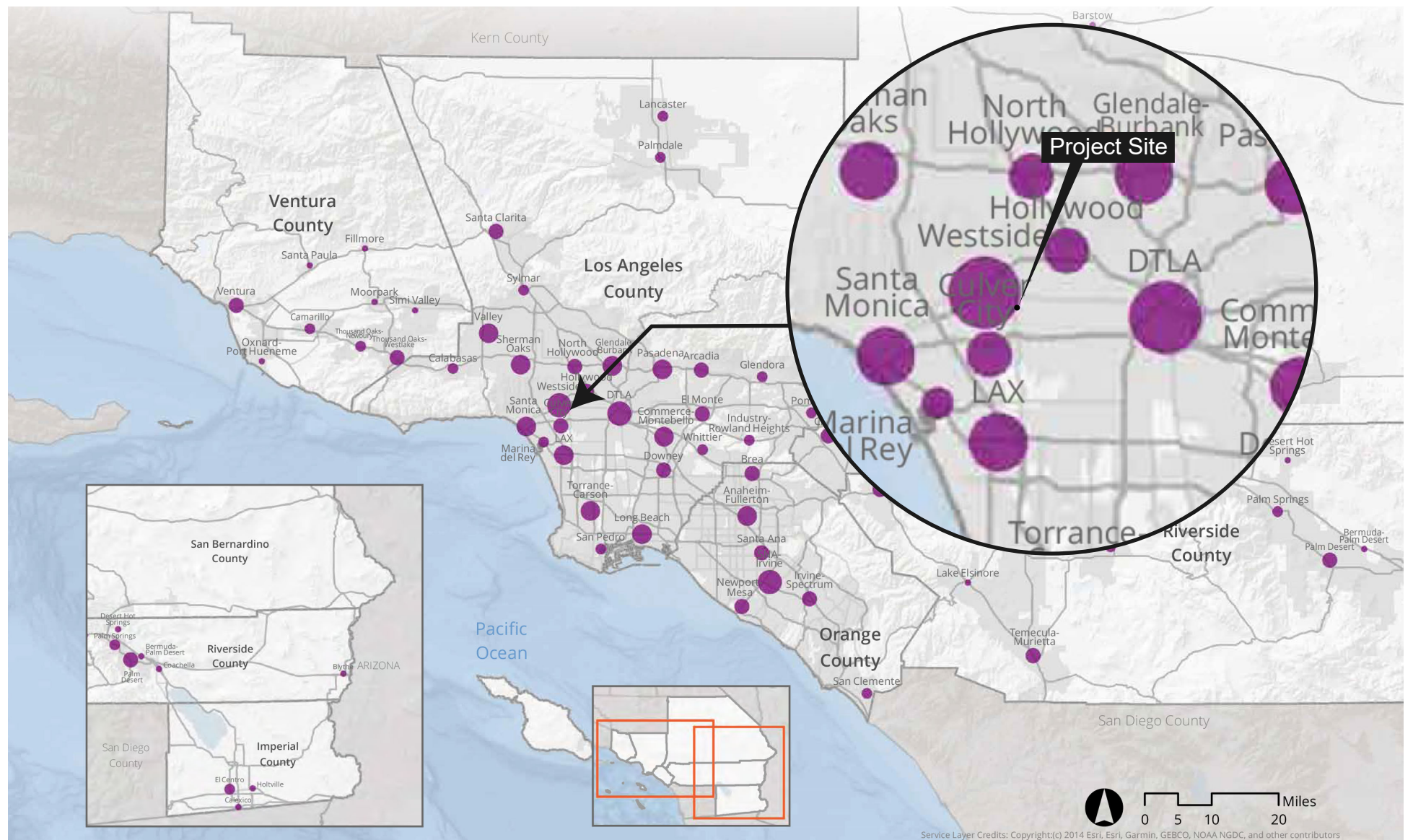


- County Boundaries
- Sphere of Influence
- City Boundaries
- Regional Growth Constraints

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

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

Figure 3-1
Priority Growth Areas - Spheres of Influence



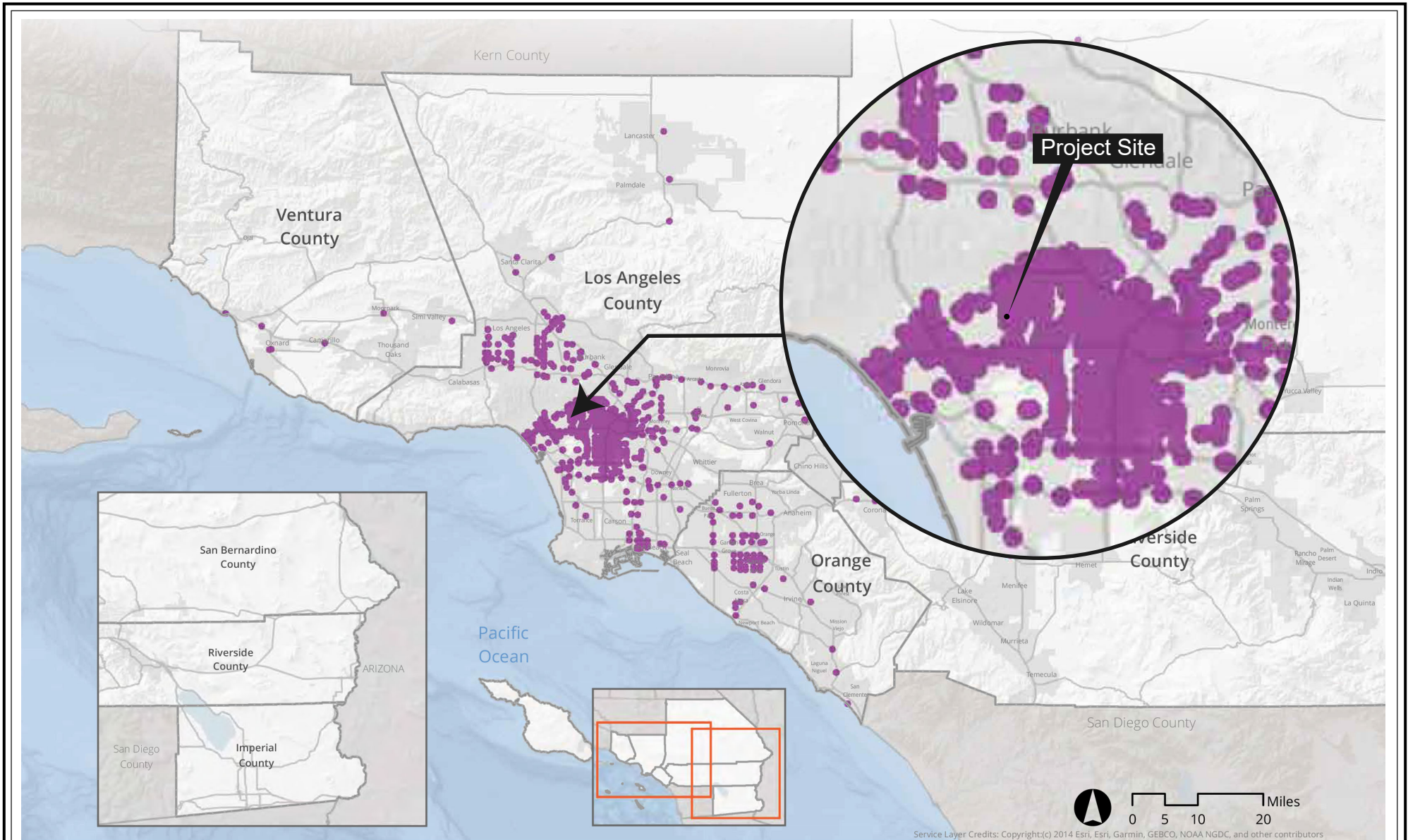
SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

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

Source: SCAG, 2019

Notes:

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

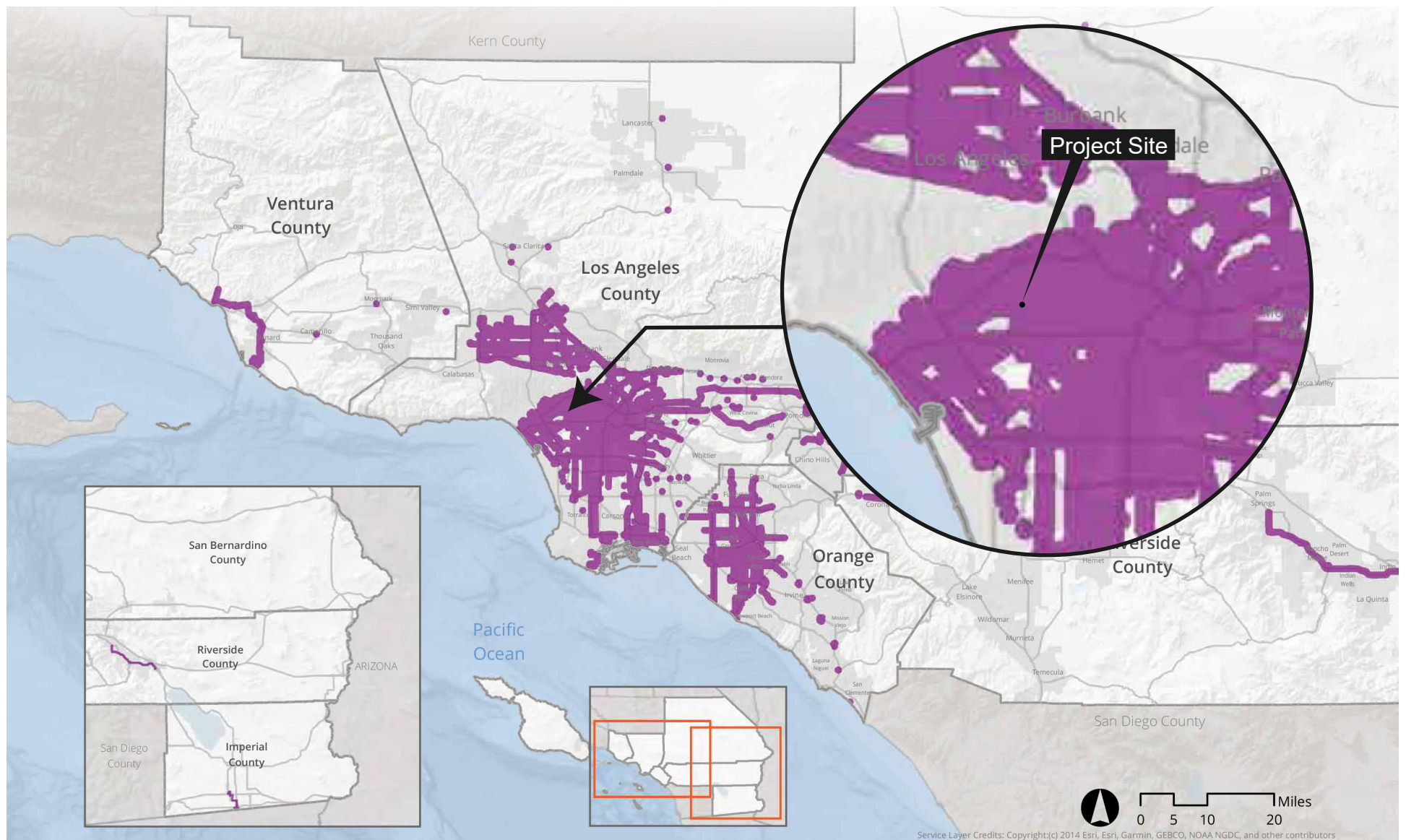


Transit Priority Areas (2045)

■ TPA

Source: County Transportation Commissions, SCAG, 2019

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

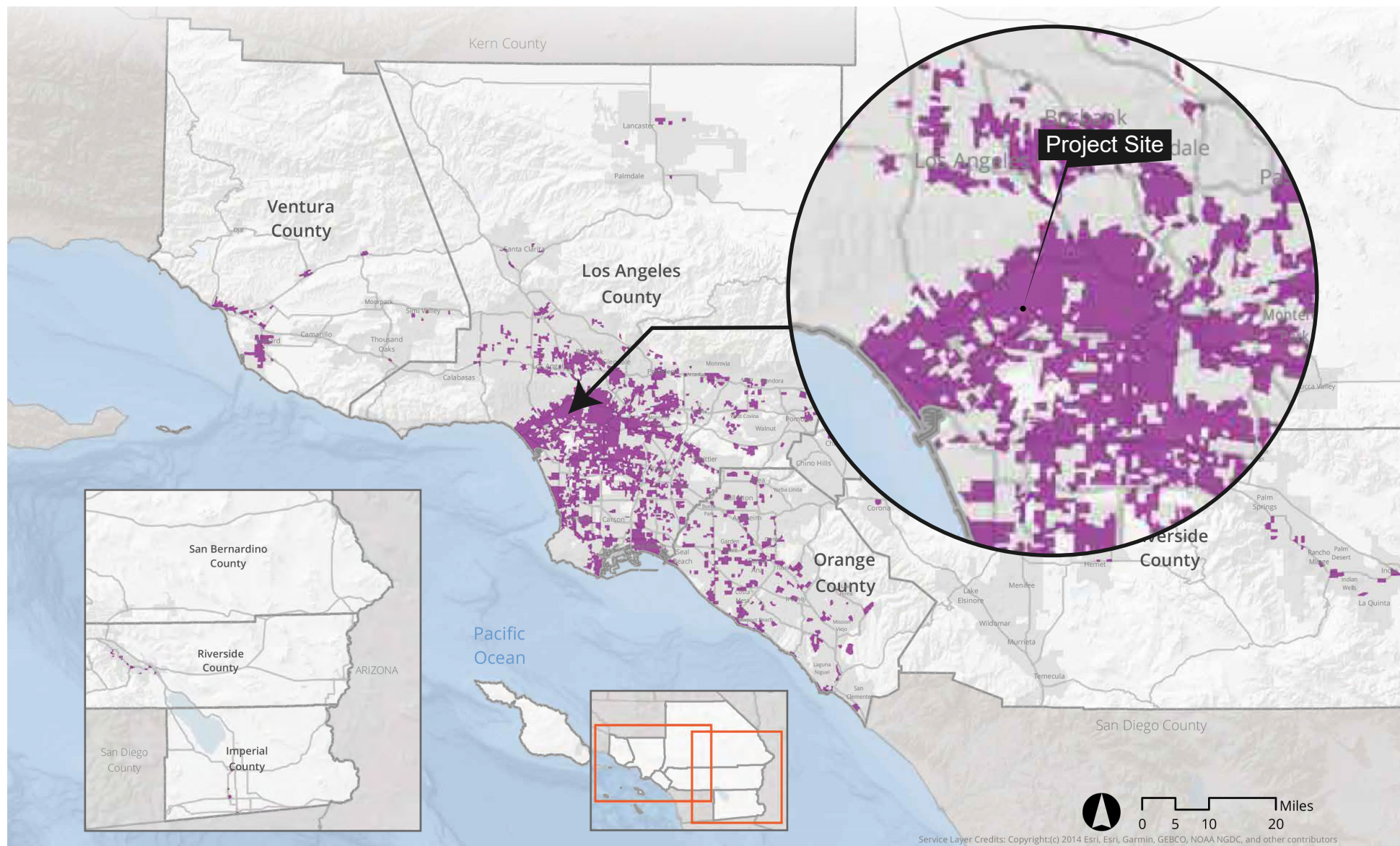


High Quality Transit Areas (2045)

■ HQTA

Source: County Transportation Commissions, SCAG, 2019

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

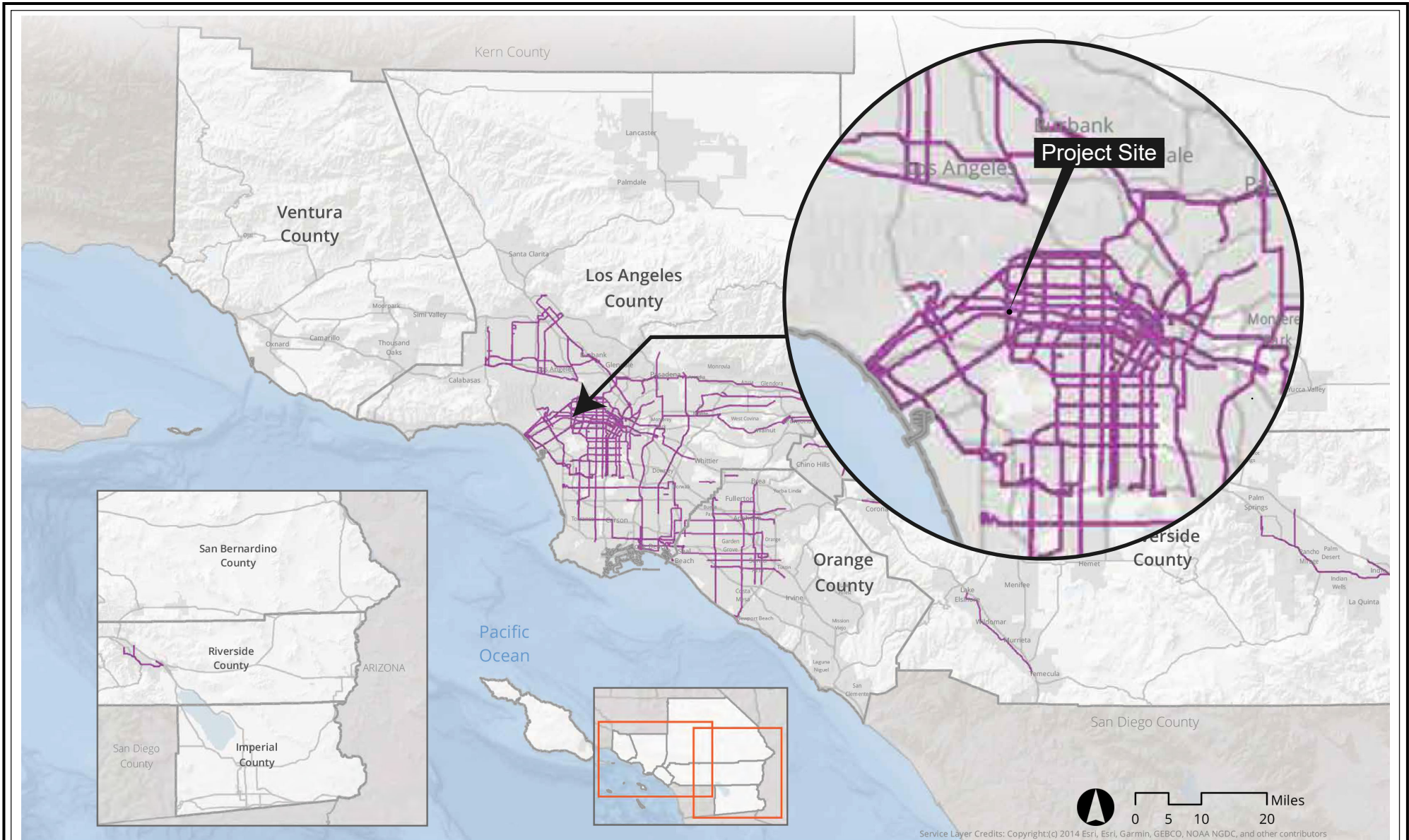


Neighborhood Mobility Areas (NMA)

■ NMA

Source: SCAG, 2019

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



Livable Corridors

— Livable Corridors

Source: SCAG, 2019

Source: Connect SoCal, April 2022.

Figure 3-6
Priority Growth Area - Livable Corridors

- High Quality Transit Areas (HQTAs): Areas within one-half mile from major transit stops and high quality transit corridors. Like TPAs, HQTAs are places where vibrant TOD can be realized and are a cornerstone of land use planning best practice in the SCAG region. Infrastructure investments that support walkable, compact communities that integrate land use and transportation planning for a better functioning built environment are essential within HQTAs. New developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of housing choices. The Site qualifies as within a HQTAs because Metro bus line 105 (along La Cienega Boulevard), Metro bus line 28 (along Olympic Boulevard), BBB line 7 (along Pico Boulevard), and the future Metro D subway Line (along Wilshire Boulevard) are the qualifying rail service or bus service where lines have peak headways of less than 15 minutes, as demonstrated in their schedules described in Section 2 (Project Description).
- Neighborhood Mobility Areas (NMAs): These areas focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging “walkability,” active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to “walkable” and destination-rich neighborhoods to more people in the future.
- Livable Corridors: Livable Corridor land-use strategies include development of mixed use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a “Complete Streets” approach to roadway improvements and zoning that allows for the replacement of underperforming auto-oriented strip retail between nodes with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.

The Project would construct housing and neighborhood-serving commercial uses on an infill site near transit and sources of employment, shopping, entertainment, and housing. The Project Site is located within specifically designated areas identified in the 2020-2045 RTP/SCS as PGAs, and the Project would significantly increase the housing supply in the Project Site area. The Project would also increase housing diversity and affordability in the PGA in which the Project Site is located.

Of the Project’s 290 proposed dwelling units, 29 units would be set aside for rental to households qualifying at the Extremely Low Income level. Given the urban nature of the Project Site area,

Project residents and employees would be able to walk and bike to work and to shop. In addition, the Project Site’s location near robust transit opportunities (including multiple bus lines with high frequency service along La Cienega, Pico Boulevard and Olympic Boulevard and the future Metro D Line) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.

Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site as well as an approximately 4,500 square-foot publicly accessible pocket park located at the north portion of the Project Site. The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood.

Additionally, the Project would include approximately 184 bicycle parking spaces (20 short-term and 164 long-term), which would encourage bicycling as a form of exercise and transportation. This type of transit-oriented mixed-use project helps to reduce both dependence on automobile travel and mobile-source GHG emissions. Thus, the Project is consistent with SCAG’s land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the 2020-2045 RTP/SCS’s goals, policies and benefits for land use, density, and intensity of development.

Further, as discussed in Table 3-1 and 3-2, the Project would be substantially consistent with the applicable goals and guiding principles and strategies (respectively) of SCAG’s 2020-2045 RTP/SCS.

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	Not Applicable. This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing and neighborhood-serving commercial restaurant uses near other commercial, office, and cultural uses in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by providing housing and supportive commercial uses. The Project is also siting market rate and affordable housing near multiple identified RTP/SCS Job Centers.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. The Project Site is located in a highly urbanized area of the City and would develop 290 multi-family residential units and approximately 7,500 square feet of commercial restaurant land uses within an HQTAs and along a Livable Corridor near multiple Job Centers, as defined by SCAG, and within a TPA as defined by SB 743, and also in close

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
	<p>proximity to existing and proposed residences and commercial opportunities. Also, the Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access.</p> <p>In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the Site Plan Review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.</p>
<p>Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.</p>	<p>Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.</p>
<p>Goal 4 Increase person and goods movement and travel choices within the transportation system.</p>	<p>Consistent. The Project would construct market rate and affordable housing and commercial uses near other commercial, office, and cultural uses and multiple identified Job Centers. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment. In addition, the Project Site's location near robust transit opportunities (high frequency bus service along La Cienega, Pico Boulevard and Olympic Boulevard and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.</p> <p>Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>At the northern end of the Site accessed from La Cienega Boulevard, the Project incorporates an approximately 4,500 square-foot publicly accessible</p>

**Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
	<p>open space plaza with pedestrian walkway and seating area, landscaping, hardscape elements.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 164 long-term bicycle parking stalls and 20 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation.</p>
<p>Goal 5 Reduce greenhouse gas emissions and improve air quality.</p>	<p>Consistent. The Project would construct market rate and affordable housing and commercial restaurant uses near other commercial, office, and cultural uses and multiple designated Job Centers. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment. In addition, the Project Site's location near robust transit opportunities (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.</p> <p>Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>There would also be an approximately 4,500 square-foot publicly accessible pocket park on the north portion of the Site, accessible from La Cienega Boulevard.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 164 long-term bicycle parking stalls and 20 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation.</p>
<p>Goal 6 Support healthy and equitable communities.</p>	<p>Consistent. The Project would construct housing, and commercial restaurant uses near other commercial, office, and cultural uses and add to housing diversity. Of the 290 proposed dwelling units, 29 of the units would be set aside for rental to households qualifying at the Extremely Low Income</p>

**Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
	<p>level (i.e., households earning at or below 30% of the Area Median Income).</p> <p>Given the urban nature of the Project Site area, and location near Job Centers, Project residents and employees would be able to walk and bike to work, shopping, and entertainment uses. In addition, the Project Site's location near robust transit opportunities (high frequency bus lines along La Cienega, Pico and Olympic Boulevards and the future Metro D Line) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.</p> <p>Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>There would also be an approximately 4,500 square-foot publicly accessible pocket park on the north portion of the Site, accessible from La Cienega Boulevard.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 164 long-term bicycle parking stalls and 20 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation and exercise.</p>
<p>Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p>Consistent. The Project includes development of mixed residential (market rate and affordable) and commercial restaurant uses on an infill site in an urbanized area of the City that is near several sources of transit and Job Centers. Also, the Project includes pedestrian improvements and 184 bicycle parking spaces. This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.</p>
<p>Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.</p>	<p>Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.</p>

**Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent. The Project includes development of 290 residential units, in addition to ground floor commercial uses. Of the 290 proposed units, 29 of the units would be set aside for rental to households qualifying at the Extremely Low Income level (i.e., households making at or below 30% of the Area Median Income).
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	Not Applicable. This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS, 2020.	

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
Focus Growth Near Destinations & Mobility Options	
<p>Strategy: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.</p>	<p>Consistent. The Project would construct housing and neighborhood-serving commercial restaurant uses near existing sources of employment, shopping, entertainment, and robust transit opportunities (i.e., high frequency bus lines along La Cienega, Olympic and Pico Boulevards and the future Metro D line).</p> <p>Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>There would also be an approximately 4,500 square-foot publicly accessible pocket park on the north portion of the Site, accessible from La Cienega Boulevard.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood.</p> <p>Also, the Project would include approximately 164 long-term bicycle parking stalls and 20 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation. Project users would have multiple sources of access to local destinations.</p>
<p>Strategy: Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit, employment (i.e., Job Centers), shopping, and entertainment. Also, the Project includes pedestrian improvements and 184 bicycle parking spaces. This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce commute times.</p>
<p>Strategy: Plan for growth near transit investments and support implementation of first/last mile strategies.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit, including the future Metro D line. Also, the Project includes pedestrian improvements and 184 bicycle parking spaces. The Project's inclusion of pedestrian amenities and bicycle parking would support implementation of first/last mile strategies for people traveling to and from the Project</p>

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	Site from the existing bus lines or the future Metro D Line.
<p>Strategy: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit, including high frequency bus lines and the future Metro D line. The Project’s redevelopment of the Site would allow for the inclusion of additional needed residential units to be constructed, including 29 units reserved for Extremely Low Income households.</p>
<p>Strategy: Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit, including high frequency bus lines along La Cienega, Pico and Olympic Boulevards and the future Metro D line.</p> <p>Project residents and guests would have access to a 2,663-square-foot residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>There would also be an approximately 4,500 square-foot publicly accessible pocket park on the north portion of the Site, accessible from La Cienega Boulevard.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood. Additionally, the Project would include approximately 164 long-term bicycle parking stalls and 20 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation as another form of connectivity with the existing neighborhood.</p>
<p>Strategy: Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).</p>	<p>Consistent. The Project’s location near several sources of transit, including the future Metro D line, would reduce reliance of the automobile and solo car trips. Also, the Project includes pedestrian improvements and 184 bicycle parking spaces, which would further reduce reliance on the automobile, VMT, and associated pollutant emissions. The Project would also include various Transportation Demand Management (TDM) strategies to encourage multi modal transportation and reduced VMT such as</p>

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	reduced parking (below typical LAMC residential and restaurant parking ratios) and unbundling parking from the residential leases.
<p>Strategy: Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).</p>	<p>Consistent. The Project includes 405 vehicle parking spaces for the residential and approximately 21 vehicle parking spaces for the commercial uses. Parking would be unbundled from residential leases. Of these parking spaces, 30 percent would be electric vehicle (EV) spaces 10 percent of which would be full EV installed. Also, the Project includes 184 bicycle parking spaces.</p>
<p>Promote Diverse Housing Choices</p>	
<p>Strategy: Preserve and rehabilitate affordable housing and prevent displacement.</p>	<p>Consistent. The Project Site no existing housing units. Therefore, there is no need for tenant relocation assistance pursuant to the City’s Rent Stabilization Ordinance and Ellis Act regulations.</p> <p>The Project would provide 290 multi-family residential units, including 29 Extremely Low Income affordable housing units, resulting in an increase of both total residential units and restricted affordable units at the Project Site. Extremely Low Income units provide the deepest affordability level and benefit among the various types of deed restricted affordable units (i.e., Very Low, Low and Moderate Income) and are only available for households earning at or below 30% of the Area Median Income.</p>
<p>Strategy: Identify funding opportunities for new workforce and affordable housing development</p>	<p>Consistent. Although the Project is not responsible for identifying funding opportunities for a new workforce, the Project does include 7,500 square feet of commercial restaurant uses, which would provide employment for approximately six people. Also, of the 290 proposed residential units, 29 of the units would be set aside for rental to households qualifying at the Extremely Low Income level without any public subsidy.</p>
<p>Strategy: Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.</p>	<p>Not Applicable. This strategy is directed to jurisdictions/agencies that can create incentives and have control over regulations.</p>
<p>Strategy: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.</p>	<p>Consistent. Although the Project has no control over the City’s policy making, the Project does include development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit, including the future Metro D line. Also, the Project includes pedestrian improvements and 184 bicycle parking</p>

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	spaces. This type of transit-oriented mixed-use project supports growth near transit as a way to reduce reliance on the automobile, VMT, and associated pollutant emissions.
Leverage Technology Innovations	
Strategy: Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	Consistent. The Project would include 184 bicycle parking spaces. Also, 30 percent of the Project’s vehicle parking spaces would be EV spaces.
Strategy: Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.	Not Applicable. Although this strategy is not applicable to the Project, the Project would not inhibit its implementation.
Strategy: Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	Not Applicable. As a predominantly infill residential development the Project has no authority to develop sources of power.
Support Implementation of Sustainability Policies	
Strategy: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies. However, the Project’s provision of both residential and commercial uses near multiple Job Centers and robust transit options, including multiple high frequency bus lines and the future Metro D Line, would allow Project residential, employees, and guests to be able to walk or bike to work, shopping, or entertainment uses, thereby reducing VMT and greenhouse gas emissions.
Strategy: Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies. However, the Project involves the development of residential and commercial uses within an HQTAs and in close proximity to the future Metro D Line Wilshire/La Cienega Station.
Strategy: Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Work with local jurisdictions/communities to identify	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.

**Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy**

Strategy	Project Consistency Assessment
opportunities and assess barriers to implement sustainability strategies.	
Strategy: Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Continue to support long range planning efforts by local jurisdictions.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Promote a Green Region	
Strategy: Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Integrate local food production into the regional landscape.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Promote more resource efficient development focused on conservation, recycling and reclamation.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Preserve, enhance and restore regional wildlife connectivity.	Consistent. The Project is an infill development in an urbanized area and would not interfere with regional wildlife connectivity.
Strategy: Reduce consumption of resource areas, including agricultural land.	Consistent. The Project is an infill development in an urbanized area would not affect any agricultural land.
Strategy: Identify ways to improve access to public park space.	Consistent. The Project is an infill development in an urbanized area would not interfere with access to public park space.
Source: 2020-2045 RTP/SCS, 2020.	

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

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

The Project includes the construction of approximately 297,690 square feet of floor area, and based on total square footage, the Project contains approximately 97 percent residential uses. As such, the Project would be consistent with this criterion.

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

Criterion 2(b) requires that a project “Provides a minimum net density of at least 20 units per acre.” The proposed density of the Project is approximately 158 residential dwelling units per acre (290 units on approximately 1.83 acres). As such, the Project would be consistent with this criterion.

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

Criterion 2(c) requires that a project “Is located within one-half mile of a major transit stop or high-quality transit corridor included in the RTP/SCS.

PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

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

The Project meets both of the definitions to qualify for this criterion. The Project Site is located in an urban area served by multiple local bus lines operating with service intervals of 15 minutes or less during morning and afternoon peak commute periods along corridors in close proximity to the Project Site, including Pico Boulevard, La Cienega Boulevard and Olympic Boulevard.

Specifically, Metro Line 105 line runs along La Cienega Boulevard, while Metro Line 28 runs along Olympic Boulevard. Other nearby transit routes include BBB Line 7 and Rapid 7 on Pico Boulevard. Transfer opportunities are available to/from the Project area by these local and regional transit lines. Therefore, the Project Site is located within one-half mile of a high-quality transit corridor.

In addition, Metro is currently constructing the extension of the D Line (formerly Purple Line) subway system from its existing western terminus near Wilshire Boulevard and Western Avenue into the Westwood community of the City of Los Angeles near the Veterans Administration (VA) Hospital campus. The first phase of construction, extending the D Line through the immediate Project area to near the intersection of Wilshire Boulevard and La Cienega Boulevard, is scheduled to begin operations in 2024, and would include a new station at Wilshire Boulevard and La Cienega Boulevard. Metro’s D line extension and the Wilshire/La Cienega station are identified in the 2020-2045 RTP/SCS. Therefore, the Project is also located within one-half mile of a major transit stop.

4 MITIGATION MEASURES FROM PRIOR EIRS

4.1 Incorporation of Applicable Mitigation Measures from Prior EIRs

Public Resources Code (PRC) Section 21151.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior EIRs applicable to the Project include SCAG’s 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Program EIRs.

The Mitigation Monitoring and Reporting Program for the 2020-2045 RTP/SCS Program EIR (SCAG MMRP) includes programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

As stated by SCAG, SCAG has no authority to impose mitigation measures on individual projects for which it is not the lead agency. However, for projects seeking to use CEQA streamlining and/or to tier from the Program EIR, project-level mitigation measures included in the Program EIR (or comparable measures) should be required by the local lead agency as appropriate and feasible. Many lead agencies have existing regulations, policies, and/or standard conditions of approval that address potential impacts. Nothing in the Program EIR is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency’s independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the Program EIR, as appropriate, to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

To comply with PRC Section 21151.2, the City of Los Angeles (City) has reviewed all mitigation measures contained in the SCAG MMRP (refer to Table 4-1) and determined their applicability to the Project. For each such mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG’s Program EIR or whether an equally effective existing City mitigation measure, standard condition of approval, or other City regulation or federal, state, or regional regulation would supersede SCAG’s mitigation measures. A discussion of the City’s applicability determination is found in Table 4-1.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impacts and Mitigation Measure	Applicability to the Project
AESTHETICS	
<i>Impact AES-1 Potential for the Plan to have a substantial adverse effect on a scenic vista</i>	No mitigation applies. PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Consistent with SB 743, City of
PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity; h) Use see-through safety barrier designs (e.g. railings rather than walls) 	<p>Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within Transit Priority Areas (TPAs) pursuant to CEQA.</p> <p>The Project includes development of a mixed-use building with 290 dwelling units and 7,500 square feet of commercial restaurant use within multiple City-designated TPAs (including the D Line extension at Wilshire/La Cienega and the intersection of Pico Boulevard and La Cienega) and within a SCAG-designated High Quality Transit Area (HQTA). As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure into the Project is not required.</p>
<p><i>Impact AES-2 Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway</i></p> <p>See PMM AES-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM AES-1 above.</p>
<p><i>Impact AES-3 Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality</i></p>	<p>No mitigation applies. See discussion of the applicability of PMM AES-1 above.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: <ul style="list-style-type: none"> - use transparent panels to preserve views where sound walls would block views from residences; 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - construct sound walls of materials whose color and texture complements the surrounding landscape and development; <p>g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation</p>	
<p><i>Impact AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area</i></p> <p>PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. 	<p>No mitigation applies. See discussion of the applicability of PMM AES-1 above.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</p> <p>i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</p>	
AGRICULTURAL RESOURCES	
<p><i>Impact AG-1 Potential for the Plan to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use</i></p> <p>PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank¹ that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing 	<p>No mitigation applies. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.¹ Therefore, the Project would not 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. Thus, incorporation of this mitigation measure into the Project is not required.</p>

¹ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>underpasses and overpasses at reasonable intervals to provide property access.</p> <p>f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</p>	
<p>Impact AG-2 Potential for the Plan to conflict with existing zoning for agricultural use, or a Williamson Act contract</p> <p>PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</p> <p>b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.</p>	<p>No mitigation applies. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.² Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Thus, application of this mitigation measure to the Project is not required.</p>
<p>Impact AG-3 Potential for the Plan to 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))</p> <p>PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p>	<p>No mitigation applies. Neither the Project Site nor the surrounding area is zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of this mitigation measure is not required.</p>

² Ibid.

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.</p>	
<p><i>Impact AG-4 Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use</i></p> <p>See PMM AG-3 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM AG-3 above.</p>
<p><i>Impact AG-5 Potential for the Plan to 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</i></p> <p>PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ul style="list-style-type: none"> a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. 	<p>No mitigation applies. Because the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of this mitigation measure is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.</p>	
AIR QUALITY	
<p><i>Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact AQ-2 Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation</i></p> <p>PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Minimize land disturbance.</p>	<p>No mitigation applies. The analysis of the Project’s potential air quality impacts in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project would not generate pollutant emissions in excess of applicable significance thresholds and would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. No significant impacts related to this issue have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.</p> <p>p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</p> <p>q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors</p>	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>should also consider including ZE/ZNE technologies where appropriate and feasible.</p> <p>r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p> <p>s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. <p>w) As applicable for port projects, the following measures should be considered:</p>	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: <ul style="list-style-type: none"> a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. <p>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	
<p><i>Impact AQ-3 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</i></p> <p>See PMM AQ-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM AQ-1 above.</p>
<p><i>Impact AQ-4 Expose sensitive receptors to substantial pollutant concentrations</i></p>	<p>No mitigation applies. See discussion of the applicability of PMM AQ-1 above.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
See PMM AQ-1 above.	
<p><i>Impact AQ-5 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
BIOLOGICAL RESOURCES	
<p><i>Impact BIO-1 Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service</i></p> <p>PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: <ul style="list-style-type: none"> i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts 	<p>No mitigation applies. The Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. No trees are located on the Project Site. Four street trees (one Indian laurel fig and three fern pines) are located along La Cienega adjacent to the Project Site, some or all of which could be removed as part of the Project.</p> <p>None of these trees is considered a “protected tree,” as defined by the City.³ However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that no significant impacts to nesting birds would occur. Thus, application of this mitigation measure to the Project is not required.</p>

³ Protected trees as defined by the City include oak trees (*Quercus* spp.) and Southern California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), and California bay trees (*Umbellularia californica*).

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>practices appropriate for potential local sensitive wildlife.</p> <p>l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</p> <p>m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</p>	
<p><i>Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service</i></p> <p>PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.</p> <p>b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</p>	<p>No mitigation applies. The Project Site is located in an urban area of the City and has previously been developed. No riparian habitat or other sensitive natural communities are located on the Project Site. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <p>d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.</p> <p>e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.</p> <p>f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.</p> <p>g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</p> <p>h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.</p> <p>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</p> <p>j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.</p> <p>k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.</p> <p>l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles,</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.</p> <p>m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.</p> <p>n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.</p> <p>o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.</p> <p>p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.</p> <p>q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</p> <p>r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</p>	
<p><i>Impact BIO-3 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</i></p> <p>PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to</p>	<p>No mitigation applies. The Project Site is not located on protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <ul style="list-style-type: none"> a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for 	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> -- Permittee-responsible mitigation -- Contribution of in-kind in-lieu fees -- Use of in-kind mitigation bank credits -- Where avoidance is determined to be infeasible, and <p>d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> -- Avoidance -- Impact Minimization -- On-site alternatives -- Off-site alternatives <p>e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p>	
<p><i>Impact BIO-4 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</i></p> <p>PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No mitigation applies. The Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Therefore, the Project would not 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. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <p>b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.</p> <p>c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.</p> <p>d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.</p> <p>e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.</p> <p>f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.</p> <p>g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.</p> <p>h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.</p> <p>i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.</p> <p>j) Require review of construction drawings and habitat connectivity mapping by a qualified</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>biologist to determine the risk of habitat fragmentation.</p> <p>k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</p> <p>l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.</p> <p>m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.</p> <p>n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:</p> <ul style="list-style-type: none"> -- Wildlife movement buffer zones -- Corridor realignment -- Appropriately spaced breaks in center barriers -- Stream rerouting -- Culverts -- Creation of artificial movement corridors such as freeway under- or overpasses -- Other comparable measures <p>p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</p> <p>q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16- 059), as well as best management practices, to benefit pollinators with a focus on native plants.</p>	
<p><i>Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance</i></p> <p>PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</p> <p>b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.</p> <p>c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.</p> <p>d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site,</p>	<p>No mitigation applies. As stated previously, there are no protected tree species on the Project Site. Four street trees (one Indian laurel fig and three fern pines) are located along La Cienega adjacent to the Project Site, some or all of which could be removed as part of the Project.</p> <p>The Applicant would be required to plant replacement trees on or adjacent to the Project Sites in conformance with the City’s Urban Forestry Division requirements for Project landscaping and tree replacement and planting.</p> <p>Any on-site tree removal will comply with the City’s Tree Replacement Program, and any removal and replacement of street trees in the public right-of-way will be to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio. If all four street trees are removed, eight would be required to be planted. The landscape plans (Appendix A, Sheet L1.01) show eight street trees along La Cienega Boulevard.</p> <p>As such, the Project would not have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Thus, incorporation of the mitigation measure is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.</p> <p>e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p> <p>f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p> <p>g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.</p> <p>h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources</p> <p>i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> -- Avoidance strategies -- Contribution of in-lieu fees -- Planting of replacement trees -- Re-landscaping areas with native vegetation post-construction -- Other comparable measures developed in consultation with local agency and certified arborist. 	
<p><i>Impact BIO-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</i></p> <p>PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. 	<p>No mitigation applies. The Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, incorporation of the mitigation measure is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.</p>	
CULTURAL RESOURCES	
<p><i>Impact 3.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5</i></p> <p>PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.</p> <p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal</p>	<p>Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts.</p> <p>No historical resources are located on the project Site. However, the Project Site is located adjacent to the Carthay Neighborhoods Historic District, which is a historical resource under CEQA, and is located adjacent to the locally designated South Carthay Historic Preservation Overlay Zone (HPOZ), which is presumed to be a historical resource under CEQA. To address potential indirect Project impacts to historical resources, Mitigation Measures MM-NOI-8 through MM-NOI-10 have been identified for the Project to ensure that construction-related vibration would not cause structural damage to any historical resources. The project would not result in any direct impacts to any historical resources.</p> <p>Regarding archaeological resources, the City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures that are equal to or more effective than PMM CULT-1. The South Central Coast Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed in</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> -- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. -- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p>	<p>October 2020. The search did not identify any known prehistoric or historic resources on the Project Site. Three prehistoric resources, five historic resources, and one site containing prehistoric and historic resources were identified within a half-mile radius of the Project Site. Given that resources are known to existing in the Project Site area, the Project Applicant would be required to comply with the City's mitigation measure for Inadvertent Discovery of Archaeological Resources, listed below and as identified in Section 5 (Sustainable Communities Environmental Impact Analysis), that would ensure the Project would not cause an adverse change in the significance of a historical archaeological resource.</p> <p>MM-CUL-1: Inadvertent Discovery of Archaeological Resources</p> <ul style="list-style-type: none"> • If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and: <ul style="list-style-type: none"> ○ The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact; ○ The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and ○ The Project Applicant shall comply with the recommendations of the

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If</p>	<p>evaluating archaeologist, as contained in the survey, study, or report.</p> <ul style="list-style-type: none"> • Project development activities may resume once copies of the archaeological survey, study or report are submitted to: <p align="center"> SCCIC Department of Anthropology McCarthy Hall 477 CSU Fullerton 800 North State College Boulevard Fullerton, CA 92834 </p> • Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. • A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p> <p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful</p>	

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Impacts and Mitigation Measure	Applicability to the Project
<p>reinternment in an area designated by the tribe.</p> <p>j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS.</p> <p>k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.</p> <p>l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p>	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p><i>Impact 3.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5</i></p> <p>See PMM CULT-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM CULT-1 above.</p>
<p><i>Impact 3.5-3 Disturb human remains, including those interred outside of dedicated cemeteries</i></p> <p>PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: <ul style="list-style-type: none"> -- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach 	<p>No mitigation applies. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures that are equal to or more effective than PMM CULT-2.</p> <p>The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State’s Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.</p> <p>-- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.</p>	<p>shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Thus, application of this mitigation measure to the Project is not required.</p>
ENERGY	
<p><i>Impact ENR-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact ENR-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
GEOLOGY AND SOILS	
<p><i>Impact GEO-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>Impact GEO-2 Result in substantial soil erosion or the loss of topsoil</p> <p>PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of 	<p>No mitigation applies. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM-GEO-1. The Applicant would be required by the City to implement the provisions of the South Coast Air Quality Management District’s (SCAQMD) Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City’s Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City’s grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities. Additionally,</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</p> <p>d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.</p>	<p>during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact GEO-3 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</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property</i></p> <p>No mitigation measures required</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature</i></p> <p>PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and</p>	<p>Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts.</p> <p>As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project's construction activities could result in impacts to paleontological resources. Project- and impact-specific mitigation measure (Mitigation Measure MM-GEO-1) has been identified to ensure the Project's impact would be less than significant.</p> <p>MM-GEO-1 Inadvertent Discovery of Paleontological Resources</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.</p> <p>b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the 	<p>In the event that potential paleontological resources are encountered during the Project's ground-disturbing activities, all work within 50 feet of the potential discovery shall cease, and a qualified paleontologist (Project Paleontologist), who meets the Secretary of Vertebrate Paleontology (SVP) standards, has experience working with asphaltic fossil deposits, and is approved by the Natural History Museum of Los Angeles County (LACM), shall be retained. If deemed necessary by the Project Paleontologist, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) shall be prepared. This plan will address specifics of monitoring and mitigation and will comply with the recommendations of the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. This plan (if deemed necessary) will be subject to the approval of the LACM and submitted to them for review before ground disturbance begins.</p> <p>The Project Paleontologist shall develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources as well as procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground-disturbing work commences and will include handouts to be given to new workers as needed.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.</p> <p>3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.</p> <p>4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.</p> <p>e) Avoid routes and project designs that would permanently alter unique geological features.</p> <p>f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</p> <p>g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.</p> <p>h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of</p>	<p>All ground disturbances at the Project Site that occur in previously undisturbed older alluvial sediments that have high paleontological potential shall require monitoring. Monitoring shall be conducted by a Paleontological Monitor, who meets the standards defined in the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Should asphaltic sediments be encountered during excavations, the monitor must also have prior experience or training working in asphaltic sediments and meet the approval of the LACM. Monitoring shall be conducted in accordance with the PRMMP and under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Project Paleontologist and the LACM. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>specimen processing, analysis, and research, and final curation arrangements.</p>	<p>monitors shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. When monitoring work is completed, the Project Paleontologist shall prepare a report of the findings of the monitoring plan after construction is completed.</p> <p>In the event of a fossil discovery, whether by the paleontological monitor or a member of the construction crew, all work shall cease in a 50-foot radius of the find while the Project Paleontologist assesses the significance of the fossil and document its discovery. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and in consultation with the LACM. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. The most likely repository is the LACM, and a repository agreement shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.</p>
GREENHOUSE GAS EMISSIONS	
<p>Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment</p> <p>PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or</p>	<p>No mitigation applies. As discussed in detail in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. Thus, incorporation of this mitigation measure into the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>other comparable measures identified by the Lead Agency:</p> <p>a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:</p> <ul style="list-style-type: none"> i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. <p>b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</p> <p>c) Include off-site measures to mitigate a project's emissions.</p> <p>d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of</p>	<p>Moreover, pursuant to California Public Resources Code Section 21159.28(a), a Sustainable Communities Environmental Assessment prepared for a residential or mixed use development that is consistent with the RTP/SCS, such as the Project, need not analyze or discuss project specific or cumulative greenhouse gas emission impacts from mobile source emissions generated by cars and light duty trucks.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>projects to minimize GHG emissions, including but not limited to:</p> <ul style="list-style-type: none"> i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. <p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: <ul style="list-style-type: none"> i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>parking, and showers and locker rooms;</p> <ul style="list-style-type: none"> vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. <p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p> <p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. <p>k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.</p>	
<p><i>Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases</i></p> <p>See PMM GHG-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM GHG-1 above.</p>
<p>HAZARDS AND HAZARDOUS MATERIALS</p>	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>Impact HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials</p> <p>PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. <p>The Hazardous Materials</p>	<p>Compliance with SCAG mitigation applies.</p> <p>The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts.</p> <p>The City has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically to address Project-specific impacts due to contaminated soils. As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project’s construction activities could result in removal of contaminated soils. Project- and impact-specific mitigation measures (Mitigation Measure MM-HAZ-1 and MM-HAZ-2 (listed below) have been identified to ensure the Project’s soil removal would be less than significant.</p> <p>Mitigation Measures</p> <p>MM-HAZ-1 Soil Management Plan</p> <p>A Soil Management Plan (SMP) shall be prepared for the proposed construction activities. The SMP shall describe the management of impacted soils which may be encountered during Site development, and outline health and safety procedures to minimize risk to onsite workers and personnel. In addition, the SMP shall describe the procedures for export of inert soil for offsite reuse. It is anticipated that data collected during the Phase II investigation and additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>Business/Operations Plan should include the following:</p> <ul style="list-style-type: none"> -- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. -- The location of such hazardous materials. -- An emergency response plan including employee training information. -- A plan that describes the way these materials are handled, transported and disposed. <p>d) Follow manufacturer’s recommendations on use, storage, and disposal of chemical products used in construction.</p> <p>e) Avoid overtopping construction equipment fuel gas tanks.</p> <p>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</p> <p>g) Properly dispose of discarded containers of fuels and other chemicals.</p> <p>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</p> <p>i) Identify and implement more stringent tank car safety standards.</p> <p>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</p> <p>k) Use the best available inspection equipment and protocols and implement positive train control.</p> <p>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</p> <p>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</p> <p>n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.</p>	<p>The SMP will be developed by a qualified environmental consultant for the site and implemented during site grading and excavation. The SMP would be reviewed by appropriate oversight agencies as follows.</p> <p>First, a draft version of a complete SMP prepared by a qualified environmental consultant would be submitted to the LAFD for review and comment. At the discretion of the LAFD, the draft SMP may also be provided to other expert agencies, including the Los Angeles County Fire Department Site Mitigation Unit of the Health Hazardous Materials Division (LACFD SMU), the Los Angeles Regional Water Quality Control Board (Water Board), and/or the Department of Toxic Substances Control (DTSC), should the LAFD determine such review is appropriate.</p> <p>Should the LAFD determine it is necessary, it would provide comments on the draft SMP to the applicant. Additional comments may be provided by the LACFD SMU, the Water Board, or the DTSC, upon the request of the LAFD and the determination by any such agencies that comments are warranted. All such comments, to the extent the agencies determine comments are warranted, would be incorporated into the final draft SMP. The SMP would then be implemented during the soil disturbance and site grading phases of Project construction.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.</p> <p>p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.</p> <p>q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.</p>	<p>The objective of the SMP is to establish policy and requirements for the management and disposal of soils generated during excavation and redevelopment, and other activities that may disturb potentially contaminated soil. The SMP will address the following elements:</p> <ul style="list-style-type: none"> • Specify soil-handling controls required for complying with local, state and federal overseeing agencies. • Prevent unacceptable exposure to contaminated soil. • Prevent the improper disposal of contaminated soils. • Specify the process for identifying, segregating, profiling and disposing of any stained/strong odor soil. • Specify the soil monitoring requirements during removal of previously identified subsurface structures to visually observe the subsurface conditions following removal and to collect soil samples from the excavation depth and sidewalls as necessary to evaluate the soil for the presence of any contaminants of concern (COCs). • Specify soil monitoring requirements in the event that stained or odorous soils are encountered if any other areas during excavation activities. • Specify procedures if any unknown subsurface structures such as USTs,

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>clarifiers, vaults, conduits, or piping are encountered. This may include stopping work, notifying the Environmental Consultant, sampling and analyzing for potential hazardous chemicals, providing recommendations for proper disposal.</p> <ul style="list-style-type: none"> • In the event that odorous or discolored soils are identified in accordance with the standards set forth in Rule 1166, Rule 1166 may require the presence onsite during construction activities of a qualified soil monitor to continuously monitor air emissions and record measurements at 15-minute intervals using a direct reading organic vapor analyzer (OVA). • If it is determined that soil exceeding contamination levels for TPH is identified, in accordance with Rule 1166, the following steps will be taken per the SMP: <ul style="list-style-type: none"> ○ All monitoring would be conducted at a distance no more than 3 inches above the soil surface using an OVA. ○ Monitoring would be initially conducted at a minimum frequency of one reading every 15 minutes. ○ Upon detection of TPH exceeding contamination levels, monitoring would be conducted at a minimum rate of one

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>reading for every five cubic yards excavated.</p> <ul style="list-style-type: none"> ○ Upon detection of TPH exceeding contamination levels, or stained and odorous soils, excavation activities would stop in the vicinity. Representative soil sample(s) would be obtained for analysis. ○ The SCAQMD would be notified with 24 hours of the first detection of TPH exceeding contamination levels. ○ Soil samples would be collected for characterization and disposal determination. ○ All contaminated soil would be segregated and removed from the site to an approved treatment/disposal facility. <p>At the conclusion of the proposed excavation activities and upon reaching the proposed redevelopment excavation depth, final confirmation soil samples will be collected to confirm the field readings.</p> <ul style="list-style-type: none"> ● In the event that soil TPH exceeding contamination levels is still present at the proposed excavation depth, additional excavation activities would continue per the SMP (and in accordance with Rule 1166). The additional excavation activities would continue until TPH is below contamination levels. At that time, final confirmation soil

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>samples will again be collected to confirm the field readings.</p> <p>MM-HAZ-2 Dewatering Treatment System</p> <p>Since building construction at the Site requires dewatering, a dewatering contractor shall be retained to design a treatment system to discharge to groundwater during construction pursuant to applicable Los Angeles Regional Water Quality Control Board requirements.</p> <p>The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities.</p> <p>The Project includes development of the site with mixed-use building, including 290 dwelling units and an additional 7,500 square feet of commercial restaurant use, similar to other mixed-use development already found in the Project Site area and region. The Project would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment</i></p>	<p>No mitigation applies. The Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation. Thus, incorporation of this mitigation measure is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials. 	
<p><i>Impact HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school</i></p>	<p>No mitigation applies. The Pressman Education Center and Academy and the St. Mary Magdalen Catholic school are located within 0.25 miles of the Project Site. However, as discussed</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials. 	<p>previously, the Project is a typical mixed-use (residential and commercial) development that would not emit or handle hazardous materials. Thus, application of this mitigation measure is not required.</p>
<p><i>Impact HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment</i></p> <p>PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. 	<p>No mitigation applies. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.⁴ Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, application of this mitigation measure is not required.</p>

⁴ Department of Toxic Substance Control, <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress>, accessed June 2, 2022.

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</p> <p>c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.</p> <p>d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.</p> <p>e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.</p> <p>f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.</p> <p>g) Obtain and submit written evidence of approval for any remedial action if required</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>by a local, state, or federal environmental regulatory agency.</p> <p>h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p> <p>i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.</p> <p>j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</p> <p>k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>(RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.</p> <p>l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.</p> <p>m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <p>n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</p> <p>o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.</p>	
<p>Impact HAZ-5 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</p> <p>See PMM NOISE-1, below.</p>	<p>No mitigation applies. The Project Site is not located within an airport land use plan or within two miles of a public airport. The closest airports to the Project Site are the Santa Monica Airport, located 4.75 miles southwest of the Site and Los Angeles International Airport (LAX), located 7.5 miles southwest of the Project Site. As such, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Thus, incorporation of this mitigation measure is not required.</p>
<p>Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan</p> <p>PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation. 	<p>No mitigation applies. The City has determined that this mitigation measure does not apply to the Project, because the mitigation measure is directed toward municipalities with control over transportation/circulation, conveyance of emergency information, and evaluation of emergency routes. The mitigation measure is not applicable to the Project.</p>
<p>Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires</p> <p>See Impact WF-2, below.</p>	<p>No mitigation applies. See discussion of the applicability of PMM WF-1 below.</p>
<p>HYDROLOGY AND WATER QUALITY</p>	

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p><i>Impact HYD-1 Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality</i></p> <p>PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent 	<p>No mitigation applies. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HYD-1. The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would comply with Los Angeles Municipal Code (LAMC) Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to comply with the City's Low Impact Development (LID) Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City's Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.</p> <p>i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.</p> <p>j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.</p> <p>k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.</p> <p>l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.</p> <p>m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</p>	<p>would be required to capture and treat the runoff volume produced by the 85th percentile storm event in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact HYD-2 Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin</i></p>	<p>No mitigation applies. The Project Site is located in a highly urbanized area of the City that is largely and is not a significant area of groundwater recharge. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate. 	
<p><i>Impact HYD-3a Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on-or off-site</i></p> <p>See PMM HYD-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM HYD-1 above.</p>
<p><i>Impact HYD-3b Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious</i></p>	<p>No mitigation applies. See discussion of the applicability of PMM HYD-1 and PMM HYD-2 above.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site</p> <p>See PMM HYD-1 and PMM HYD-2 above.</p>	
<p>Impact HYD-3c Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would 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</p> <p>See PMM HYD-1 and PMM HYD-2 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM HYD-1 and PMM HYD-2 above.</p>
<p>Impact HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation</p> <p>PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p>	<p>No mitigation applies. The Project Site is not in an area susceptible to floods, tsunamis, or seiches. Therefore, the Project would not risk release of pollutants due to inundation by floods, tsunamis, or seiches. Thus, incorporation of this mitigation measure is not required.</p>
<p>Impact HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan</p> <p>See PMM HYD-2 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM HYD-2 above.</p>
LAND USE AND PLANNING	
<p>Impact LU-1 Potential for the Plan to physically divide an established community</p>	<p>No mitigation applies. The Project does not include the development of new roadway</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: <ul style="list-style-type: none"> -- Selecting alignments within or adjacent to existing public rights of way. -- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. -- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: <ul style="list-style-type: none"> -- Alignment shifts to minimize the area affected. -- Reduction of the proposed right-of-way take to minimize the overall area of impact. -- Provisions for bicycle, pedestrian, and vehicle access across improved roadways. 	<p>facilities and would not otherwise physically divide a community. Thus, incorporation of this mitigation measure is not required.</p>
<p><i>Impact LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect</i></p>	<p>No mitigation applies. As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project would not conflict with any applicable land use plan, policy, or</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.</p>	<p>regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation measures are required. The Project is consistent with the General Plan, C2-1 zoning in conjunction with the TOC Program and permitted Tier 3 development rights provided in exchange for the provision of 10% of the total units (29 units) for Extremely Low Income households. Thus, incorporation of this mitigation measure into the Project is not required.</p>
MINERAL RESOURCES	
<p><i>Impact MIN-1 Potential to 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</i></p> <p>PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.</p> <p>b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county</p>	<p>No mitigation applies. The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>and city general plans, or other comparable measures such as:</p> <ol style="list-style-type: none"> 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources. 	
<p><i>Impact MIN-2 Potential to 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</i></p> <p>See PMM MIN-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM MIN-1 above.</p>
NOISE	
<p><i>Impact NOISE-1 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</i></p> <p>PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project</p>	<p>Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts.</p> <p>As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project’s construction activities could result in noise levels in excess of the City’s significance</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically 	<p>thresholds. Project- and impact-specific mitigation measures (Mitigation Measures MM-NOI-1 through MM-NOI-7 (listed below) have been identified to ensure the Project's construction noise impact would be less than significant.</p> <p>Mitigation Measures</p> <p>MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's eastern boundary that is adjacent to residential uses along South Alfred Street (i.e., "South Alfred Street Residences"). These sound barriers shall be a minimum 15 feet in height. Sound barriers abutting the Project's boundary with the residence located at 1023 S. Alfred Street shall be a minimum 20 feet in height and shall also be rated to achieve a sound attenuation of at least 15 dBA.</p> <p>MM-NOI-2 When bulk excavation activities are taking place, only one excavator or other heavy earthmoving vehicle shall be permitted to operate at any given time within 50 feet of individual residential properties associated with the South Alfred Street Residences receptor.</p> <p>MM-NOI-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's western boundary that is adjacent to La Cienega Boulevard. These sound barriers shall be a minimum 7 feet in height.</p> <p>MM-NOI-4 When in use, Concrete mixing trucks and concrete pumps operating from the La Cienega Boulevard public right-of-way, outside the confines of the sound barriers required by Mitigation Measure MM-NOI-3, shall be shielded with sound barriers rated to achieve a sound attenuation of at least 10 dBA.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <p>i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.</p> <p>l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</p> <p>m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.</p> <p>n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p>	<p>MM-NOI-5 If auger-cast piles are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily pile installation along these rows shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.</p> <p>MM-NOI-6 If DSM columns are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily column installation shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.</p> <p>MM-NOI-7 The on-site location of any slurry batch plant utilized for the installation of DSM columns shall be either (1) centered within the Project Site, no less than 80 feet from the Project’s eastern or western boundaries or (2) the slurry batch plant shall be shielded by sound barriers rated to achieve a sound attenuation of at least 15 dBA.</p> <p>Additionally, the Project would not result in any significant operational noise impacts. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<ul style="list-style-type: none"> <li data-bbox="250 235 824 470">o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. <li data-bbox="250 478 824 781">p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. <li data-bbox="250 789 824 856">q) Use of portable barriers in the vicinity of sensitive receptors during construction. <li data-bbox="250 865 824 1066">r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. <li data-bbox="250 1075 824 1167">s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. <li data-bbox="250 1176 824 1344">t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. <li data-bbox="250 1352 824 1419">u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. <li data-bbox="250 1428 824 1730">v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. <li data-bbox="250 1738 824 1873">w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. <li data-bbox="250 1881 824 1932">x) Locate transit-related passenger stations, central maintenance facilities, decentralized 	

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p>	
<p>Impact NOISE-2 Generation of excessive groundborne vibration or groundborne noise levels</p> <p>PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the 	<p>Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts.</p> <p>As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project’s construction activities could result in groundborne vibration levels in excess of the applicable significance threshold. Project- and impact-specific mitigation measures (Mitigation Measures MM-NOI-8 through MM-NOI-10 (listed below) have been identified to ensure the Project’s construction groundborne vibration impact would be less than significant.</p> <p>Mitigation Measures</p> <p>MM-NOI-8 Large earthmoving vehicles that are the vibrational equivalent of the FTA’s “Large Bulldozer” vibration reference equipment shall maintain a setback of at least 20 feet from South Alfred Street Residences and 6 feet from the commercial building at 1080 La Cienega Boulevard.</p> <p>MM-NOI-9 Vibratory rollers shall maintain a setback of at least 45 feet from South Alfred Street Residences and 15 feet from the commercial building at 1080 La Cienega Boulevard.</p> <p>MM-NOI-10 Pre-construction surveys shall be performed to document the existing conditions of contributing structures that are a part of the South Carthay HPOZ (“Contributing Structures”) and immediately adjacent to the Project Site. A groundborne vibration and structural/architectural monitoring program shall be implemented and recorded during the Project’s excavation and any other phases that require the use of large</p>

best available noise suppression devices (e.g., mufflers, silences, wraps).

- f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

earthmoving vehicles and/or vibratory rollers to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to these Contributing Structures do not exceed 0.12 inches per second. The performance standards of the groundborne vibration and structural/architectural program shall include the following:

- Prior to the start of construction, a detailed photographic survey shall document existing visible exterior conditions of Contributing Structures that are immediately adjacent to the Project Site. Any existing exterior damage that is visible from the Project Site shall be noted.
- A vibration monitoring system shall be installed at a location that is immediately adjacent to the Project's boundary with Contributing Structures. This system shall continuously measure and store vibration velocities during periods of construction activity. The system shall provide real-time alerts to a construction supervisor or representative immediately if a vibration velocity of 0.12 inches per second is detected.
- In the event that a vibration velocity of 0.12 inches per second is detected, work shall stop immediately in the vicinity of the affected area and nearby Contributing Structures. Construction activities may not resume until the source of the vibration exceedance has been identified and measures have been taken to prevent vibration-related damage from occurring. If necessary, feasible steps to reduce groundborne vibration levels shall be taken, such as downsizing construction

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
	equipment, reducing equipment power levels, or using less impactful techniques.
<p><i>Impact NOISE-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels</i></p> <p>See PMM NOISE-1 above</p>	<p>No mitigation applies. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. No potential impacts would occur, and no mitigation is required.</p>
POPULATION AND HOUSING	
<p><i>Impact POP-1 Induce a substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure)</i></p> <p>No project-level mitigation measures were identified for this issue.</p>	<p>No mitigation applies. No project-level mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact POP-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.</i></p> <p>PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. 	<p>No mitigation applies. No housing is currently located on the Project Site, and no housing would be displaced as a result of the Project. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).</p> <p>e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.</p>	
PUBLIC SERVICES	
<p><i>Impact PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives</i></p> <p>See PMM PSP-1 below.</p>	<p>No mitigation applies. See discussion of the applicability of PMM PSP-1 below.</p> <p>The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. The Project would be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, LAMC, and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. In addition, the City requires that plans for building construction, fire flow requirements, fire protection devices (e.g. sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project would not result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD, such that it would require the construction of a new fire station. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact PSP-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, 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</i></p> <p>PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to</p>	<p>No mitigation applies. The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan. 	<p>designed to reduce opportunity crime and ensure safety and security. Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the Los Angeles Police Department's (LAPD) capability to serve the Project Site. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact PSS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered education facilities, need for new or physically altered education facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives</i></p> <p>PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing</p>	<p>No mitigation applies. The City has determined that this mitigation measure does not apply to the Project, because the Project would be required to comply with similar existing regulations that are equal to or more effective than PMM PSS-1. The Project Applicant would be required to pay developer fees to the local school district as required by law and which considered full and complete mitigation, pursuant to Senate Bill (SB) 50 and California Government Code Section 65995. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</p>	
<p><i>Impact PSL-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives</i></p> <p>PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.</p>	<p>No mitigation applies. The Project Site is located in an urbanized area of the City that is already served by several existing libraries, including: Robertson Branch Library, Margaret Herrick Library, Fairfax Branch Library, and Baldwin Hills Branch Library. While the Project's residential population could result in an increased demand for library services, the Project would not create the need for new or altered library facilities. Thus, incorporation of this mitigation measure is not required.</p>
RECREATION	
<p><i>Impact REC-1 Potential to 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</i></p> <p>PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No mitigation applies. Several existing parks are located in the Project Site area. Additionally, the Project includes open space and recreational facilities in accordance with the LAMC, including an approximately 4,500 square foot publicly accessible pocket park at the north portion of the Project Site. Further, in accordance with Ordinance 184,505, the Applicant shall be required to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for parks and recreational facilities.</p> <p>Through compliance with City requirements, the provision of Code required common open space</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.</p> <p>b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:</p> <ul style="list-style-type: none"> i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards. 	<p>and additional non required publicly accessible open space, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Thus, incorporation of this mitigation measure is not required.</p>
<p><i>Impact REC-2 Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives</i></p> <p><i>Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment</i></p> <p>See PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.</p>

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
TRANSPORTATION	
<p>Impact TRA-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities</p> <p>No mitigation measures required.</p>	<p>No mitigation applies. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p>Impact TRA-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b)</p> <p>PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways: <ul style="list-style-type: none"> -- include TDM mitigation requirements for new developments; -- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; -- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; -- implement parking management programs, such as parking cash-out, 	<p>No mitigation applies. A Vehicle Miles Traveled (VMT) analysis was conducted for the Project as part of the <i>Transportation Assessment</i>, prepared by Gibson Transportation Consulting, Inc., dated June 2022 (refer to Appendix I). The Project’s VMT impacts were assessed, based on the Los Angeles Department of Transportation’s (LADOT) VMT Calculator tool. The Project Site is located in the Central Area Planning Commission (APC) area, which has a daily household VMT of 6.0 per capita and a daily work VMT of 7.6 per employee.</p> <p>As discussed in the <i>Transportation Assessment</i>, the Project would have a daily household VMT of 4.7 per capita. Additionally, per the City’s TAG, the Project’s commercial restaurant component, which totals 7,500 square feet, is considered a local-serving commercial use. As the commercial component provides less than 50,000 square feet, the Project’s commercial component would result in a “less than significant” VMT impact. Thus, the Project’s VMT would fall below LADOT’s threshold for the Central APC. Furthermore, no potential significant impacts related to any other transportation-related issues have been identified, and no mitigation measures are required. Thus, application of this mitigation measure to the Project is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>priority parking for carpools and vanpools;</p> <ul style="list-style-type: none"> -- develop TDM-specific performance measures to evaluate project-specific and system-wide performance; -- incorporate TDM performance measures in the decision-making process for identifying transportation investments; -- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and -- set aside funding for TDM initiatives. -- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis. 	
<p><i>Impact TRA-3 Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)</i></p> <p>No mitigation measures required.</p>	<p>No mitigation applies. The Project would not increase the number of curb cuts along the Project's La Cienega Boulevard frontage. The vehicular driveways would provide adequate sight distance, as La Cienega Boulevard has no curvatures and is relatively level adjacent to the Project Site. The design does not locate impediments that would affect visibility of approaching vehicles, pedestrians, or bicycles. Additionally, the vehicular driveways would intersect La Cienega Boulevard at right angles, to the extent possible, to maximize sight distance. No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><i>Impact TRA-4 Result in inadequate emergency access</i></p> <p><i>Impact WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan</i></p>	<p>Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project through compliance with LADOT requirements and shall be tailored to specifically address Project-specific impacts.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:</p> <ul style="list-style-type: none"> -- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. -- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. -- Scheduling of truck trips outside of peak morning and evening commute hours. -- Limiting of lane closures during peak hours to the extent possible. -- Usage of haul routes minimizing truck traffic on local roadways to the extent possible. -- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. -- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic 	<p>The Project would be required to comply with similar regulations that are equal to or more effective than PMM TRA-2. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction.</p> <p>Also, prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. Thus, application of this mitigation measure to the Project is not required.</p> <p>Even though there is no significant construction traffic impact, the Project would include the following project design feature as part of LADOT’s typical construction compliance requirement.</p> <p>During construction, the Project would include a Construction Traffic Management Plan (provided below as PDF-TRANS-1), which would ensure that adequate emergency access exists during construction. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit.</p> <p>Project Design Feature</p> <p>PDF-TRANS-1 Construction Traffic Management Plan</p> <p>Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>Controls for Construction and Maintenance Work Zones.</p> <ul style="list-style-type: none"> -- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. -- Storage of construction materials only in designated areas. -- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. -- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. -- Enhance emergency preparedness awareness among public agencies and with the public at large. 	<p>Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • Maintain access for land uses in the vicinity of the Project Site during construction; • Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible; • Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways; • Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
	<p>if needed, utilize an organized off-site staging area;</p> <ul style="list-style-type: none"> • Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation; • Prohibit construction worker or equipment parking on adjacent streets; • Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways; • Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets; • Contain construction activity within the Project Site boundaries; • Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate; • Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;</p> <ul style="list-style-type: none"> • Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or • Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.
TRIBAL CULTURAL RESOURCES	
<p><i>Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is:</i></p> <p style="padding-left: 40px;"><i>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</i></p> <p style="padding-left: 40px;"><i>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1</i></p> <p>See PMM CULT-1 above.</p> <p>PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project</p>	<p>No mitigation applies. AB 52 tribal consultation is not required for a SCEA.</p> <p>The City has determined that this mitigation measure does not need to be incorporated into the Project, because the City developed a Condition of Approval, which is equal to or more effective than PMM TRC-1. Thus, application of this mitigation measure to the Project is not required.</p> <p>The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law so that any potential impacts would be less than significant.</p> <p>Condition of Approval</p> <p>Inadvertent discovery of tribal cultural resources: In the event that objects or artifacts that may be tribal</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource. 	<p>cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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:</p> <ul style="list-style-type: none"> • Upon a discovery of a potential tribal cultural resource, the Applicant 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) 978-1290. • If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>recommendations are reasonable and feasible.</p> <ul style="list-style-type: none"> • The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. • If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation. • The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate. • Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
	<p>to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.</p> <p>Inadvertent discovery of Human Remains: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:</p> <ul style="list-style-type: none"> • Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or (323) 343-0714 (after hours, Saturday, Sunday, and holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American. • The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
	<p>goods.</p> <ul style="list-style-type: none"> If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. <p>In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Based on these conditions, any potential impacts would be less than significant.</p>
UTILITIES AND SERVICE SYSTEMS	
<p><i>Impact USSW-1 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</i></p> <p><i>Impact USSW-2 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste</i></p> <p>PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p> <ol style="list-style-type: none"> Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. Inclusion of a waste management plan that promotes maximum C&D diversion. Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, 	<p>No mitigation applies. The City, as lead agency, has determined that the Project would be in compliance with this mitigation, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM USSW-2.</p> <p>Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the CoIWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent CoIWMP (the 2020 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.⁵</p> <p>The CiSWMPP is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or</p>

⁵ County of Los Angeles Department of Public Works, CoIWMP 2020 Annual Report, October 2021.

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>(3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</p> <p>d) Reuse of existing structure and shell in renovation projects.</p> <p>e) Development of indoor recycling program and space.</p> <p>f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</p> <p>g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.</p> <p>h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.</p> <p>i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.</p> <p>j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.</p>	<p>recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020.</p> <p>The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.⁶ The City also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) in 2006, which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through established City recycling programs, and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects.</p> <p>In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure.</p> <p>Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with existing regulations. Project-generated C&D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the</p>

⁶ LASAN, Recycling, 2022, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-r?_adf.ctrl-state=auguwwldg_5&_afLoop=10870014375826670#!, accessed June 2022.

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</p> <p>l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.</p> <p>m) Provide education and publicity about reducing waste and available recycling services.</p> <p>n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.</p>	<p>Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact USWW-1 Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects</i></p> <p>See PMM HYD-1 above.</p> <p>PMM USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be 	<p>No mitigation applies. The analysis of the Project's potential impacts related to wastewater treatment in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project's estimated wastewater generation of approximately 36,730 gallons per day could be accommodated by the existing remaining daily treatment capacity of the Hyperion Treatment Plant. Additionally, the Project would be required to comply with the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements.</p> <p>The Bureau of Sanitation estimated the wastewater discharge from the Project and analyzed the sewer availability around the Site. The sewer infrastructure in the vicinity of the Project includes an existing 42-inch line on La Cienega Boulevard. The sewage from the existing 42-inch line feeds into a 39-inch line on Crescent Heights Boulevard before discharging into a 48-inch sewer line on Crescent Heights Boulevard. Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for the Project. Further detailed</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.</p>	<p>gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will 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 the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Project.⁷</p> <p>The Project would not require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects. No significant impacts related to these issues have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.</p>
<p><i>Impact USWW-2 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</i></p> <p>See PMM USWW-1 above</p>	<p>No mitigation applies. See discussion of the applicability of PMM USWW-1 above.</p>
<p><i>Impact USWS-1 Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects</i></p> <p>PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native</p>	<p>No mitigation applies. The Project would connect to the existing water conveyance infrastructure near the Project Site. As discussed in Section 5 (Sustainable Communities Environmental Analysis), the Project would consume approximately 36,730 gallons of water per day.</p> <p>According to Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (2020 UWMP), the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Year, a Single Dry Year, and Multiple Dry Years. The 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the</p>

⁷ Wastewater Response, Bureau of Sanitation, April 21, 2022.

**Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
<p>landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives</p> <p>b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.</p> <p>c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</p> <p>d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.</p>	<p>five-year drought, which started in 2021 (2020 UWMP, page 11-13). As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP.</p> <p>Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in CalGreen, City Ordinance No. 180822⁸ and in the LAGBC⁹ to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project.</p> <p>Therefore, the City would not require new water infrastructure or supply to meet the demand from the Project. Thus, application of this mitigation measure to the Project is not required.</p>
<p><i>Impact USWS-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years</i></p> <p>See PMM USWS-1 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM USWS-1 above.</p>
WILDFIRE	
<p>Impact WF-2 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</p> <p>Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires</p> <p>PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to</p>	<p>No mitigation applies. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.</p>

⁸ <http://clkrep.lacity.org/online/docs/2009/09-0510ord180822.pdf>

⁹ <http://www.ladbs.org/forms-publications/forms/green-building>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. 	
<p><i>Impact WF-3 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 risks or that may result in temporary or ongoing impacts to the environment</i></p> <p>See PMM HAZ-4 above.</p> <p>PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA_Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No mitigation applies. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.</p>

**Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures**

Impacts and Mitigation Measure	Applicability to the Project
<p>a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:</p> <ul style="list-style-type: none"> -- Submit a fire protection plan including the designation of fire watch staff; -- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; -- Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and -- Designate trained fire watch staff during project construction to reduce risk of fire hazards. 	
<p><i>Impact WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes</i></p> <p>See PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4 above.</p>	<p>No mitigation applies. See discussion of the applicability of PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4 above.</p>
<p><i>Source: SCAG, 2020-2045 RTP/SCS Final EIR, Mitigation Monitoring and Reporting Program, adopted May 2020.</i></p>	

5 SUSTAINABLE COMMUNITIES ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 (Public Resources Code (PRC) §21099(d)) sets forth new guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 miles of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”

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

PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is located within a transit priority area.

PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

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

As identified in Section 3 (SCEA Findings and Consistency) of this SCEA, the Project qualifies as an infill transit-oriented project pursuant to PRC Section 21099. Therefore, the Project is exempt from further analysis of aesthetic impacts. The analysis in this SCEA is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this SCEA is included to discuss what aesthetic

¹ City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed April 11, 2022.

impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this SCEA shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099 would the project:

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

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

No Impact. A significant impact could occur if Project would introduce incompatible visual elements within a field of view containing a scenic vista or substantially block a scenic vista. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provides a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.

The Project Site is located in an urbanized portion of Los Angeles and is topographically relatively flat. The Project would construct a 28-story building with a maximum height of approximately 332

feet (to the top of the highest parapet but may not include roof appurtenances allowed by the LAMC). From the Project Site area, only intermittent views are available of the Hollywood Hills, located to the north of the Project Site, due to intervening development. No scenic vistas that also include views of the Project Site are available from view points in the Project Site vicinity. Thus, the Project would not have a substantial adverse effect on a scenic vista. Furthermore, Public Resource Code (PRC) Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Therefore, Project impacts related to scenic vistas would not be significant.

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

No Impact. A significant impact could occur where scenic resources within a state scenic highway would be damaged or removed by the Project. The Project Site visible is not located within a state-designated scenic highway.² Notwithstanding, the Project Site does not contain trees, rock outcroppings, or historic buildings. As discussed in response to Checklist Issue V(a) (Cultural Resources – Historical Resources), the Project would not result in a significant adverse change in the significance of a historic resource. Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Therefore, Project impacts related to scenic resources would not be significant.

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

Less than Significant Impact. A significant impact could occur if the Project would conflict with applicable zoning and other regulations governing scenic quality. The surrounding area is improved with a variety of office, retail, restaurant, residential, and institutional (school) uses, with varying heights from two stories to high-rise buildings.

The Project would develop the Project Site with a new, contemporary 28-story mixed-use building on parcels that are currently vacant. Although the proposed building is taller than the general heights of buildings found in the immediate neighborhood, the tower element, which starts at the fourth level, occupies a small footprint of the Site and is located near the La Cienega Boulevard frontage and predominantly away from residential uses to the east. The base of the building is three stories, and the podium deck atop the base includes open space programmed with abundant landscaping, trees and resident amenities. As a result, the building’s tower approach creates greater architectural interest and variety rather than employing a block style lower uniform

² California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed April 11, 2022.

height building across the entire footprint of the Site which would be more imposing and impactful to the residential uses immediately to the east of the Site.

In addition, the Project's design would actively engage La Cienega Boulevard and maintain a human scale by incorporating a two-story volume residential lobby and 7,500-square-foot commercial restaurant space, which would be accessed by pedestrians from the sidewalk. At the northern end of the Site, the Project includes an approximately 4,500 square-foot publicly accessible open space plaza with a pedestrian walkway and seating area, landscaping, and hardscape elements. The Project would include improvements on the ground level to enhance the pedestrian realm including new street trees, short-term bicycle racks, upgraded sidewalk, and landscaping. Further, pursuant to the Los Angeles Municipal Code (LAMC) Sections 16.05.C and 16.05.D, the Project would be subject to site plan review by the City to ensure orderly development. The Project would not conflict with applicable zoning and other regulations governing scenic quality.

Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Therefore, Project impacts related to scenic quality would not be significant.

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

Less than significant impact. A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Project Site or which pose a safety hazard, such as to motorists utilizing adjacent streets. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours.

The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, exterior signage, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas.

The Project would include low-level exterior lights and lighting along pathways for security and wayfinding purposes. In addition, low-level lighting to accent architectural features and landscaping elements would also be incorporated throughout the Project Site. Proposed lighting would be designed in conformance with LAMC light intensity requirements to minimize light trespass from the proposed building and overall Project Site, reduce sky-glow to increase night sky access, and improve nighttime visibility through glare reduction, and would be consistent with surrounding urban lighting conditions. Further, all exterior windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Therefore, Project impacts related to light and glare would not be significant.

Cumulative Impacts

There are 14 related projects within a 0.5-mile radius of the Project Site (refer to Table 2-8 in Section 2 [Project Description] of this SCEA). None of these related projects is in visual proximity to the Project Site. The two nearest related projects (Nos. 10 and 11) are within 750 feet west of the Site, but are not visible from the Project Site due to the distance and intervening 4-story buildings along the west side of La Cienega Boulevard.

Additionally, as with the Project, all of the sites of the related projects are located within the boundaries of ZI-2452 Transit Priority Area in the City of Los Angeles. As such, PRC Section 21099 is applicable to the related projects, and aesthetics impacts of the related projects would not be significant. Therefore, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Extent of Important Farmland Map Coverage maintained by the State's Division of Land Resource Protection indicates that the Project Site is not included in the Important

Farmland category.³ Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Thus, no impact would occur.

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

No Impact. The Project Site is zoned C2-1-O (General Commercial), with a General Plan land use designation of General Commercial. The Project Site is not zoned for agricultural use, nor is the Site under or eligible for enrollment under a Williamson Act Contract.⁴ There are no Williamson Act Contracts in the City of Los Angeles (City).⁵ Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract, and no impact would occur.

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

No Impact. The Project Site is located in an urbanized area of the City and has been developed in the recent past. The Project Site does not include any forest or timberland and is not zoned as forest land or timberland. Therefore, no impact related to this issue would occur.

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

No Impact. The Project Site is currently zoned for commercial uses and has been developed in the past. No forest land is located on or near the Project Site. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact related to this issue would occur.

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

No Impact. The Project Site is located in an urbanized area of the City and has been developed in the recent past. No Farmland or forest land is located on or near the Project Site. Thus, the Project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact related to this issue would occur.

Cumulative Impacts

³ State of California Department of Conservation, California Important Farmland Finder: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed April 11, 2022,

⁴ State of California Department of Conservation, California Important Farmland Finder: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed April 11, 2022,

⁵ State of California Department of Conservation, Division of Land Resource Protection, The Williamson Act Status Report 2020-21, available at https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx, accessed April 11, 2022

There are 14 related projects within a 0.5-mile radius of the Project Site (refer to Table 2-8 in Section 2 [Project Description] of this SCEA), all of which are located in an urbanized area of the City. Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

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

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

Introduction

The information and analysis provided below are primarily based on the following (refer to Appendix B):

B-1 Air Quality and Greenhouse Gas Emissions Technical Modeling, NTEC, May 2022.

B-2 Construction Health Risk Assessment, Air Quality Dynamics, August 8, 2022.

Environmental Setting

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and

local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), sulfur dioxide (SO₂), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and Pb.

State

California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, 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. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds 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. Under the CCAA, the non-desert Los Angeles County portion of the Basin is

designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The State standards and attainment/non-attainment are also shown in Table III-1.

**Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County**

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O ₃	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m ³)	Non-attainment	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter – PM ₁₀	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	-	-
Fine Particulate Matter – PM _{2.5}	24-hour	-	-	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Attainment
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Attainment
Nitrogen Dioxide – NO ₂	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Attainment
Sulfur Dioxide – SO ₂	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m ³	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m ³	Non-attainment
Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations . Accessed April 25, 2022.					

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.⁶ The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It 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 South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- **Rule 401 Visible Emissions:** This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- **Rule 402 Nuisance:** This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."
- **Rule 403 Fugitive Dust:** This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to

⁶ CARB, *Air Quality and Land Use Handbook, A Community Health Perspective*, April 2005.

prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2016 Air Quality Management Plan

The 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS (Connect SoCal), SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.⁷ HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the United States Environmental Protection Agency (USEPA), and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among

⁷ SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals.

- Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.
- Goal 4:** Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.^{8,9}

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness,

⁸ USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

⁹ SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O₃

O₃ is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_x emissions is automobile exhaust. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O₃ irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO₂

NO₂ is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO₂ may even contribute to the development of asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

Sulfur Dioxide – SO₂

Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO₂ may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO₂, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM₁₀ and PM_{2.5})

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM₁₀) or even less than 2.5 microns (PM_{2.5}) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM₁₀ and PM_{2.5} include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead

emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. A complete list of these substances is maintained on CARB’s website.¹⁰

One key TAC is diesel PM, which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from gas- and diesel-powered vehicle emissions – diesel PM primarily from trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.¹¹ Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.¹² In addition to its carcinogenic potential, diesel PM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.¹³

Volatile Organic Compounds

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_x, CO, SO₂, etc.) and contribute to the formation of photochemical smog.

Existing Conditions

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas (SRAs) throughout the Basin. The Project Site is located in SCAQMD’s SRA No. 2, “Northwest Coastal Los Angeles

¹⁰ CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

¹¹ CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

¹² SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.

¹³ CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

County.” Table III-2 shows pollutant levels, state and federal standards, and the number of exceedances recorded in SRA No. 2 from 2018 through 2020. As shown, the one-hour state standard for O₃ was exceeded 6 times during this three-year period, and the federal standard was exceeded 11 times. CO and NO₂ levels did not exceed their respective CAAQS or NAAQS during this period. Data for PM₁₀, PM_{2.5}, SO₂, and Pb is not available for this period.

**Table III-2
Ambient Air Quality Data – SRA No. 2 “Northwest Coastal Los Angeles County”**

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2018	2019	2020
Ozone – O₃			
Maximum 1-hour Concentration (ppm)	0.094	0.086	0.134
Days > 0.09 ppm (State 1-hour standard)	0	0	6
Days > 0.070 ppm (Federal 8-hour standard)	2	1	8
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	1.6	1.9	2.0
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.3	1.2	1.2
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO₂			
Maximum 1-hour Concentration (ppb)	0.0647	0.0488	0.0766
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µm/m ³)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	N/A	30.00	27.60
Days > 35 µg/m ³ (Federal 24-hour standard)	N/A	0	0
Sulfur Dioxide – SO₂			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Lead - Pb			
Maximum Monthly Average Concentration (µg/m ³)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m ³)	N/A	N/A	N/A
N/A = data not available ppm = parts per million of air, by volume µg/m ³ = micrograms per cubic meter Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year . Accessed April 25, 2022.			

Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize

risk from air toxics across the Air Basin. Based on the MATES V model, the calculated cancer risk from air toxics in the Project's zip code (90035) is approximately 472 in one million, which is slightly higher than the Basin's average risk of 454 per one million. The air toxics risk in the Project Site's zip code is higher than it is for 55 percent of the population with the air basin.¹⁴

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to the Draft CalEnviroScreen 4.0, the Project Site's census tract is ranked 51st percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 68th percentile, indicating that its pollution burden is above average for the state.¹⁵

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. In general, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools, childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours, but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that localized significance thresholds (LSTs) based on shorter averaging periods, such as the NO₂ and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.¹⁶ The Project Site is located in an urbanized neighborhood with a diverse variety of receptors. Sensitive receptors in the vicinity of the Project Site include, but are not limited to, the following:

- **South Alfred Street Residences:** This receptor consists of residential uses that are located directly east of the Project Site along South Alfred Street.

¹⁴ SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A207&views=view_1. Accessed April 25, 2022.

¹⁵ Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. <https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/Draft-CalEnviroScreen-4.0/>. Accessed April 24, 2022.

¹⁶ SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.

- Pressman Academy: This school is located at 1055 South La Cienega Boulevard, approximately 100 feet west of the Project across La Cienega Boulevard.
- Beverly Park Senior Apartments: This senior living community is located at 1071 La Cienega Boulevard, approximately 100 feet west of the Project across La Cienega Boulevard.

Other nearby receptors where workers or other users may be present for one to eight or more hours include a multitude of commercial and other land uses surrounding the Project Site. The closest such land uses to the Project include commercial uses located directly north and south of the Project Site.

Receptors that are further from the Project Site than the previously identified receptors would experience lesser impacts.

a. Would the Project conflict with or obstruct implementation of the applicable air quality plan?

No Impact. As discussed below, the Project would not conflict with or obstruct implementation of the 2016 AQMP. Therefore, no impacts related to this issue would occur as a result of the Project.

Consistency with the 2016 AQMP and 2016-2040 RTP/SCS

As discussed earlier, the 2016 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2016-2040 RTP/SCS that are themselves largely based on growth forecasts from local governments like the City. Thus, a project is consistent with the 2016 AQMP, in part, if the project is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2016-2040 RTP/SCS. The Project Site is designated "General Commercial" by the General Plan and zoned C2-1-O, which permits the site's proposed land use. As such, 2016-2040 RTP/SCS assumptions about population and employment growth in the City accommodate the Project's land use on this site. The 2016-2040 RTP/SCS presumes an increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure, in some cases even outpacing what is currently anticipated by local general plans. Development of the Project would be consistent with this land use pattern and smart growth policies to increase housing density within HQTAs given the site's proximity to the D Line (i.e., Purple Line) extension and multiple high-frequency bus routes/High Quality Transit Corridors.

Not only would the Project be located within an HQTA, but the Project would contribute to the 2016-2040 RTP/SCS's goal of encouraging growth of walkable and mixed-use communities with ready access to transit infrastructure. By developing dense residential housing and commercial uses in a low-intensity infill location (i.e., a currently vacant lot) that is within 0.25 miles of multiple high-quality bus stops and 0.50 miles of a future D Line Station, the Project would contribute directly to the goals of the 2016-2040 RTP/SCS. Additionally, the Project would be located in a "Pedestrian Enhanced District," as designated by the City's Mobility Plan 2035. Given these

considerations, the Project Site's location would provide abundant opportunities for residents, employees, and other users to reduce vehicle trips, VMT, and associated emissions. Therefore, the Project would be consistent with the 2016-2040 RTP/SCS and, by extension, the 2016 AQMP.

Consistency with the General Plan Air Quality Element

The Air Quality Element of the City's General Plan also identifies policies and strategies for advancing the City's clean air goals. As shown below in Table III-3, the Project would be consistent with the applicable policies of the Air Quality Element.

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

Policies	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	Consistent: The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent The Project would not include the development of any unpaved roads or parking lots. The Project would also develop an unpaved lot that has been previously utilized for parking. Thus, development of the Project would eliminate any particulate emissions associated with this existing use.
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 Future employers could implement these transportation demand management strategies that help reduce traffic congestion, VMT, and subsequently air pollution. The Project's proximity to high-quality transit options and its inclusion of 184 bicycle parking spaces would encourage the reduction of vehicle trips and VMT.
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 Future employers could implement these telecommunications strategies that help reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	Consistent: Future employers could implement these strategies that help reduce traffic congestion, VMT, and subsequently air pollution. The Project would incorporate VMT reducing TDM strategies which include reduced parking (below general LAMC requirements), unbundled parking and provision of 184 bicycle parking spaces.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent Future employers could implement parking management programs that reduce employee vehicle travel. Residential parking will be unbundled from the units to encourage tenants to use alternate forms of transportation.
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 would not include any facilities for the types of special events referenced by this policy.

Table III-3

Project Consistency with City of Los Angeles General Plan Air Quality Element

Policies	Project Consistency
Policy 3.2.1 – Manage traffic congestion during peak hours.	Consistent: As discussed under Checklist Topic XVII (Transportation), the Project would not cause or materially contribute to substantial traffic congestion during peak hours.
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 Lead Agency for the Project is the City, which coordinates with SCAG, Metro, and other regional agencies on the management 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 is under review by the City.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent: The Project is a mixed-use infill development that would include ground-floor commercial uses and a resident lobby, both of which would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. Additionally, the Project Site is located near several transit options. The Project would provide 184 bicycle parking spaces and 128 EV parking spaces, of which 43 spaces would be EVCS.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent: The Project’s air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent: The Project would construct housing and commercial uses near other commercial, office, and cultural uses, allowing Project residents and employees to able to walk and bike to work, shopping, and entertainment. In addition, the Project Site’s location near robust transit opportunities (bus and the future Metro D Line) would further reduce dependence on automobile travel, reducing VMT and traffic congestion. The Project is proposed on a RTP/SCS identified “Livable Corridor” and within proximity to multiple “Job Centers”. TDM strategies employed by the Project include reduced parking (below general LAMC requirements), unbundled parking and provision of 184 bicycle parking spaces.
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent: The Project would be designed and constructed to meet the applicable requirements of the State’s Green Building Standards Code and the City’s Green Building Code.
Source: NTEC, 2022.	

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

Less Than Significant Impact. During the Project's construction and operational phase, the Project would generate pollutant emissions. However, as detailed below, the Project would not generate regional and localized emissions in excess of applicable significance thresholds. Thus, the Project would not 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. Therefore, the Project's air quality impacts would be less than significant.

Construction

A cumulatively considerable net increase would occur if the Project's construction-related emissions would exceed SCAQMD's significance thresholds. Construction of the Project is anticipated to last approximately 32 months. During this time, a variety of diesel-powered vehicles and equipment would operate onsite. For example, grading would require earthmoving vehicles such as excavators. Installation of foundation piles would require a drill rig and earthmoving vehicles. The building construction phase would require a tower crane.

The Project's maximum daily localized and regional emissions from construction, as estimated using SCAQMD's CalEEMod 2020.4.0 model, are shown in Table III-4. Because the SCAQMD's regional and localized significance thresholds (LSTs) for construction emissions are representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the CalEEMod analysis is to determine whether the Project's maximum one-day construction emissions would have the potential to exceed these thresholds. As such, the Project's CalEEMod analysis relies on conservative construction assumptions and generalized equipment scenarios that likely overestimate maximum daily construction emissions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely – even within the same construction phase or sub-phase. This analytical approach therefore minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds. The likelihood that the maximum daily construction estimated by this analysis would occur on a given construction workday is low; the likelihood that they would occur every day for the duration of a construction phase is zero.

The modeling also accounts for SCAQMD Rule 403 for fugitive dust. SCAQMD Rule 403 contains general requirements applicable to all fugitive dust sources, including the Project's construction, that involve minimizing visible emissions and reducing trackout from site driveways. SCAQMD Rule 403(d)(2) requires all sources to implement "best available control measures" ("BACMs") for fugitive dust. The BACMs, which are included in Table 1 of the regulation, require sources to adopt measures such as pre-watering soils prior to cut and fill activities, stabilizing soils during and after cut and fill activities, and stabilizing disturbed soils with water or other stabilizing agents to prevent the generation of visible dust plumes. Thus, the Project's soil stabilization and trackout

reduction procedures would not be required, conducted, or enforced pursuant to any CEQA mitigation: these procedures would be mandatory as a matter of SCAQMD Rule 403 compliance.

Regional thresholds and LSTs for each air pollutant are also shown for comparison in Table III-4. As shown, the Project’s regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Local emissions also would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. As a result, the Project’s construction-related emissions impacts on regional and localized air quality would be less than significant.

**Table III-4
Maximum Regional and Localized Daily Construction Emissions**

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Regional Emissions						
Excavation	1.9	35.4	21.3	0.1	4.5	2.5
Excavation – Haul Day ^A	1.3	66.5	21.6	0.3	5.0	1.8
Pile Installation ^B	1.5	12.2	15.2	<0.1	0.7	0.6
Building Construction (2023)	2.8	17.2	26.8	0.1	1.8	1.0
Building Construction (2024)	2.6	16.4	25.9	0.1	1.8	0.9
Building Construction (2025)	2.5	15.5	25.1	0.1	1.7	0.8
Architectural Coatings and Building Construction Overlap (2025)	19.0	17.5	35.3	0.1	2.6	1.1
Architectural Coatings (2025)	16.5	2.0	10.2	<0.1	0.9	0.3
Maximum Regional Emissions	19.0	66.5	35.3	0.3	5.0	2.5
<i>Regional Daily Threshold</i>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
Excavation	1.5	14.5	15.4	<0.1	3.1	1.9
Excavation – Haul Day	0.4	3.1	6.5	<0.1	1.0	0.2
Pile Installation	1.3	12.1	13.4	<0.1	0.5	0.5
Building Construction (2023)	1.7	13.8	15.0	<0.1	0.6	0.6
Building Construction (2024)	1.6	13.0	14.9	<0.1	0.5	0.5
Building Construction (2025)	1.5	12.3	14.8	<0.1	0.5	0.4
Architectural Coatings and Building Construction Overlap (2025)	17.3	13.8	17.2	<0.1	0.6	0.5
Architectural Coatings (2025)	15.8	1.5	2.4	<0.1	0.1	0.1
Maximum Localized Emissions	17.3	14.5	17.2	<0.1	3.1	1.9
<i>Localized Significance Threshold^C</i>	-	103	562	-	4	3
Exceed Threshold?	-	No	No	-	No	No
^A This scenario estimates daily emissions that would be associated with haul days. On designated haul days, up to 250 haul truck trips (125 empty inbound trips and 125 loaded outbound trips) would export cut soils from the Project Site to a landfill. ^B The Project would utilize either auger cast piles or deep soil mixing columns. To be conservative, the vehicles and equipment associated with both methods have been accounted for by the analysis. ^C Localized significance thresholds (LSTs) assumes the following: <ul style="list-style-type: none"> • 1-acre maximum daily disturbed acreage. This is the smallest project size used for analysis in the LST guidance document and is consistent with the SCAQMD’s “Fact Sheet for Applying 						

CalEEMod to Localized Significance Thresholds” document. Utilizing a 1-acre project size for construction results in the most stringent emissions thresholds.

- 25-meter (82-foot) receptor distance, which corresponds with distances to the nearest sensitive receptors. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds.
- The Project is located in SRA No. 2, “Northwest Coastal Los Angeles County.”

Source: NTEC, 2022; SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

Operational Emissions

Emissions associated with the Project’s operational phase were also calculated using CalEEMod 2020.4.0. As shown in Table III-5, the Project’s maximum daily emissions would not exceed SCAQMD’s regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would the Project’s maximum emissions exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, the Project’s operational-related emissions impacts on regional and localized air quality would be less than significant.

**Table III-5
Maximum Regional and Localized Operational Emissions**

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	9.8	0.3	23.9	<0.1	0.1	0.1
Energy	0.1	1.1	0.7	<0.1	0.1	0.1
Mobile Sources	5.9	5.9	54.2	0.1	12.6	3.4
Project Regional Emissions^A	15.9	7.3	78.8	0.1	12.8	3.6
<i>Regional Daily Thresholds</i>	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions	9.8	0.3	23.9	<0.1	0.1	0.1
<i>Localized Significance Thresholds^B</i>	-	103	562	-	1	1
Exceed Threshold?	-	No	No	-	No	No

^A Some figures may not add up properly due to rounding.

^B LSTs assumed the following:

- 1-acre project size, which is the smallest project size used for analysis in the LST guidance document. Utilizing a 1-acre project size for operations results in the most stringent emissions thresholds. Given that the actual size of the Project Site is 1.83 acres, this is a conservative assumption.
- 25-meter (82-foot) receptor distance, which corresponds with distances to the nearest sensitive receptors. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds.
- The Project is located in SRA No. 2, “Northwest Coastal Los Angeles County.”

Source: NTEC, 2022.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Construction

As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located within 25 meters or farther from the Project would not be exposed to substantial pollutant concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day would contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 32 months, and daily diesel PM emissions would vary considerably day by day, and by phase. As shown earlier, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. And as explained earlier, the maximum daily construction emissions are conservative estimates that are not likely to occur on a given construction workday, let alone every day for the entire duration of construction. Given these considerations, TAC emissions from the Project's construction equipment would not result in significant health risks.

It is worth noting that the Office of Environmental Health Hazard Assessment (OEHHA) is the agency tasked with providing guidance related to the preparation of health risk assessments (HRAs) in the State. The OEHHA's latest guidance on this issue was released in February 2015, *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* ("2015 Guidance Manual"). The 2015 Guidance Manual was prepared to assist local air districts in the formulation of their own rules and guidelines surrounding the preparation of HRAs. As stated in the manual's introduction: "The intent in developing [the 2015 Guidance Manual] is to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources." It notes "The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare an HRA," and that "Districts are to determine which facilities will prepare an HRA based on a prioritization process outlined in the law." It acknowledges that "local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation." Moreover, the Project's construction would not be subject to SCAQMD permitting decisions. Therefore, the OEHHA and its guidance as contained in the 2015 Guidance Manual have no direct relevance concerning whether or not the Project is obligated to provide a HRA. It is at the discretion of the SCAQMD, and the SCAQMD has not published any requirements, recommendations, or guidance endorsing the 2015 Guidance Manual's use for CEQA analysis of potential construction impacts.

For informational purposes, a construction HRA was conducted to quantify the impact of diesel particulate matter (DPM), which is identified as a toxic air contaminant pursuant to CCR Section 93001, associated with the generation of off-road equipment emissions during construction of the Project. The HRA quantifies both carcinogenic risks and noncarcinogenic hazards for the maximum exposed sensitive receptors adjoining the Project Site. To ensure a viable quantification of exposure, the technical approach used in the preparation of the HRA was composed of all relevant and appropriate assessment and dispersion modeling methodologies presented by the U.S.EPA, California EPA, and SCAQMD. Results of the HRA showed carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors did not exceed identified significance thresholds.¹⁷

Operation

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs. The Project would not include typical sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As a result, the Project operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. As shown earlier in Table III-2, CO levels in the Project Site area are well-below federal and state standards, as are CO levels in the Basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Thus, the Project's would not expose sensitive receptors to substantial CO concentrations as a result of CO hotspots, and this impact would be less than significant.

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors. The Project is a mixed-use development with housing and commercial uses that would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses, such as restaurants and residences. As a result, any odor impacts from the Project would be considered less than significant.

¹⁷ Construction Health Risk Assessment, Air Quality Dynamics, August 8, 2022.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.¹⁸ Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As discussed above, the Project would not generate emissions in excess of the applicable significance thresholds. Therefore, the Project's air quality impacts would not be considerable.

¹⁸ White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

IV. BIOLOGICAL RESOURCES

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

Would the Project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The information and analysis presented below are primarily based on the following (refer to Appendix C):

- C** Tree Report, Carlberg Associates, May 10, 2022.

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

No Impact. The Project Site is located in an urbanized area of the City and is currently vacant but has been developed in the recent past. The Project Site has been subject to substantial disturbance associated with the original construction of buildings that used to be on the site and ongoing regular maintenance of the landscaping and nearby surrounding areas are entirely developed. As such, the Project Site does not have potential to support endangered, rare, or threatened plant species. Therefore, no impact related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized area of the City and is currently vacant but has been developed in the recent past. There are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City located on or adjacent to the Project Site.¹⁹ Therefore, no impact related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized area of the City and is currently vacant but has been developed in the recent past. The Site does not contain wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board. In addition, a review of the National Wetlands Inventory identified no wetlands or water features on the Project Site. Thus, the Project would not have a substantial adverse effect on state or federally protected wetlands. Therefore, no impact related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized area of the City and is currently vacant but has been developed in the recent past. The Project Site and surrounding area are not part of a migratory wildlife corridor. Also, no wildlife nursery sites are located in the Project Site area. During Project construction activities, the four trees in the public right-of-way could be removed. The removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that any potential impacts on migratory birds would not occur. Thus, the Project would not interfere substantially with the

¹⁹ NavigateLA, Water, Lakes, and Streams layer: <http://navigateLA.lacity.org/navigateLA/>, April 11, 2022.

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. Therefore, no impact related to this issue would occur as a result of the Project.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. The City's Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); California Bay (*Umbellularia californica*); Mexican Elderberry (*Sambucus nigra ssp. caerulea*); and Toyon (*Heteromeles arbutifolia*).

According to the tree report prepared for the Project Site (included in Appendix C to this SCEA), none of the trees located in the public right-of-way are protected trees or shrubs under the City's Protected Tree Ordinance.²⁰

The Project would require removal of some or all of the four street trees. The Applicant would be required to replace these trees in accordance with the City's tree replacement requirements.

Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, Planning has analyzed the worst-case potential for removal of all street trees. Note that street trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The Project proposes to remove zero (0) protected trees, zero (0) protected shrubs, and up to four (4) street trees.

Any on-site tree removal will comply with the City's Tree Replacement Program, and any removal and replacement of street trees in the public right-of-way will be to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio. If all four street trees are removed, eight would be required to be planted. The landscape plans (Appendix A, Sheet L1.01) show eight street trees along La Cienega Boulevard.

Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands). Therefore, no impacts relate to this issue would occur as result of the Project.

²⁰ [Tree Report](#), Carlberg Associates, May 10, 2022. Refer to Appendix C.

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

No Impact. The Project Site is not located within the boundaries of a habitat conservation plan, natural community conservation plan, or any other similar local plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are 14 related projects within a 0.5-mile radius of the Project Site (refer to Table 2-8 in Section 2 [Project Description] of this SCEA). All of the related projects are located in highly urban areas and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area (SEA) or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The information and analysis presented below are primarily based on the following (refer to Appendix D):

- D** Cultural Resources Technical Appendix, Jenna Snow Historic Preservation Consulting, April 2022.

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

Less Than Significant With Mitigation Incorporated. As discussed below, with mitigation, Project impacts related to historical resources would be less than significant.

Regulatory Setting

National Register of Historic Places

The National Register of Historic Plans (National Register) is the nation's master inventory of known historic resources. Established under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Eligibility for in the National Register is addressed in National Register Bulletin (NRB) 15: *How to Apply the National Register Criteria for Evaluation*. NRB 15 states that in order to be eligible for the National Register, a resource must both: (1) be historically significant, and (2) retain sufficient integrity to adequately convey its significance.

Significance is assessed by evaluating a resource against established eligibility criteria. A resource is considered significant if it satisfies any one of the following four National Register criteria:²¹

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B (persons): associated with the lives of significant persons in our past;
- Criterion C (architecture): embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;
- Criterion D (information potential): has yielded or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or *integrity* – to convey the reason(s) for its significance. Integrity is best described as a resource’s “authenticity” as expressed through its physical features and extant characteristics. Generally, if a resource is recognizable as such in its present state, it is said to retain integrity, but if it has been extensively altered then it does not. Whether a resource retains sufficient integrity for listing is determined by evaluating the seven aspects of integrity defined by NPS:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Setting (the physical environment of a historic property);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
- Feeling (a property’s expression of the aesthetic or historic sense of a particular period of time);
- Association (the direct link between an important historic event/person and a historic property).

²¹ Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a “yes or no” determination – that is, a resource either retains sufficient integrity, or it does not. Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for the resource’s significance. Since integrity depends on a resource’s placement within a historic context, integrity can be assessed only after it has been concluded that the resource is in fact significant.

California Register of Historical Resources

The California Register of Historic Places (California Register) is an authoritative guide used to identify, inventory, and protect historical resources in California. Established by an act of the State Legislature in 1998, the California Register program encourages public recognition and protection of significant architectural, historical, archeological, and cultural resources; identifies these resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

The structure of the California Register program is similar to that of the National Register, though the former more heavily emphasizes resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant under one of the following four criteria, which are modeled after the National Register criteria listed above:

- Criterion 1 (events): associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- Criterion 2 (persons): associated with the lives of persons important to local, California, or national history;
- Criterion 3 (architecture): embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
- Criterion 4 (information potential): has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

Mirroring the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource’s integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.

Certain properties are automatically listed in the California Register, as follows:

- All California properties that are listed in the National Register;

- All California properties that have formally been determined eligible for listing in the National Register (by the State Office of Historic Preservation);
- All California Historical Landmarks numbered 770 and above; and
- California Points of Historical Interest which have been reviewed by the State Office of Historic Preservation and recommended for listing by the State Historical Resources Commission.

Resources may be nominated directly to the California Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register. There is no prescribed age limit for listing in the California Register, although guidelines state that sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with a resource.

City of Los Angeles Cultural Heritage Ordinance

The local designation programs for the City of Los Angeles include Historic-Cultural Monument (HCM) designation for individual resources and the adoption of Historic Preservation Overlay Zones (HPOZs) for concentrations of buildings, commonly known as historic districts.

The City of Los Angeles Cultural Heritage Ordinance (Chapter 9, Section 22.171 *et seq.* of the Los Angeles Administrative Code) defines an HCM as any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City of Los Angeles, meaning that it meets one or more of the following criteria:

1. It is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city, or community; or
2. It is associated with the lives of historic personages important to national, state, city, or local history; or
3. It embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Local historic preservation ordinances often include standards for determining whether a resource retains sufficient integrity to merit local historic designation, and this language can vary widely from municipality to municipality. Some local ordinances do not mention integrity at all. The Los Angeles Cultural Heritage Ordinance does not include language about integrity. When evaluating historic resources in municipalities where the historic preservation ordinance does not provide guidance for assessing integrity, in accordance with best professional practices it is customary to use the National Register's seven aspects of integrity to assess whether or not a resource retains sufficient integrity to convey its significance at the local level.

As with the National and California Registers, in assessing integrity at the local level, some aspects may be weighed more heavily than others depending on the type of resource being

evaluated and the reason(s) for its significance. For example, if a property is significant as an excellent example of an architectural style, integrity of design, workmanship and materials may weigh more heavily than integrity of setting. In contrast, if a property is significant for its association with an important event or person, integrity of setting, feeling, and association may weigh more heavily than integrity of design.

City of Los Angeles Historic Preservation Overlay Zone Ordinance

Historic districts in Los Angeles are regulated by the HPOZ Ordinance. The City of Los Angeles established the HPOZ ordinance in 1979. The ordinance was revised in 1997, 2000, 2004, and 2017. According to §12.20.3.B.17 of the LAMC, an HPOZ is “any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural or aesthetic significance.” The ordinance describes the procedures for the creation of new HPOZs, the powers and duties of HPOZ boards, and the review process for development projects within HPOZs. New HPOZ designations are typically initiated by the City Council through a motion of the Councilmember of the district, though the Director of Planning, the Cultural Heritage Commission, the City Planning Commission, or the owners and renters of properties within the district may also initiate an HPOZ designation. Once the designation is initiated, a historic resource survey of the district is completed by a qualified professional and reviewed for completeness and accuracy by City staff; public workshops and hearings are conducted; the survey is certified by the Cultural Heritage Commission; and the zoning changes associated with the HPOZ are ultimately adopted by the City Planning Commission and City Council.

SurveyLA

The Project Site is located within the City of Los Angeles, which has been subject to a Citywide historic resources survey known as SurveyLA. SurveyLA, the Los Angeles Historic Resources Survey, is the City’s comprehensive program to identify and document potential historic resources throughout the City of Los Angeles. SurveyLA is intended to provide baseline information on historic resources to inform planning decisions and support City policy goals and processes.

CEQA Thresholds

Historical resources are considered to be a part of the environment and are thereby subject to review under CEQA. Section 21084.1 of the California Public Resources Code states that for purposes of CEQA, “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.” This involves a two-part inquiry. First, it must be determined whether the project involves a historical resource. If it does, then the second part involves determining whether the project may result in a “substantial adverse change in the significance” of the historical resource.

To address these issues, guidelines relating to historical resources were formally codified in October, 1998 as Section 15064.5 of the CEQA Guidelines. The guidelines state that for purposes of CEQA compliance, a “historical resource” shall be defined as any one of the following:

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 included in a local register of historical resources, or identified as significant in a qualified historical resource survey, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrate that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources.

Once it has been determined that a historical resource is present, it must then be determined whether the project may result in a "substantial adverse change" to that resource. Section 5020.1. of the PRC defines a substantial adverse change as the "demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired." Furthermore, according to Title 14 of the California Code of Regulations (CCR), the significance of a historical resource is materially impaired when a project:

- A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Generally, a project that follows the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

Secretary of the Interior's Standards

As stated above, projects that conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards) are generally treated as projects that will not result in a substantial adverse change to historical resources. The Standards are widely used to guide federal, state, and local agencies as they carry out their historic preservation programs and responsibilities. The Standards are as follows:

1. A property shall be used for its historic purpose or to be placed in a new use that requires minimal change to the defining characteristics of the buildings and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property will be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Environmental Setting

While there are no historical resources at the Project Site, the Site is located west of a locally designated historic district, South Carthay Historic Preservation Overlay Zone (HPOZ), which

itself is within the larger Carthay Neighborhoods Historic District²², which was listed in the California Register in January 2022 and in the National Register in March 2022.

Along the east property line of the Project Site are several one-story garages associated with the two-story residential buildings that face Alfred Street as part of the South Carthay HPOZ. The garages are generally sided in stucco with red clay tile coping along the roof line. Some of the garages appear to be in poor condition.

The Project Site is vacant and is not listed in the National Register. The Site is located in a dense urban environment, adjacent to the Carthay Neighborhoods Historic District, which was listed in the National Register on March 1, 2022.

Similar to the National Register, the Project Site is vacant and are not listed in the California Register. The Site is located in a dense urban environment, adjacent to the Carthay Neighborhoods Historic District, which was listed in the California Register in January 2022.

Although the Project Site is vacant and thus, does not contain any historical resources, the Site is located adjacent to the California Register-listed Carthay Neighborhoods Historic District, which is a historical resource under CEQA. The Site is also located adjacent to the locally designated South Carthay HPOZ, which is presumed to be a historical resource under CEQA.

Thresholds of Significance

According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a “substantial adverse change” in the resource’s significance. Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource will be materially impaired.”

The significance of a historical resource is materially impaired when a project does the following:

- a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, the California of Historical Resources; or
- b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC of its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project established by a preponderance of evidence that the resource is not historically or culturally significant; or
- c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for

²² As shown in Figure 3 of the Cultural Resources Technical Appendix, the Carthay Neighborhoods Historic District is a larger space that comprises three HPOZs: Carthay Circle, South Carthay, and Carthay Square.

inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA.

A project that has been determined to conform with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (the Standards) shall generally be considered to be a project that will not cause a significant impact on a historical resource (Title 14 CCR, Section 15064.5(b)(3)).

Project Impacts

Direct Impacts²³

Construction activities including excavation, impaction, pile driving, shoring, etc. do have the potential to directly affect historic materials of the adjacent garages that line the east property line. The garages are located within the boundaries of the Carthay Neighborhoods Historic District and South Carthay HPOZ and are part of the contributing resources to the historic districts. In addition to the potential for damage from vibration, excavation and new construction could result in settling or displacement of the foundations of the existing garages.

Mitigation Measures MM-NOI-8 through MM-NOI-10, as described in the noise and vibration technical report prepared by NTEC and under Checklist Topic XIII (Noise) of this SCEA, would ensure the Project's construction activities would not result in building vibration related damage to the contributing structures that abut the Project Site. These measures mandate setbacks from the property line for certain construction activities as well as equipment and require preconstruction surveys, a vibration monitoring program during the Project's excavation phase and adherence to specified structural performance standards. Therefore, potential direct impacts from construction and excavation would be less than significant.

Indirect Impacts²⁴

The Project will not alter the immediate surroundings such that the significance of either South Carthay HPOZ or the Carthay Neighborhoods Historic District would be materially impaired. The Project will not destroy the essential character-defining features of the historic districts and integrity of both South Carthay HPOZ and the Carthay Neighborhoods Historic District will remain intact. Specifically, as the proposed project is located outside the boundaries of the historic districts, integrity of location, design, materials, workmanship, and feeling would not be impacted. Only integrity of setting has the potential for indirect impacts.

The Project will not remove part or all of the associated setting of the historical resources. Commercial development on La Cienega Boulevard is not an associated setting of either South Carthay HPOZ or the Carthay Neighborhoods Historic District. As seen in historic aerial photos, South Carthay HPOZ, specifically, as well as the Carthay Neighborhoods Historic District, developed separately from the commercial corridor on La Cienega Boulevard. Historic aerial photos show the street grid of La Cienega and Pico Boulevards laid out prior to development of

²³ Page 22, [Cultural Resources Technical Appendix](#), Jenna Snow Historic Preservation Consulting, April 2022.

²⁴ Page 23, [Cultural Resources Technical Appendix](#), Jenna Snow Historic Preservation Consulting, April 2022.

the South Carthay neighborhood. While residential development occurred in South Carthay throughout the later part of the 1930s, commercial development on La Cienega Boulevard did not begin until a decade after in the late 1940s and continued into the 1950s. Adopted as an HPOZ in 1984, South Carthay HPOZ has continued to develop over the past nearly 40 years independently of commercial activity along La Cienega Boulevard.

The Project will not result in the loss of historic features or spaces surrounding the historical resources. South Carthay HPOZ has the feeling of an enclosed enclave. Within the serene street grid of the HPOZ, there is little immediate sense of the larger city surrounding it. However, the tranquility of the neighborhood abruptly shifts at the western and southern boundaries along La Cienega and Pico Boulevards which are high intensity commercial and mixed-use corridors. There is no buffer zone transitioning between the HPOZ and the larger community to the south and east. With its considerable height, the proposed project will certainly be visible within the South Carthay HPOZ and throughout the Carthay Neighborhoods Historic District, but, as demonstrated along a couple of streets in the Carthay Neighborhoods Historic District that are directly south of Wilshire Boulevard, visibility will not change the serenity or compromise the setting of the HPOZ.

As a comparison, seven tall towers (over 10-stories) were constructed on the south side of Wilshire Boulevard between San Vicente Boulevard and Fairfax Avenue in the 1960s through 1980s.

Visible throughout the Carthay Neighborhoods Historic District, these towers are most visible near the intersection of Schumacher Drive and along Warner Drive. Despite these seven tall towers, Carthay Circle was adopted as an HPOZ in 1998. While distinct in size, mass, scale and proportion, the towers do not detract from the setting of either the Carthay Circle HPOZ or the Carthay Neighborhoods Historic District such that they were not eligible for designation. Rather, Carthay Circle HPOZ and the Carthay Neighborhoods Historic District have such a distinct setting and feeling that the tall towers on Wilshire Boulevard, adjacent to the historic district and Carthay Circle HPOZ, add to the sense of the neighborhood as a cohesive enclave, distinct from its surroundings. In the same way, the proposed project may also add to the distinct and special feeling of South Carthay HPOZ.

Although the Project will introduce a new building visible throughout both South Carthay HPOZ and the Carthay Neighborhoods Historic District, the setting of the historic districts would be retained. None of the identified character-defining features of the setting, including the street pattern, setbacks, mature street trees, arrangement of single-family and multi-family residences, and period revival architectural styles would be materially impaired. Both South Carthay HPOZ and the Carthay Neighborhoods Historic District would remain eligible for designation. Therefore, the Project's indirect impacts on historical resources would be less than significant.

Mitigation Measures

See the Mitigation Measures MM-NOI-8 through MM-NOI-10 listed under Checklist Topic XIII (Noise) of this SCEA.

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

Less Than Significant with Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Given that resources are known to existing in the Project Site area, it is possible that unknown archaeological resources could exist at the Project Site, and the potential exists for the inadvertent discovery of archaeological materials during ground-disturbing activities associated with the construction phase. However, implementation of Mitigation Measure MM-CUL-1 (listed below) would ensure that potential impacts related to unknown archaeological resources would be less than significant.

Mitigation Measures

With implementation of the following mitigation measure, Project impacts on archaeological resources would be less than significant:

MM-CUL-1 Inadvertent Discovery of Archaeological Resources

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:
 - The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
 - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
 - The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton

800 North State College Boulevard
Fullerton, CA 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

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

Less Than Significant Impact. Although the Project Site has been subject to grading and development in the past, the Project would require excavations below ground surface. A significant adverse effect could occur if grading or excavation activities associated with a project could disturb human remains.

No human remains are known to exist at the Project Site. Although unlikely, there is a possibility that human remains could be encountered during excavation and grading activities, which is a potential significant impact. If human remains are encountered, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure (CEQA Guidelines, Section 15064.5) shall be observed:

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

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. The NAHC will 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 as provided in Public Resources Code Section 5097.98. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains discovered during construction grading and/or excavation activities. Therefore, the Project's impacts on human remains would be less than significant.

Cumulative Impacts

As discussed above, the Project would not result in impacts on any significant historical resource. Impacts related to archaeological resources and human remains are site-specific and are

assessed on a site-by-site basis. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historic resources.

None of the related projects are within the Carthay Neighborhoods Historic District, including the 3 HPOZs. Related projects Nos. 1, 3, 5, and 14 are directly adjacent but outside of the Historic District and thus also outside of the HPOZs. No. 1 is currently under construction and framing its building. No. 3 is grading. No. 5 has not yet started construction. No. 14 has completed its construction. Because the related projects are outside the Historic District, they would not remove any contributing resources or affect the integrity of the Historic District.

Moreover, all development in the City (including the Project and the related projects) that involves ground-disturbing activities is required to implement standard City conditions of approval and/or mitigation related to the discovery of archaeological resources, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to archaeological resources and human remains would not be cumulatively considerable and less than significant.

VI. ENERGY

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Regulatory Setting

Federal

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. EPA 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.²⁵

State

Building Energy Efficiency Standards

The Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Building Energy Efficiency 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 California Energy Commission (CEC) to establish performance standards, in the form of an “energy budget” in terms of energy consumption per square foot of floor space. For this reason, the Building Energy Efficiency Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance

²⁵ United States Department of Transportation, CAFE standards, <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>, accessed April 10, 2022.

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 Building Energy Efficiency Standards that contain data and other information that helps builders comply with the Building Energy Efficiency Standards.

The 2019 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 Building Energy Efficiency Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements for the non-residential standards include alignment with the ASHRAE 90.1 2017 national standards. The 2019 Building Energy Efficiency Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The Building Energy Efficiency Standards are enforced through the local building or individual agency permit and approval processes.²⁶

California Green Building Standards Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code (CALGreen). The purpose of CalGreen 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, compliance with CalGreen is mandatory for all new buildings constructed in the state. CalGreen establishes mandatory measures for new residential and non-residential buildings, including energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. CalGreen was most recently updated in 2019 (2019 CalGreen Code). The updated 2019 CalGreen Code took effect on January 1, 2020. The Project would be required to comply with the lighting power requirements in the California Energy Code, CCR, Title 24, Part 6.

California Renewable Portfolio Standard²⁷

First established in 2002 under Senate Bill (SB) 1078, California’s Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 44 percent of total retail sales by 2024.²⁸

²⁶ CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

²⁷ CPUC, California Renewables Portfolio Standard (RPS), [²⁸ CPUC, Modification of Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities Final Regulations Submitted to Secretary of State on July 12, 2021: \[1050 La Cienega Boulevard Project
Sustainable Communities Environmental Assessment\]\(https://www.energy.ca.gov/media/6111, accessed April 11, 2022.</p></div><div data-bbox=\)](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard#:~:text=The%20Renewables%20Portfolio%20Standard%20(RPS,procured%20from%20RPS%2Dcertified%20facilities, accessed April 11, 2022.</p></div><div data-bbox=)

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy. The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources and adopting regulations for the enforcement of RPS procurement requirements of public-owned utilities.

Senate Bill 350

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.²⁹

Assembly Bill 32 and Senate Bill 32

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), 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 CPUC and the CEC 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.³⁰

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Arnold Schwarzenegger and Executive Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Assembly Bill 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 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

²⁹ Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.

³⁰ Ibid.

California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.³¹

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.³²

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 GHG emissions with requirements for greater numbers of zero-emission vehicles for model years 2017-2025. The components of the ACC program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.³³

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

Senate Bill 375, 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 emissions reduction mandates established in AB 32. SB 375 specifically requires each MPO to prepare a "sustainable communities strategy" (SCS) as a part of its RTP that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by

³¹ Clean Car Standards - Pavley, Assembly Bill 1943, www.energy.ca.gov/low_carbon_fuel_standard/

³² Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/

³³ CARB, California's Advanced Clean Cars Program, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>, accessed April 11, 2022.

reducing VMT from light-duty vehicles through the development of more compact, complete, and efficient communities.³⁴

SCAG is the MPO for the area in which the Project Site is located. 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. In 2016, SCAG adopted the 2016–2040 2016-2040 RTP/SCS.³⁵ The goals and policies of the 2016-2040 RTP/SCS are the same as those in the 2012–2035 RTP/SCS. SCAG introduced its proposed 2020-2045 RTP/SCS, titled "Connect SoCal," in 2019, which included virtually the same goals and policies as the 2016-2040 RTP/SCS/, and which was formally adopted by SCAG's Regional Council on September 3, 2020.

Senate Bill 1389

SB 1389 (Public Resources Code Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2016 Integrated Energy Policy Report, addresses a variety of issues including the environmental performance of the electricity generation system, landscaped-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, update on the Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and includes the *California Energy Demand Forecast*.³⁶

Regional

SCAG's 2016-2040 RTP/SCS presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. On April 7, 2016, the SCAG Regional Council adopted the 2016-2040 RTP/SCS, the mission of which is "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."³⁷ The 2016-2040 RTP/SCS includes land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial building types. Furthermore, the 2016-2040 RTP/SCS includes transportation investments and land use strategies that encourage carpooling,

³⁴ CARB, Sustainable Communities: <https://ww2.arb.ca.gov/our-work/topics/sustainable-communities>, accessed April 11, 2022.

³⁵ SCAG, 2016 RTP/SCS, dated April 2016.

³⁶ CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017.

³⁷ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, dated April 2016.

increase transit use, active transportation opportunities, and promoting more walkable and mixed-use communities, which would potentially help to reduce VMT.

The 2016-2040 RTP/SCS also establishes HQTAs, which are described as generally walkable transit villages or corridors that are within 0.5 miles of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.³⁸ Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within an HQTA as designated by the 2016-2040 RTP/SCS.³⁹

SCAG's 2020-2045 RTP/SCS builds upon the 2016-2040 RTP/SCA and outlines more than \$638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Local

Green LA: An Action Plan to Lead the Nation in Fighting Global Warming and ClimateLA

Green LA is the City's climate action plan. The plan, released in May 2007, sets forth a goal of reducing the City's GHG emissions to 35 percent below 1990 levels by the year 2030.⁴⁰ ClimateLA is the implementation program that provides detailed information about each action item discussed in the Green LA framework. ClimateLA includes focus areas addressing environmental issues including but not limited to energy, water, transportation, and waste.⁴¹ The energy focus area includes action items with measures that aim to increase the use of renewable energy to 35 percent by 2020, reduce the use of coal-fired power plants, and present a comprehensive set of green building policies to guide and support private sector development.⁴²

City of Los Angeles Sustainable City pLAn and Green New Deal

On April 8, 2015, the City released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to greenhouse gas reduction either specifically or by association. Actionable goals include increasing the green building

³⁸ SCAG, 2016–2040 RTP/SCS, p. 8.

³⁹ SCAG, 2016–2040 RTP/SCS; Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.

⁴⁰ City of Los Angeles, Green LA: An Action Plan to Lead the Nation In Fighting Global Warming, May 2007.

⁴¹ City of Los Angeles, Climate LA: Municipal Program Implementing the GreenLA Climate Action Plan, 2008.

⁴² Ibid.

standard for new construction, creating a benchmarking policy for building energy use, developing “blue, green, and black” waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction.

In 2019, the City prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between 2020 and 2050.

City of Los Angeles Green Building Code

The City’s Green Building Code is based on CalGreen, which 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 City’s Green Building Code:

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

The 2020 City of Los Angeles Green Building Code became effective on January 1, 2020. Therefore, projects filed on or after January 1, 2020, must comply with the provisions of the 2020 City Green Building Code.

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced. For example, in 2015, 3.61 million tons of aluminum was produced by recycling in the United States, saving enough energy to provide electricity to 7.5 million homes.⁴³ In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.⁴⁴

The City includes programs and ordinances related to solid waste. They include: (1) the City of Los Angeles Solid Waste Management Policy Plan, which was adopted in 1993 and is a long-

⁴³ American Geosciences Institute, How Does Recycling Save Energy?, <https://www.americangeosciences.org/critical-issues/faq/how-does-recycling-save-energy#:~:text=Extracting%20and%20processing%20raw%20resources,turn%20them%20into%20usable%20materials>, accessed April 11, 2022.

⁴⁴ CalRecycle, History of California Solid Waste Law, 1985–1989: [https://calrecycle.ca.gov/laws/legislation/calhist/1985to1989/accessed April 11, 2022.](https://calrecycle.ca.gov/laws/legislation/calhist/1985to1989/accessed%20April%2011,%202022)

range policy plan promoting source reduction for recycling for a minimum of 50 percent of the City's waste by 2000 and 70 percent of the waste by 2020; (2) the RENEW LA Plan, which is a Resource Management Blueprint with the aim to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources now going to disposal so as to achieve an overall diversion level of 90 percent or more by 2025; (3) the Waste Hauler Permit Program (Ordinance 181,519), which requires all private waste haulers collecting solid waste, including construction and demolition waste, to obtain AB 939 Compliance Permits and to transport construction and demolition waste to City certified construction and demolition processing facilities; and (4) the Exclusive Franchise System Ordinance (Ordinance No. 182,986), which, among other requirements, sets maximum annual disposal levels and specific diversion requirements for franchised waste haulers in the City to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. These solid waste reduction programs and ordinances help to reduce the number of trips to haul solid waste, therefore reducing the amount of petroleum-based fuel, and also help to reduce the energy used to process solid waste.

2017 Power Strategic Long-Term Resource Plan

The Los Angeles Department of Water and Power (LADWP) 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost effective manner. LADWP has postponed their 2018 SLTRP, and instead, the next SLTRP will be developed in 2020. As of December 2020, the 2017 SLTRP is still the applicable plan and the update has not yet been prepared. The 2017 SLTRP re-examines and expands its analysis on the 2016 Final Power Integrated Resource Plan resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent RPS, advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification.

Recent updates include an updated 2016-17 Energy Efficiency Potential Study results with a target of 15 percent energy efficiency from 2017 through 2027, revised energy storage procurement targets, and completion of a distributed energy resources study titled, "Distributed Energy Resources Implementation Study (DERIS)." The 2017 SLTRP also includes numerous updates including new renewable projects, associated transmission upgrade cost and fuel cost assumptions, along with a host of other updates. The 2017 SLTRP uses system modeling tools to analyze and determine the long-term economic, environmental, and operational impact of alternative resource portfolios by simulating the integration of new resource alternatives within the existing mix of assets and providing the analytic results to inform the selection of a recommended case that is cost effective in reducing greenhouse gas emissions and maintains superior system reliability.

Early coal replacement and energy efficiency continue to be key strategies to reduce greenhouse gas emissions. Increasing the RPS to 55 percent by 2030 and 65 percent by 2036, including increased amounts of energy efficiency, local solar and energy storage, are other key initiatives to reduce greenhouse gas emissions. The 2017 SLTRP analyzed electrification of the transportation sector as a strategy to further reduce overall GHG emissions and to significantly reduce local emissions such as VOC, NO_x, CO, and PM_{2.5} that would result from electrifying local

transportation and therefore recommends expanding existing programs to promote increased workplace and residential electric vehicle charging stations to support greater electric vehicle adoption while collaborating with regulatory agencies to develop mutually beneficial policies.

The 2017 SLTRP also includes a general assessment of the revenue requirements and rate impacts that support the recommended resource plan through 2037. While this assessment will not be as detailed and extensive as the financial analysis that was completed for 2015-16 fiscal year rate action, it clearly outlines the general requirements. As a long-term planning process, the 2017 SLTRP examines a 20-year horizon in order to secure adequate supplies of electricity.

Existing Conditions

Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100-W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion Wh.

LADWP provides electrical service throughout the City and many areas of the Owens Valley, serving approximately 4.0 million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes LADWP's service area north of Mulholland Drive, and the Metropolitan Planning District includes LADWP's service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Existing Electricity Consumption at the Project Site

Electricity is provided to the Project Site through a network of utility poles that are operated and maintained by the LADWP. LADWP is currently upgrading power lines along La Cienega Boulevard which is needed to provide sufficient electricity to the Project Site. The Project Site is vacant and does not consume any electricity.

There is one overhead 4.8kV circuit adjacent to the project site which runs along Whitworth Drive. There are two underground 4.8kV circuits adjacent to the project site which run along La Cienega

Boulevard and Schumacher Drive. Electric Service is available, and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service.⁴⁵

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the state, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and thus, resource availability is typically not an issue. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel.

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies. The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provides only a small share of SoCalGas supplies due to the high cost of transport.

SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project Site vicinity.

Existing Natural Gas Consumption at the Project Site

Natural gas is provided to the Project Site through a network of underground pipelines that are operated and maintained by SoCalGas. The Project Site is vacant and does not consume any natural gas.

Transportation Energy

According to the CEC, transportation accounts for nearly 40 percent of California's total energy consumption in 2018.⁴⁶ In 2021, California consumed 13 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.⁴⁷ Petroleum-based fuels currently account for 90 percent of California's

⁴⁵ [Water and Power Response](#), Los Angeles Department of Water and Power, April 26, 2022.

⁴⁶ CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017, p. 4.

⁴⁷ California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report: <https://www.cdtfa.ca.gov/taxes-and-fees/spfrpts.htm>, accessed April 11, 2022.

transportation energy sources.⁴⁸ However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.⁴⁹ According to CARB's EMFAC Web Database, Los Angeles County's on-road transportation sources consumed 3.76 billion gallons of gasoline and 1.18 billion gallons of diesel fuel in 2019.⁵⁰

Existing Transportation Energy Consumption at the Project Site

The Project Site is vacant and does not consume any gasoline or diesel fuel.

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

Less Than Significant Impact. Below is a discussion of eight criteria contained in the *CEQA Guidelines* to help determine whether the Project would result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

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

Construction

Project construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). 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 based on existing upgrades which are currently underway and would be obtained from electrical lines to be connected 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.

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

⁴⁸ CEC, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.

⁴⁹ CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.

⁵⁰ CARB, Emfac2021 Web Database: <https://arb.ca.gov/emfac/emissions-inventory>, accessed April 11, 2022.

state's transportation fuel consumption. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 36.1 miles per gallon (mpg) in 2020.⁵¹ In 2020, California consumed a total of 273,289 barrels of gasoline for transportation, which is equivalent to a total annual consumption of 11.4 billion gallons by the transportation sector.⁵²

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.⁵³

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or 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.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, refrigeration, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips.

⁵¹ Caltrans, California Transportation Plan 2040: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/f0004899_ctp2040_a11y.pdf, accessed April 11, 2022.

⁵² US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, accessed April 11, 2022.

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

As shown in Table VI-1, the Project’s demand for electricity would be approximately 1,834,766 kWh per year. As shown in Table VI-2, the Project’s demand for natural gas would be approximately 11,891 kBTU per year.

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

Land Use	Total (kw-h/yr)¹
Residential	1,108,700
Commercial	324,525
Enclosed Parking	<u>401,541</u>
Total	1,834,766
<i>du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year</i>	
¹ <i>Calculated via CalEEMod. Refer to Appendix B.</i>	

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

Land Use	Total (kBTU/yr)¹
Residential	7,159
Commercial	4,732
Enclosed Parking	<u>0</u>
Total	11,891
<i>du = dwelling unit, sf =square feet, kBTU = 1,000 British Thermal Units, yr = year</i>	
¹ <i>Calculated via CalEEMod. Refer to Appendix B.</i>	

Electricity

With compliance with Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 1,834,766 per year (refer to Table VI-1).

LADWP is required to procure at least 44 percent of their energy portfolio from renewable sources by 2024. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 36.7 percent of LADWP’s overall energy mix in 2020, the most recent year for which data are available.⁵⁴ This represents the available off-site renewable sources of energy that would meet the Project’s energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs.

⁵⁴ CEC, Utility Annual Power Content Labels for 2016, <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label>, accessed April 11, 2022.

Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2026-27 fiscal year (encompassing the Project's 2026 buildout year) is estimated to be approximately 23,807 GWh of electricity.⁵⁵ As such, the Project-related increase in annual electricity consumption of 1,834,766 kWh per year would represent approximately 0.007 percent of LADWP's projected sales in 2026.

Moreover, power upgrades are underway to service La Cienega Boulevard largely because previously approved developments at this Site could not move forward due to the lack of available electricity.

Natural Gas

With compliance with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is projected to generate an increase in the on-site demand for natural gas totaling approximately 11,891 kBtu per year, or approximately 32.5 cf per day.⁵⁶

Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2,782 million cf per day in 2026 (the Project's buildout year). The Project would account for a fraction of a percent of the forecasted 2026 consumption in SoCalGas's planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City's Green Building Code to reduce energy usage.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted above, the Project Site is located in an HQTa and along a "Livable Corridor" designated by SCAG as well as a TPA which all indicate that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Extensive public bus and rail transit service is provided within the Project study area. The Project Site would be served by the new Metro D Line Wilshire/La Cienega Station that is under construction and Metro bus lines 28 and 105. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving.

Additionally, the Project would provide bicycle storage areas for Project residents and guests in accordance with LAMC requirements. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended mitigation measures, and would reduce vehicle trips to the Project Site and VMT to the Project Site. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy

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

⁵⁶ Assuming 1 kBtu = 1 cf.

consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. Qualifying measures applicable to the Project include the following:

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the Project Site’s residential density and commercial use as compared to the vacant site.
- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The Project would introduce new uses on the Project Site, including new residential (market rate and affordable housing) and restaurant commercial uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.
- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is located in a dense area, easily accessible by public transportation close to multiple SCAG identified Job Centers. Access to multiple destinations, and other commercial and retail uses in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions as a result of the Project.
- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The Project would be located near several high frequency Metro bus routes and future Metro Rail service. The Project would also provide bicycle parking spaces for resident and commercial uses to encourage utilization of alternative modes of transportation. Residential parking will be unbundled from the units as an incentive for tenants to utilize alternate means of transportation.
- **CAPCOA Measure LUT-9 – Improve Design of Development:** The Project would enhance the pedestrian environment by developing ground floor commercial uses, as well as an improved streetscape, which would enhance walkability in the Project vicinity.
- **CAPCOA Measure SDT-2 – Traffic Calming Measures:** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. Streets within a half mile of the Project Site are equipped with sidewalks, and several of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

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

Construction

During construction, electricity would be used to provide temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the

construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction capabilities.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.007 percent of LADWP's projected sales in 2026-27, and new infrastructure is currently being installed to service the area that includes the Project Site. Also, the Project's estimated increase in demand for natural gas would account for a fraction of a percent of the forecasted 2026 consumption in SoCalGas's planning area. In summary, energy consumption during Project operations would be relatively negligible, and energy requirements would be within LADWP's and SoCalGas's service provision.

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

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions, especially in light of the new upgrades currently underway. With regard to peak load conditions, LADWP's power system forecasts a peak of 6,640 MW in 2026-27.⁵⁷ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.⁵⁸ In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.003 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.⁵⁹ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid, and power would be provided to the Project based on newly installed electrical infrastructure that will service La Cienega Boulevard.

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

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

⁵⁷ 2017 Power Strategic Long-Term Resource Plan, December 2017, page 6.

⁵⁸ 2017 Power Strategic Long-Term Resource Plan, December 2017, page 74.

⁵⁹ 2017 Power Strategic Long-Term Resource Plan, December 2017, page 17.

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

5) *Effects of the Project on Energy Resources*

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

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.⁶⁰ According to the U.S. Energy Information Administration (EIA), the United States currently has over 98 years of natural gas reserves based on 2020 consumption.⁶¹ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.⁶² The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. LAMC Section 99.05.211.1 (Solar Ready Buildings) states that Projects must comply with California Energy Code Section 110.10. The 2019 Building Energy Efficiency Standards took effect on January 1, 2020. Per CCR Title 24, Part 6, Section 110.10(b) through 110.10(d), a solar zone applies to single family subdivisions of 10 or more, low-rise multi-

⁶⁰ California Gas and Electric Utilities, 2020 California Gas Report.

⁶¹ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed April 12, 2022.

⁶² BP, Statistical Review of World Energy, 2021, 70th Edition, page 17, <https://www.bp.com/content/dam/bp/business-sites/en/global/corporate/pdfs/energy-economics/statistical-review/bp-stats-review-2021-oil.pdf>, accessed April 12, 2022.

family, and high rise buildings of 10 or fewer stories, and non-residential buildings of 3 or fewer stories.

However, due to the Project Site location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels.

Furthermore, while the Project Site is located in a Methane Zone, and while methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁶³

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

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

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

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

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

⁶³ CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, <https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3D%26qCw3hR%255Bv%255D%3D%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&IR=0&mC=36.416862115300304%2C-120.421142578125&zL=8>, accessed April 12, 2022.

energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

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

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

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), SCAG's RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region.

As part of the approach, the RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the RTP/SCS. The Project would place a mixed-use development with a high degree of pedestrian engagement in an area with neighborhood services, jobs, other residential uses, that is well served by existing public transportation, including Metro bus lines and the future rail line. This is evidenced by the Project Site's location within a designated HQTAs and along a "Livable Corridor" near multiple SCAG identified "Job Centers". The introduction of new housing and job opportunities within an HQTAs and along a Livable Corridor, as proposed by the Project, is consistent with numerous policies in the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS related to locating new housing and jobs near transit.

The 2016-2040 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and an 18 percent decrease in VMT by 2035, while the 2020-2045 RTP/SCS would result in an estimated 8 percent decrease by 2020 and a 19 percent decrease by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS are expected to fulfill and exceed their portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel use. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation

capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

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

Less Than Significant Impact. Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen building code, and the City's Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As discussed in more detail in Section 3 (SCEA Findings and Consistency) and in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency), the Project would also be consistent with and SCAG's 2020-2045 RTP/SCS and the LA Green Plan/Climate LA. The vertical expansion on the Project Site would serve to reduce VMT and associated transportation fuel usage within the region.

In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and stormwater capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation, thereby meeting the goals of the LA Green Plan/ClimateLA. With respect to the Sustainable City pLAn, as described in more detail in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency), although the pLAn is not directly applicable to private development projects, the Project would generally be consistent with the City's targets related to decrease of VMT per capita by 5 percent by 2025 and to increase trips made by walking, biking, or transit by at least 35 percent by 2025. The Project would generally comply with these targets as the Project is an infill development consisting of residential and commercial uses on the Project Site, which is located near regional and local transit services. The Project would be well-served by transit and would implement TDM measures that would encourage transit use. Furthermore, the Project would comply with the LA Green Building Code, which requires a 20 percent reduction in water use and a requirement to exceed Title 24 energy efficiency standards.

For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Electricity

The Project, in conjunction with the related projects, could result in a net increased demand for electricity supplies. LADWP's 2017 SLTRP serves as a comprehensive 20-year plan to supply

reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030.

Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Additionally, as discussed above, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

The Project, in conjunction with the related projects, could result in a net increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, all of the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not

result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The information and analyses presented below are primarily based on the following (refer to Appendix E):

E-1 Geotechnical Investigation, GeoPentech, March 30, 2022.

E-2 Paleontological Response, Natural History Museum, Los Angeles County, April 16, 2022.

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

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

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.⁶⁴ The closest known fault to the Project Site is the Newport-Inglewood fault, which is approximately 1.5 kilometers from the Project Site. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Site. Therefore, no impacts related fault rupture would occur as a result of the Project.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in a seismically active Southern California region. Known regional active faults that could produce significant ground shaking at the Project Site include the Hollywood and Santa Monica faults, respectively. Other faults located near the Project Site are the Puente Hills and the Upper Elysian Park blind thrusts. However, these faults are considered inactive. Given the Project Site location in a seismically active region, the Site could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project

⁶⁴ City of Los Angeles ZIMAS Parcel Profile Report, website: zimas.lacity.org, accessed April 12, 2022; and Geotechnical Investigation Report, Geopentech, March 30, 2022.

would be required to conform to the current seismic design provisions of the CBC. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials. The Project Site is located in an area that has the potential for liquefaction.⁶⁵ Based on the geotechnical calculations, the recommendation of the building foundation system consisting of either ground improvement or use of deep foundations would reduce this hazard. Construction of the Project would be subject to the LABC requirements and recommendations included in the required final design-level geotechnical report. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including seismic-related liquefaction. Therefore, impacts related to liquefaction would be less than significant.

iv. Landslides?

No Impact. The topography of Project Site and surrounding area is flat. No landslides exist on or near the Project Site. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. During the Project's construction phase, activities such as excavation below ground surface, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to

⁶⁵ Ibid.

comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction.

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

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized.

Specifically, LAMC Section 91.7006.7 includes requirements regarding import and export of earth material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

Further, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

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

Less Than Significant Impact. Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in the gradual lowering of the overlying ground surface. Based on the available information from California Department of Water Resources (2014) the Site is located within a groundwater basin with documented historic subsidence and designated as having a low to medium estimated potential for future land subsidence. Therefore,

the potential for future subsidence at the Site is considered low to medium. Note that the potential impacts from subsidence would likely be distributed regionally and would not result in impacts at the Site significantly different from those experienced across the region.⁶⁶

The Project Applicant would be required by the LADBS, as part of the permitting process, to submit a final design-level geotechnical report that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with CBC and LABC building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability.

Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and related impacts related to such matters would be less than significant.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Investigation Report prepared for the Project (refer to Appendix E-1), the clayey soils on the Project Site are anticipated to be moderately expansive. The Project would be designed and constructed in conformance with current CBC and LABC requirements and the recommendations of the required final design-level geotechnical report. Thus, the Project would include foundations appropriate for the type of the soil at the Project Site and therefore would not create a substantial risk to individuals and/or property. Based on the above, development of the Project would not cause or exacerbate geologic hazards, and Project impacts with respect to expansive soils would be less than significant.

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

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

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

⁶⁶ Ibid.

Less Than Significant with Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood of unique paleontological resources to occur at the Project Sites (refer to Appendix E-3). The records search revealed that no paleontological resources are known to exist at the Project Site, but resources are known to exist in the Project Site area in the same sedimentary deposits found at the Project Site.⁶⁷ However, with implementation of Mitigation Measure MM-GEO-1, would ensure that Project impacts on unknown paleontological resources would be less than significant.

Mitigation Measure

PRC Section 21151.2 requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City has chosen to incorporate Mitigation Measure PMM GEO-2 from the 2020-2045 RTP/SCS Program EIR (slightly modified for the Project), which would ensure Project impacts related to unknown paleontological resources would be less than significant.

MM-GEO-1 Inadvertent Discovery of Paleontological Resources

In the event that potential paleontological resources are encountered during the Project's ground-disturbing activities, all work within 50 feet of the potential discovery shall cease, and a qualified paleontologist (Project Paleontologist), who meets the Secretary of Vertebrate Paleontology (SVP) standards, has experience working with asphaltic fossil deposits, and is approved by the Natural History Museum of Los Angeles County (LACM), shall be retained. If deemed necessary by the Project Paleontologist, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) shall be prepared. This plan will address specifics of monitoring and mitigation and will comply with the recommendations of the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. This plan (if deemed necessary) will be subject to the approval of the LACM and submitted to them for review before ground disturbance begins.

The Project Paleontologist shall develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources as well as procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground-disturbing work commences and will include handouts to be given to new workers as needed.

All ground disturbances at the Project Site that occur in previously undisturbed older alluvial sediments that have high paleontological potential shall require monitoring. Monitoring shall be conducted by a Paleontological Monitor, who meets the standards defined in the SVP's Standard Procedures for the

⁶⁷ Natural History Museum, Los Angeles County, Alyssa Bell, Ph. D., correspondence, April 16, 2022. Refer to Appendix E-3.

Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Should asphaltic sediments be encountered during excavations, the monitor must also have prior experience or training working in asphaltic sediments and meet the approval of the LACM. Monitoring shall be conducted in accordance with the PRMMP and under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Project Paleontologist and the LACM. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological monitors shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. When monitoring work is completed, the Project Paleontologist shall prepare a report of the findings of the monitoring plan after construction is completed.

In the event of a fossil discovery, whether by the paleontological monitor or a member of the construction crew, all work shall cease in a 50-foot radius of the find while the Project Paleontologist assesses the significance of the fossil and document its discovery. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and in consultation with the LACM. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. The most likely repository is the LACM, and a repository agreement shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development as well as CBC and LABC construction standards that are designed to protect public safety. Impacts with respect to paleontological resources are also assessed on a site-by-site basis. All development in the City (including the Project and related projects) that includes ground-disturbing activities is required to adhere to existing State and City regulations and/or any required mitigation measures related to the discovery of paleontological resources. For these reasons, cumulative impacts related to geology and soils would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The information and analysis in this section are based primarily on the following (refer to Appendix B):

B-1 Air Quality and Greenhouse Gas Emissions Technical Modeling, NTEC, May 2022.

Environmental Setting

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).⁶⁸ Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. The following plans, policies, and regulations are fundamental to the Project’s determination of significance with respect to its GHG emissions and consistency with these documents.

State

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.⁶⁹
- By 2020, reduce statewide GHG emissions to 1990 levels.

CARB was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further required CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The state achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32’s scoping plan requirement and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Arnold Schwarzenegger and Executive

⁶⁸ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

⁶⁹ The 2010 target to reduce GHG emissions to 2000 levels was not met.

Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Climate Change Scoping Plan

In 2008 CARB approved a Climate Change Scoping Plan (AB 32 Scoping Plan) detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e., emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

However, shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED to the Climate Change Scoping Plan (Supplemental FED), approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e., as influenced by the economic downturn) and GHG emissions reduction measures already in place.⁷⁰ Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent, down from the previous 28.5 percent figure.

CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) in 2014. The First Update found that California was on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target, if it realizes the expected benefits of its existing policy goals.⁷¹ CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. As noted earlier, the State achieved its 2020 target that was established by AB 32.

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan). The 2017 Scoping Plan builds upon the successful framework established by the 2008 Scoping Plan and the First Update and identifies new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets in a way that promotes and rewards innovation, continues to

⁷⁰ E.g. the million-solar-roofs program, AB 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016. Pavley I could potentially result in a 27.7 million metric tons CO_{2e} reduction of GHG emissions by 2020. Pavley II covers models years 2017 to 2025 and could result in additional reductions of 4.1 million metric tons CO_{2e}.

⁷¹ The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.

foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources, such as use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.

CARB's 2030 emissions projections for the State take into account 2020 GHG reduction policies and programs. The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, which include the agriculture and forestry sectors. Under the 2017 Scoping Plan scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover most of the 2030 reduction obligation – approximately 34 to 79 MMTCO₂. The State's short-lived climate pollutants strategy, which addresses GHGs that remain in the atmosphere for shorter periods of time than longer-lived GHGs like CO₂, is expected to cover approximately 17 to 35 MMTCO₂e. The Renewables Portfolio Standard with its goal of 50 percent renewable electricity by 2030 is expected to cover approximately 3 MMTCO₂. The mobile source strategy and sustainable freight action plan are expected to cover approximately 11 to 13 MMTCO₂. CARB also expects that doubling the energy efficiency savings in natural gas and electricity end uses by 2030 would cover approximately 7 to 9 MMTCO₂ of the 2030 reduction obligation. Other strategies would be expected to cover the remaining 2030 reduction obligations.

The 2017 Scoping Plan also addresses the role of local governments in meeting the State's GHG reductions goals, because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State's long-term goals, and climate change science. The City of Los Angeles has not developed per capita GHG targets for 2030 or 2050; however, the City recognizes that GHG emission reductions are necessary in the public and private sectors. The City has taken the initiative in combating climate change by developing programs such as the Green New Deal and Green Building Code.

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. According to CARB, this program will help California meet its eventual goal of achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether that electricity is generated in-state or imported. Accordingly, for projects that are subject to the CEQA, GHG emissions from their electricity consumption are covered by the

Cap-and-Trade Program. The program also covers fuel suppliers (e.g., natural gas and propane providers, as well as transportation fuel providers) to address emissions associated with these fuels and their combustion. The Cap-and-Trade Program applies to emissions that encompass approximately 80 percent of the State’s GHG emissions. As noted earlier, California achieved its 2020 GHG reduction target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is covered by the Cap-and-Trade Program.

Renewables Portfolio Standard

SB 1078 required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as a Renewables Portfolio Standard (RPS). Subsequent amendments have provided additional targets throughout the years. For example SB 350 further increased the RPS to 50 percent by 2030. It also required the state to double its statewide energy efficiency savings in electricity and natural gas end uses by 2030. The 2017 Scoping Plan incorporated these standards and estimated that their corresponding GHG reductions would account for approximately 21 percent of the Scoping Plan’s reductions. Most recently in September 2017, SB 100 updated RPS targets to 44 percent by 2024, 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045.

Sustainable Communities and Climate Protection Act (SB 375)

SB 375, adopted by the State in September 2008, established mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, because the transportation sector is the single largest contributor of greenhouse gases of any sector. Under SB 375, CARB – in consultation with the Metropolitan Planning Organizations (MPOs) – is required to set regional GHG reduction targets for passenger vehicle and light-duty truck sectors. These targets must be incorporated within a region’s Regional Transportation Plan (RTP), which is a planning document used for long-term transportation planning. SB 375 and its relevance to the regional RTP/SCS is discussed in more detail later in this section.

Senate Bill 743

In 2013 Governor Jerry Brown signed SB 743, which created a process to change the way transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to the level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Transportation impact metrics may include vehicle miles traveled (VMT), VMT per capita, automobile trip generation rates, or automobile trips generated.

Title 24, Building Standards Code and CALGreen Code

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code. It was developed in part to help the State achieve its GHG reduction goals under AB 32 by codifying standards for reducing building-related energy, water, and resource demand. The purpose of the CALGreen 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.”⁷² The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission.

The current 2019 Title 24 Standards went into effect on January 1, 2020. The 2019 Title 24 Standards ensure that builders use the latest energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the latest standards represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.” Single-family homes built to the 2019 Title 24 Standards are projected to use approximately seven percent less energy than those built under the 2016 standards. Once rooftop solar electricity generation is factored in, these homes would use about 53 percent less energy than those built under the 2016 standards. Non-residential buildings are projected to use approximately 30 percent less energy than those built under the preceding standards. Compliance with Title 24 is enforced through the building permit process. The future 2022 Title 24 Standards will go into effect on January 1, 2023.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project’s effect on the environment, as pursuant to CEQA.

The Guidelines Amendments provide no thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified as follows:

⁷² California Building Standards Commission, 2010 California Green Building Standards Code.

- (1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) 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 GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for the cumulative impact analysis.”⁷³

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

Regional

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.⁷⁴ A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.⁷⁵ The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG

⁷³ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

⁷⁴ SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, <http://www3.aqmd.gov/hb/2008/081231.a.thm>. Accessed June 23, 2022.

⁷⁵ SCAQMD, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed June 23, 2022.

significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS, serves as the roadmap to fulfilling the region's compliance with these latest GHG emissions reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and it acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's HQTAs and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.⁷⁶ HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions. The SB 375 GHG reduction targets for the SCAG region

⁷⁶ SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

correspond with the achievement of reductions in regional VMT per capita. The OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the State’s emissions goals.

Local

City of Los Angeles Green LA Action Plan/Sustainability pLAN

In 2007 the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (“LA Green Plan/Climate LA”). This document outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City’s first “Sustainable City pLAN” that was released in 2015. It augments, expands, and elaborates the City’s vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists “Climate Mitigation” (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.

- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfills by 2028.
- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the LAMC, referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

City of Los Angeles General Plan

The City does not have a General Plan Element specific to climate change and GHG emissions, and its General Plan does not have any stated goals, objectives, or policies that specifically address climate change and GHG emissions. However, the following five goals from the City's General Plan Air Quality Element would have an indirect effect on GHG emissions reductions:

- Less reliance on single-occupancy vehicles with fewer commute and non-work trips.
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting.
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the City Transportation Assessment Guidelines (TAG) (July 2019, updated July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of transportation assessments. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with AB 32, SB 32, SB 375.

Existing Conditions

Existing Statewide GHG Emissions

As reported by the CEC, California contributes approximately one percent of global and 6.4 percent of national GHG emissions.⁷⁷ California contains approximately 12 percent of the national population. CARB reports that in 2019, emissions from GHG emissions statewide were 418 million MT of CO₂e, 7 million MT of CO₂e lower than 2018 levels and nearly 13 million MT of CO₂e below the State's 2020 GHG limit of 431 million MT of CO₂e. Forty-eight percent of the state's total electricity generation (in-state generation plus imported electricity) came from zero-GHG generation sources (e.g., solar, wind, hydropower, nuclear, etc.). Per capita GHG emissions have dropped from a 2001 peak of 14.0 MT per person to 10.5 MT per person in 2019, a 25 percent decrease. The transportation sector remains the largest source of GHG emissions, accounting for almost 40 percent of the State's GHG inventory (though when emissions from extracting, refining, and moving transportation fuels are included, this figure increases to over 50 percent of statewide emissions for 2019).⁷⁸

Existing Project Site Emissions

As stated previously, the Project Site is currently unpaved and vacant. The site contains no land use(s) or other operations that may generate more than nominal anthropogenic emissions of pollutants.

Thresholds of Significance

The City has adopted the thresholds set forth in Appendix G of the CEQA Guidelines as project-specific thresholds of significance. Pursuant to the Appendix G thresholds, the Project would have a significant impact with respect to GHG emissions if it would:

⁷⁷ California Energy Commission. Tracking Progress, Greenhouse Gas Emission Reductions. www.energy.ca.gov/renewables/tracking_progress/documents/Greenhouse_Gas_Emissions_Reductions.pdf. Last updated December 2018.

⁷⁸ CARB, California Greenhouse Gas Emissions for 2000 to 2017. 2019.

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

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

Methodology

For the reasons set forth below, to analyze the Project's GHG impacts under these Appendix G thresholds, the City will utilize a qualitative analysis that will assess the Project's consistency with the following plans, policies, and regulations adopted to reduce GHG emissions:

- Executive Order S-3-05 and AB 32;
- AB 32 Scoping Plan and First Update;
- Executive Order B-30-15, SB 32, and the 2017 Scoping Plan;
- SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, "Connect SoCal");
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles Green New Deal; and
- City of Los Angeles Green Building Ordinance

Additionally, to comply with the requirements of CEQA Guidelines, section 15064.4(a), the analysis includes a good faith estimate of GHG emissions that may result from the project.

The basis for this methodology is as follows: The Department of City Planning has adopted Appendix G as its thresholds of significance, and the Appendix G threshold questions for GHG impacts may be analyzed utilizing a qualitative approach. SCAQMD has not adopted GHG significance thresholds for land use development projects such as the Proposed Project, although it has adopted significance thresholds for industrial-type projects for which it is the lead agency. The SCAQMD industrial thresholds are not relevant to the Project, as the only projects for which the SCAQMD serves as the lead agency are those that involve the adoption of air quality rules or regulations, or projects that have not gone through CEQA environmental review via another lead agency. However, the City is the lead agency for this project. The City has not adopted thresholds for land use development projects based on SCAQMD guidance for these types of projects, and the City has the discretion to adopt a significance threshold relevant to the Project.

On November 30, 2015, the California Supreme Court issued an opinion on significance thresholds under CEQA for the evaluation of impacts associated with GHGs in the case *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife*. The following discussion summarizes the relevant facts and holdings of that case, which assessed the use of

qualitative GHG significance thresholds (i.e., those concerning consistency with applicable plans, programs, and policies) and quantitative GHG significance thresholds (i.e., numerical thresholds).

The Court acknowledged that California air pollution control officials and air quality districts have made several proposals for numerical thresholds. Multiple agencies' efforts at framing GHG significance issues have not yet coalesced into any widely accepted set of numerical thresholds, but they have produced a certain level of consensus on the value of AB 32 consistency as a criterion. Neither AB 32 nor the CARB Scoping Plan related thereto set out a mandate or method for CEQA analysis of GHG emissions from a proposed project. An amendment to CEQA adopted in 2007, however, required the preparation, adoption, and periodic update of guidelines for mitigation of GHG impacts. The resulting direction from the State was that a lead agency should attempt to describe, calculate, or estimate the amount of GHG emissions that a project may emit, but recognized that agencies have discretion in how to do so. CEQA Guideline 15064.4 further provides that when assessing the significance of GHG emissions, the agency should consider these factors (among others): (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) 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 GHG 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 Court also acknowledged that the scope of global climate change and the fact that GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHGs, it does not. As such, GHG concerns are not necessarily locational; they are whether a particular project, which will accommodate California's housing and/or economic development needs, is sustainable. A significance criterion framed in terms of efficiency and conservation in land use (as compared to a business-as-usual [BAU] pattern of growth) is superior to a simple numerical threshold because CEQA is not intended as a population control measure.

Furthermore, the Court stated that this consideration favors consistency with AB 32's statewide goals as a permissible significance criterion for project GHG emissions. Meeting statewide reduction goals does not preclude all new development. Rather, the AB 32 Scoping Plan – which is the State's roadmap for meeting AB 32's GHG reduction target – assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary for the entire state, one can reasonably argue that its impact is not cumulatively considerable, because it would be helping to solve the cumulative problem of GHG emissions as envisioned by California law. Given the reality

of growth, some GHG emissions from new housing and commercial developments are inevitable. The critical CEQA question is the cumulative significance of a project's GHG emissions, and, as discussed previously, from a climate change perspective it does not matter where in the State those emissions are produced. Under these circumstances, evaluating the significance of a project's GHG emissions with respect to their effect on the State's efforts to meet its long-term goals is a reasonable threshold. Accordingly, a significance threshold based on a project's consistency with plans aimed at reducing GHG emissions is permitted under CEQA.

The Supreme Court in *Center for Biological Diversity* recognized potential options for analyzing the cumulative significance of a project's GHG emissions, including:

- Business-as-usual (BAU) Model. BAU comparison based on the Scoping Plan methodology if supported by substantial evidence that the utilized metric supports what level of reduction from BAU a new land use development at the proposed location must contribute to comply with state goals.
- Consistency with AB 32's goal in whole or in part by looking at compliance with regulatory programs designed to reduce GHG; provided the project complies with or exceeds the regulations that were adopted by CARB or state agencies to comply with the Scoping Plan; and provided, the significance analysis only relates to impacts within the area governed by the regulation (for example, reliance on Title 24 energy efficiency rules that are intended to reduce GHG from buildings would not address GHG impacts from transportation). And/or showing consistency with local GHG reduction plans, (e.g., climate action plan), to provide a basis for the tiering or streamlining of project-level CEQA analysis, including as consistent with CEQA Guidelines Section 15183.3.
- Relying on numerical thresholds for significance for GHG emissions.

In 2019 CEQA Guidelines Section 15064.4 was amended to incorporate the holding in the *Center for Biological Diversity* case as well as others. The section now directs lead agencies as follows:

§ 15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

- (1) Quantify greenhouse gas emissions resulting from a project; and/or
- (2) Rely on a qualitative analysis or performance based standards.

(b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) 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 (see e.g., section 15183.5(b)). 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. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

(c) A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Based on the above legal standards, the City finds that analyzing the Project's GHG emissions through consistency with the plans, policies, and regulations identified above that have been adopted to reduce GHG emissions is the appropriate methodology to analyze the Project's GHG impacts in the context of the GHG threshold questions set forth in Appendix G.

Using consistency with AB 32's statewide goal for GHG reduction, and subsequently adopted plans, programs, policies, standards, and regulations as identified above, rather than a numerical threshold, as a significance criterion is also consistent with the broad guidance provided by Section 15064.4 of the CEQA Guidelines to reflect that there is no iron-clad definition of significance pertaining to this matter. Section 15064.4 was not intended to restrict agency discretion in choosing a method for assessing GHG emissions, but rather to assist lead agencies in investigating and disclosing all that they reasonably can regarding a project's GHG emissions impact.

The basis for this analysis' estimate of the Project's GHG emissions is as follows: As stated above, CEQA Guidelines Section 15064.4(a) establishes that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe and estimate the amount of greenhouse gas emissions resulting from a project. CEQA Guidelines Section 15064.4(c) states a lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project and that the lead agency has the discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account a project's incremental contribution to climate change.

Based upon this guidance, GHG emissions associated with the Project's construction and operations were estimated using the California Emissions Estimator Model (CalEEMod). Construction emissions are those that would result from the construction of the Project. Operations emissions include those related to both direct and indirect sources such as mobile sources, water use, solid waste, area sources, natural gas, and electricity use. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professions 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 in California. The City is not required to use a numerical GHG threshold or another methodology that relies on a quantitative analysis. As such, the Project's GHG emissions have been estimated and disclosed to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies, and regulations adopted to reduce GHG emissions will result in actual GHG reductions.

Analysis

Less Than Significant Impact. The Appendix G thresholds questions concerning GHG emissions are addressed together in the following analysis:

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

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

Less Than Significant Impact. Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Plan Consistency

The following section assesses the extent to which the Project would be consistent with the following relevant plans, policies, and regulations adopted for the purpose of reducing GHG emissions:

- Executive Order S-3-05 and AB 32;
- AB 32 Scoping Plan and First Update;
- Executive Order B-30-15, SB 32, and the 2017 Scoping Plan;
- SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, "Connect SoCal");
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles Green New Deal; and
- City of Los Angeles Green Building Ordinance

With respect to the two Executive Orders listed above and the legislation that was codified in response to those orders (e.g., AB 32 and SB 32, respectively), CARB's Scoping Plans provide for strategies and programs aimed at achieving the GHG reduction goals in those orders and their corresponding legislation. For example, the 2017 Scoping Plan states that it "establishes a path that will get California to its 2030 target" and "identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40 percent from 1990 levels." Similarly, CARB's First Update provides that it "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." Many of the emissions reduction strategies recommended by CARB would serve to reduce the Project's GHG emissions to the extent required by applicable. An overview of mandatory regulatory measures contained within CARB's Scoping Plans and the effect that they would have on the Project's GHG emissions is included in Table VIII-1, below.

Statewide

Executive Order S-03-05, AB 32, AB 32 Scoping Plan, and First Update

AB 32 adopted and codified Executive Order S-3-05's goal of reducing GHG emissions to 1990 levels by 2020. As noted previously, California achieved this target four years earlier than mandated. The AB 32 Scoping Plan and 2014 First Update outlined and provided the basis for policies that helped California achieve this target by 2020, as well as for policies that will help

California continue its GHG emissions reductions beyond 2020. Thus, it follows that if the Project would be consistent with the AB 32 Scoping Plan and the 2014 First Update, then the Project would be consistent with State efforts to continue its achievement of the 2020 target that was established by Executive Order S-3-05 and codified by AB 32.

Table VIII-1 contains an overview of applicable reduction actions/strategies (categorized by emissions source type) that are outlined in the AB 32 Scoping Plan and its later iterations. The overview provides context surrounding various measures that would indirectly reduce the Project's GHG emissions via their current, future, or continued implementation.

Table VIII-2 provides a more specific evaluation of the Project's consistency with applicable strategies of the AB 32 Scoping Plan and First Update. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan and First Update. Therefore, the Project would be consistent with State efforts to maintain achievement of the 2020 target that was established by Executive Order S-3-05 and codified by AB 32.

**Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan**

Mandatory Regulatory Compliance Measures
<p>Energy</p> <p>RPS Program and SB 2X: The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020, 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also required 50 percent renewables by 2030.^A LADWP reports that, as of 2019, it has achieved 34% renewables.^B The CalEEMod default carbon intensity for electricity generated by LADWP is based on utility-provided data from 2021, so it presumably takes into account the 33 percent renewables requirement for 2020.^C</p> <p>However, with the recent passage of SB 100, LADWP (along with other electric utilities) is required to increase its renewable energy portfolio to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. Additionally, the City's latest Green New Deal sets a target for LADWP to supply 55 percent renewable energy by 2025 and 80 percent by 2036. For 2045, the Green New Deal and SB 100 share the same 100 percent renewables requirement. The Project would comply with these percentage renewables requirements as the Project is served by LADWP, which is tasked with achieving these GHG reduction mandates.</p> <p>The Project's electricity GHG emissions in this analysis do not account for these rapidly changing and escalating renewables requirements. By the Project buildout year of 2025^D, it is reasonable to assume that LADWP may supply at least 55 percent renewable energy, in line with the Green New Deal's 55% target for 2025. As such, GHG emissions from the Project's electricity use would likely be lower than what is identified in this analysis.</p>

Table VIII-1

Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
<p>SB 350: As required under SB 350, a 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, the California Energy Code, and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.</p>
<p>Cap-and-Trade Program: As required by AB 32 and the AB 32 Scoping Plan, the Cap-and-Trade Program regulates GHG emissions associated with electricity demand, though the program applies to electricity service providers and not directly to development projects. The Project's electricity consumption would benefit from GHG reductions associated with this Statewide program. The Cap-and-Trade program also covers GHG emissions from the combustion of transportation fuels.</p>
<p>Mobile</p>
<p>Advanced Clean Cars Program: CARB's Advanced Clean Cars Program regulates GHG emissions for model years 2017 through 2025 and increases the share of zero emission vehicles manufactured in model years 2018 through 2025. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks sold within California. Mobile source GHG emissions in this analysis do not include the additional 34 percent reductions in mobile source emissions attributable to this program as the CalEEMod model does not account for it. The Project would support this regulation as it would include electric vehicle charging facilities.</p> <p>Other mobile source strategies are related to CARB's development of the Innovative Clean Transit and Advanced Clean Trucks programs. The Innovative Clean Transit regulation, adopted in December 2018, requires all public agencies to gradually transition to 100-percent zero-emission bus fleets, in part by mandating that all new bus purchases are zero-emission starting in 2029. Adopted in March 2021, the Advanced Clean Trucks regulation sets increased sales requirements for zero-emission trucks from 2024 to 2035 and contains company and fleet reporting requirements for large employers and fleet owners. The Project would indirectly benefit from both of these measures.</p> <p>Additionally in September 2020, Governor Gavin Newsom issued Executive Order N-79-20, which directs CARB to develop and propose:</p> <ul style="list-style-type: none">• Passenger vehicle and truck regulations that would require increasing volumes of new zero-emission vehicles to be sold in the State, including a target of 100 percent of in-state sales by 2035.• Medium- and heavy-duty vehicle regulations that would require increasing volumes of new zero-emission trucks and buses sold and operated in the State. This includes a target that 100 percent of the in-state fleet be zero-emission by 2045, as feasible, and that 100 percent of drayage trucks be zero-emission by 2035.• Strategies to achieve 100 percent zero-emissions from off-road vehicles and equipment operations in the State by 2035. <p>The Project would indirectly benefit from this order over time as these goals are realized. Regulations pursuant to this goal would be issued by CARB as part of its Zero-Emission Vehicle (ZEV) program, which is itself part of the Advanced Clean Cars Program.</p>

Table VIII-1

Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
<p>Low Carbon Fuel Standard (LCFS): The LCFS reduced the carbon intensity of California’s transportation fuels by at least 7.5 percent by 2020. The CalEEMod model assumes that the LCFS reduces mobile source emissions accordingly. The 2018 updates to the LCFS target a 20 percent reduction in carbon intensity by 2030. CalEEMod does not take into account these updates to the LCFS. The Project’s GHG emissions would benefit from this regulatory program over time.</p>
<p>Solid Waste</p> <p>California Integrated Waste Management Act of 1989: This regulation required jurisdictions to reduce solid waste by 50 percent by 2000. In 2011, AB 341 amended this regulation to provide a goal of reducing solid waste generation by 75 percent by 2020, and annually thereafter. The Project complies with these diversion requirements as it would be served by the City of Los Angeles, which currently achieves a 76 percent diversion rate. The CalEEMod model conservatively assumes a zero percent diversion rate; as a result, GHG emissions from the Project’s solid- waste generation are conservative and would be lower. The Project would contract for waste disposal services from a provider that must meet AB 341 mandates for diversion. Additionally, it is worth noting that the City in its Green New Deal has committed to achieving 100 percent diversion of waste by 2050.</p>
<p>^A <i>SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.</i></p> <p>^B <i>LADWP. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=waa2z9fpa_4&_af)))&&_afrLoop=292271719357341. Accessed June 27, 2022.</i></p> <p>^C <i>CalEEMod Version 2020.4.0 Appendix C. May 2022.</i></p> <p>^D <i>At the time the Project’s CalEEMod analysis was prepared, it was anticipated that the Project’s buildout year would be 2025 – one year earlier than assumed by the Project’s traffic analysis. As emissions from energy, mobile, and other sources generally are assumed to decrease over time, this results in a conservative analysis. A 2026 buildout year would result in slightly lower emissions.</i></p>

Table VIII-2

Consistency with the AB 32 Scoping Plan and First Update GHG Emissions Reduction Strategies

Strategy/Recommended Action	Project Consistency
<p>California Cap-and-Trade Program: Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.</p>	<p>Not Applicable. This recommended action called upon the State to develop a cap-and-trade program, which has been implemented. Though the Project would not be relevant to this action, as discussed, the Project would benefit from GHG reductions associated with the State’s Cap-and-Trade Program because the program applies to electricity usage and transportation fuels.</p>
<p>California Light-Duty Vehicle Greenhouse Gas Standards: Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.</p>	<p>Not Applicable. This recommended action called upon the State to develop and implement light-duty vehicle standards related to GHG emissions. The development of these standards is not relevant to the Project. However, as discussed, the Project would benefit from previous, existing, and future standards related to this action (i.e., Advanced</p>

Strategy/Recommended Action	Project Consistency
	Clean Cars Program) that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
<p>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 (including both investor-owned and publicly-owned utilities).</p>	<p>Consistent. The Project would be designed to meet the CALGreen building standards that are in effect at the time of its permitting. As discussed previously, the latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.</p>
<p>Renewables Portfolio Standard: Achieve 33 percent renewable energy mix statewide by 2020.</p>	<p>Consistent. As noted earlier, LADWP reports that it achieved a 34-percent renewables mix by 2019, ahead of the 2020 mandate. As LADWP would provide electricity service to the Project, the Project would use electricity that is consistent with this recommended action.</p> <p>As also noted, LADWP is tasked with achieving the latest SB 100, SB 350, and Green New Deal renewables mandates, which go beyond the 33 percent by 2020 target identified in this recommended action. As a result, the Project would utilize electricity that goes beyond this action's target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.</p>
<p>Low Carbon Fuel Standard: Develop and adopt the Low Carbon Fuel Standard.</p>	<p>Not Applicable. This recommended action called upon the State to develop and implement the LCFS. The LCFS originally went into effect in April 2010. As discussed earlier, the latest LCFS update targets a 20 percent reduction in carbon intensity by 2030, which goes beyond the reduction that the AB 32 Scoping Plan had targeted for 2020. Thus, Project-related vehicles that use fuels subject to the LCFS would achieve GHG emissions reductions that go beyond the target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.</p>
<p>Regional Transportation-Related Greenhouse Gas Targets: Develop regional greenhouse gas emissions reduction targets for passenger vehicles.</p>	<p>Not Applicable. This recommended action called upon the State to develop regional greenhouse gas emissions reduction targets for passenger vehicles via SB 375. To be discussed in greater detail below, the Project would be consistent with SCAG's latest 2020-2045 RTP/SCS. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions 19 percent by 2035 and enable the</p>

Strategy/Recommended Action	Project Consistency
	SCAG regional to fulfil its portion of SB 375 compliance.
Goods Movement: Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. This recommended action called upon State agencies to implement regulations for promoting efficiency in goods movement.
Million Solar Roofs Program: Install 3,000 MW of solar-electric capacity under California's existing programs.	Not Applicable. This recommended action restated a goal, as part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, to install 3,000 MW of new solar capacity by 2017. The Program reached its one-million solar roofs goal in 2019 and has installed nearly three-times the 3,000 MW target capacity.
Medium/Heavy-Duty Vehicles: Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures for vehicles.
Industrial Emissions: Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	Not Applicable. The Project does not propose the types of large industrial sources that are covered by this measure (e.g., power plants, refineries, cement plants, etc.).
High Speed Rail: Support implementation of a high-speed rail system.	Not Applicable. This recommended action called upon the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
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. As discussed above, the Project would be designed to meet the CALGreen building standards that are in effect at the time of its permitting. The latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
High Global Warming Potential Gases: Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste: Reduce methane emissions and landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	Consistent. This recommended action does not include specific or quantifiable goals for the recycling and waste sector. In the Green New Deal, the City has committed to achieving a 100 percent diversion rate of waste by 2050. The Project would contract with a waste disposal services provider

Strategy/Recommended Action	Project Consistency
	that meets AB 341 and City requirements for waste diversion.
Sustainable Forests: Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource agency departments are responsible for implementing this measure.
Water: Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. This recommended action does not include specific or quantifiable goals for the water sector. However, the Project would be designed to meet the CALGreen building standards and other water efficiency measures that are in effect at the time of its permitting. As noted, California achieved its 2020 AB 32 GHG emissions reduction target four years ahead of schedule. It reasons that the CALGreen building standards and other applicable water efficiency measures would be capable of achieving or exceeding water-sector-related reductions outlined in the First Update.
Agriculture: In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. This recommended action concerned methane capture at large dairy facilities.
Source: NTEC, 2022.	

Executive Order B-30-14, SB 32, and 2017 Scoping Plan

SB 32 adopted and codified Executive Order B-30-15’s goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Scoping Plan addresses how this target may be achieved. Specifically, it states that the Plan “establishes a path that will get California to its 2030 target” and “identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40 percent from 1990 levels.” The 2017 Scoping Plan also acknowledges how many emission reduction strategies would establish “a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.” The 2017 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some 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. The 2017 Scoping Plan outlines and provides the basis for policies that are anticipated to help California achieve its targeted GHG emissions reductions for 2030 and beyond. Thus, it follows that if the Project would be consistent with the 2017 Scoping Plan, then the Project would be consistent with State efforts to achieve the 2030 GHG emissions target that was established by Executive Order B-30-15 and codified by AB 32. It also follows that the Project would be consistent with efforts to progress “on the path” to the 2050 target, as well.

Table VIII-3 provides a specific evaluation of the Project’s consistency with applicable strategies of the 2017 Scoping Plan. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan. Therefore, the Project would be consistent with State efforts to achieve the 2030 GHG emissions reduction target that was established by Executive Order S-3-05 and codified by AB 32. The Project would also be consistent with efforts to progress “on the path” to the 2050 target, as well.

**Table VIII-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Senate Bill 350 (SB 350):</p> <ul style="list-style-type: none"> • Requires 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. • 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. 	<p>CPUC, CEC, CARB</p>	<p>No Conflict. As LADWP would provide electricity service to the Project Site, and as LADWP is tasked with achieving the latest SB 100 and Green New Deal renewables mandates that exceed the prior SB 350 mandates, the Project would use electricity that goes beyond the renewables requirements of SB 350.</p> <p>The Project would also comply with the latest CalGreen and Title 24 energy efficiency standards that are in effect at the time of its permitting.</p>
<p>Senate Bill 100 (SB 100):</p> <p>The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026, and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources and achieve 44 percent of retail sales by December 31, 2024, and 60 percent by December 31, 2030.</p>	<p>LADWP, CPUC</p>	<p>No Conflict. As discussed, LADWP is required to generate electricity that would achieve these renewables mandates. As LADWP would provide electricity service to the Project, the Project would use electricity that is consistent with the requirements of SB 100.</p>
<p>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</p> <ul style="list-style-type: none"> • 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 	<p>CARB, CalSTA, SGC, CalTrans, CEC, OPR, Local agencies</p>	<p>No Conflict. GHG emissions generated by Project-related vehicular travel would benefit from the proposed regulations, and mobile source emissions generated by the Project would be reduced with the implementation of standards under the Advanced Clean Cars Program, consistent with the reduction of GHG emissions under AB 32. However, mobile source GHG emissions</p>

**Table VIII-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Advanced Clean Cars regulations.</p> <ul style="list-style-type: none"> • Medium and heavy-duty GHG Phase 2 • Innovative Clean Transit • Last Mile Delivery • 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.” 		<p>estimates do not include the additional 34-percent reduction in mobile source emissions attributable to this program. The Project would support this regulation as it would include electric vehicle charging facilities (128 EV parking spaces, of which 43 would be EVCS).</p> <p>The Project would indirectly benefit from CARB’s Innovative Clean Transit and Advanced Clean Trucks programs, which were adopted in December 2018 and March 2021, respectively.</p> <p>With regard to SB 375, the Project’s consistency with SCAG’s latest 2020-2045 RTP/SCS is discussed later. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.</p>
<p>Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)</p>	<p>CARB</p>	<p>No Conflict. The Project’s consistency with SCAG’s latest 2020-2045 RTP/SCS is discussed later in this report. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.</p>
<p>By 2019, adjust performance measures used to select and design transportation facilities.</p> <p>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).</p>	<p>CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans</p>	<p>Not Applicable. The Project would not involve the construction of any transportation facilities. However, the Project’s proximity to high quality bus stops and a future D Line station would promote the use of transit options by Project residents and users. Further, the Project would be located in a “Pedestrian Enhanced District” (per the City’s Mobility Plan 2035), which means that the Project would be located in an area that the City has identified and targeted for prioritized pedestrian improvements and funding.</p>

**Table VIII-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		The Project's addition of dense multi-family housing to this area would help leverage any future transit and pedestrian-related investments and improvements to the area.
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	No conflict. The Project would support this policy as it would include 128 EV parking spaces, of which 43 spaces would be EVCS.
Implement California Sustainable Freight Action Plan: <ul style="list-style-type: none"> • 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. 	CalSTA, CalEPA, CNRA, CARB, CalTrans, CEC, GoBiz	Not Applicable. This action/strategy calls upon State agencies and regulators to implement recommendations of the California Sustainable Freight Action Plan. The Project would not include freight transportation or warehousing uses.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	No Conflict. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. 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 the LCFS. CalEEMod, which was used to estimate the Project's GHG emissions, accounts for the LCFS when calculating mobile source GHG emissions.
Implement the Short-Lived Climate Pollutant Strategy by 2030: <ul style="list-style-type: none"> • 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	No Conflict. The Project would comply with the CARB Short-Lived Climate Pollutant (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 the Project. Under SB 1383, the

**Table VIII-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 75-percent reduction in the level of statewide disposal of organic waste (from 2014 levels) by 2025.
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 the Project. 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: <ul style="list-style-type: none"> • Protect land from conversion through conservation easements 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. 	CNRA and departments within, CDFA, CalEPA, CARB	Not Applicable. This applies to State regulators and is not applicable to the Project. This regulatory program applies to Natural and Working Lands, and it is 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.
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 the Project. This regulatory program applies to Natural and Working Lands, and it is 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 the Project. This regulatory program applies to state and federal forest land,

**Table VIII-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		and it is 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 and Local Agencies	Not Applicable. This applies to State regulators and is not applicable to the 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.
<i>Source: CARB, California's 2017 Climate Change Scoping Plan, November 2017.</i>		

Regional

2020-2045 RTP/SCS

As noted earlier, SCAG’s latest 2020-2045 RTP/SCS (is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

Generally, projects are considered consistent with the provisions and policies of applicable City and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Development of the Project would be consistent with this land use pattern and related smart growth policies to increase housing density within HQTAs and along Livable Corridors. Not only would the Project be located within an HQTA and along a Livable Corridor, but the Project also qualifies as a TOC Tier 3 site based on its proximity to high quality bus stops and a future D Line Station.

The Project would also be located within a “Pedestrian Enhanced District” (per the City’s Mobility Plan 2035), which means that the Project would be located in a district that the City has identified and targeted for prioritized pedestrian improvements and funding. The Project’s addition of dense multi-family housing to this district would help leverage any future pedestrian-related investments to the location and further contribute to the 2020-2045 RTP/SCS’s goal of encouraging growth of walkable communities with ready access to transit infrastructure.

By developing dense residential housing in an existing low-intensity infill location (i.e., a vacant lot) that is also within an HQTAs a Livable Corridor and a Pedestrian Enhanced District, the Project would contribute directly to the goals of SCAG’s 2020-2045 RTP/SCS. Given these considerations, the Project is appropriately located and supports the 2020-2045 RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in an effort to reduce VMT and related GHG emissions.

Additionally, it is worth noting that the Project is estimated to result in a daily average household VMT per capita of 4.7, which is less than the 6.0 impact threshold for its Area Planning Commission. This 6.0 household VMT per capita threshold is itself 15 percent below the Area Planning Commission’s average, meaning that the Project would result in a household VMT per capita that is over 30 percent below the Area Planning Commission’s average. This would substantially exceed the 2020-2045 RTP/SCS’s objective of reducing daily VMT per capita by 5 percent by 2045 across the SCAG region.

Table VIII-4 includes further discussion regarding the Project’s consistency with the applicable GHG-related performance measures and objectives of the 2020-2045 RTP/SCS.

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis ^a
Increase percentage of region’s total household growth occurring within HQTAs.	Not Applicable. The Project would add 290 dwelling units to the region’s housing stock, all of which would be located within a HQTAs.
Increase percentage of the region’s total employment growth occurring within HQTAs.	No Conflict. The Project would include 7,500 square feet of restaurant space, and it would also create jobs related to the leasing and maintenance of its residential uses. The Project would not inhibit job growth within this or other HQTAs.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	No Conflict. The Project is an urban infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	No Conflict. As discussed, the Project is projected to result in a household VMT per capita that is over 30% below the Area Planning Commission’s average. This is mainly due to the Project’s abundant high quality transit options, which is reflected by the site’s TOC Tier 3 designation. Other VMT reducing TDM strategies will be employed such as provision of 184 bicycle parking spaces and unbundling the residential parking spaces from the units.
Decrease average daily distance traveled for work and non-work trips (in miles)	No Conflict. Same as above.
Increase percentage of work and non-work trips which are less than 3 miles in length.	No Conflict. The Project is an urban infill development, and its proximity to communities with a high density of housing, jobs, and other destinations, all in a transit-rich environment near Job Centers, would increase the percentage of trips that are less than three miles in length.

**Table VIII-4
Consistency with the 2020-2045 RTP/SCS**

Objectives	Consistency Analysis^a
Increase share of short trip lengths for commute purposes.	No Conflict. Same as above.
Decrease average minutes of delay experienced per capita due to traffic congestion.	No Conflict. The nature of the Project as an urban infill development; its proximity to communities with a high density of housing, jobs, and other destinations; and its location in an HQTAs near multiple Job Centers would help reduce the rate of traffic and congestion growth.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	No Conflict. For similar reasons as above, the Project would help reduce traffic congestion-related delays for general vehicles.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	No Conflict. As stated above, the Project would help reduce traffic congestion-related delays for general vehicles. Additionally, because of the Project's proximity to communities with a high density of housing, jobs, and other destinations, including multiple Job Centers, the share of PM peak period trips that are less than 45 minutes would increase as compared to a scenario in which the Project is developed in an urban sprawl location, or an alternate infill location farther from employment centers and less well served by transit infrastructure (i.e., non HQTAs or TPAs).
Increase percentage of trips that use transit (work and all trips)	No Conflict. The Project's location in an HQTAs, TPA and Pedestrian Enhanced District would encourage transit use by future residents and other project users and help increase transit mode share.
Decrease average travel time to work (all modes)	No Conflict. For the reasons discussed above, the Project would be consistent with this objective.
Increase percentage of trips using either walking or biking (by trip type)	No Conflict. The Project would be located within a "Pedestrian Enhanced District," meaning that the Project would be located in a district that the City has identified and targeted for prioritized pedestrian improvements and funding. The Project's addition of dense multi-family housing to this district would help increase pedestrian mode share. The Project would also provide 184 bicycle parking spaces for residents and commercial users, which would encourage bicycle use.
Reduce per capita GHG emissions (from 2005 levels)	No Conflict. As discussed throughout this analysis, the Project would be consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	No Conflict. For the reasons discussed above, the Project would be consistent with this objective.
<i>Source: Southern California Association of Governments; 2020–2045 RTP/SCS; September 2020.</i>	

Local

City of Los Angeles Mobility Plan 2035

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 reductions via a more sustainable transportation system. The Project is consistent with these general objectives for many, if not all, of the same reasons that it is consistent with SCAG’s RTP/SCS, which prioritizes similar strategies to reduce GHG emissions from transportation. As discussed above, the Project would support smart growth strategies to efficiently coordinate land usage and transportation to reduce transportation-related GHG emissions.

Sustainable City pLAN/Green New Deal

The Sustainable City pLAN, a mayoral initiative, includes both short-term and long term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Though the Sustainable City pLAN and its update, the City’s Green New Deal, are not plans that have been adopted solely to reduce GHG emissions, the Green New Deal includes climate mitigation as one of eight explicit benefits that help define its strategies and goals.

Generally, these plans provide information as to how the City will manage buildings and infrastructure in its control. They also provide specific targets related to housing and development, as well as mobility and transit. For example, targets include reducing VMT per capita by 5 percent by 2025 and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The latest Green New Deal document establishes targets such as achieving 100 percent renewable energy by 2045, diverting 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAN and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City’s commitment to the goal and aspirations outlined in these documents. An overview of how the Project relates to actions and measures contained in the Green New Deal is contained in Table VIII-5, below.

Table VIII-5

Consistency with Applicable GHG Emissions Goals and Actions of LA’s Green New Deal

Action	Description	Consistency Analysis
Focus Area: Renewable Energy		
Increase cumulative MW by 2025; 2035; and 2050 of: <ul style="list-style-type: none"> • Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. • Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. • Demand response (DR) programs to 234 MW 	The City would provide community solar programs for low income and renter households. The City would launch a “Virtual Net Energy Metering” program. The City would streamline permitting processes for energy storage projects and would pilot technology for dispatchable and customer-side storage. The City would investigate bidirectional smart-grid technologies to prepare for large-scale adoption of EVs. The City would implement a	No Conflict. These actions apply to the City. The Project would be built according to CALGreen and CEC requirements regarding photovoltaic systems and solar readiness. The Project would also include 128 EV parking spaces (of which 43 spaces would be EVCS), which would help leverage the City’s commitment to EV-related smart-grid technology improvements.

(2025) and 600 MW (2035).	communication network to enable use of smart meters.	
Focus Area: Local Water		
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.	The City would build upon the success of the Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs.	No Conflict. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be built consistent with relevant California Plumbing Code, CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code standards that apply at the time of the Project's permitting.
Focus Area: Clean and Healthy Buildings		
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.	The City would perform a complete building electrification study and develop supporting programs. Financing and incentives would be expanded in existing energy efficiency and solar incentive programs.	No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of CALGreen and the Los Angeles Green Building Code. The Project would be subject to the latest Title 24 Standards or future standards, which are a major step towards achieving future zero net energy goals.
Reduce building energy use per square feet for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus	No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of CALGreen and the Los Angeles Building Code.
Focus Area: Mobility and Public Transit		
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050.	The City would launch a regionally coordinated working group of mobility partners to encourage shared, sustainable mobility options. The City would support the implementation of a congestion pricing pilot. The City would identify opportunities to improve pedestrian comfort and update City standard plans for public works projects to integrate pedestrian-centric design	No Conflict. This action primarily applies to the City. However, the Project would be supportive of this action. The Project would be located in a HQTAs, TPA, and a Pedestrian Enhanced District. The Project would also provide 184 bicycle parking spaces for residential and commercial users. As discussed, these and other factors would increase transit and active mode share.

	into applicable projects. The City would implement Vision Zero safety improvements. The City would improve travel time on the County bus network by 30 percent by expanding DASH service and executing a suite of bus and transit corridor facility improvements. The City would continue to buildout out its subway and light rail network. The City would expand the bike land network by 20 lane-miles per year and increase bicycle-supportive infrastructure like public bicycle parking. The City would expand electric car sharing options.	
Reduce Vehicle Miles Travelled (VMT) per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.	The City would update the Transportation Demand Management (TDM) ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to ease congestion. The City would launch a user-friendly searchable app mapping all curbside designations throughout the City. It would also expand the Metro Bike Share program to at least three new neighborhoods.	No Conflict. Same as above.
<i>Source: Sustainable City pLAn 2019 ("L.A.'s Green New Deal").</i>		

Plan Consistency Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Project GHG Emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project's impact less than significant. In support of the consistency analysis provided above, the following quantitative estimates of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- Construction: emissions associated with construction-related equipment and vehicle use.
- Area Sources: emissions associated with the on-site use of powered equipment.
- Energy Sources: emissions associated with the Project’s electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: emissions associated with the Project’s related vehicle travel.
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction

Project construction is anticipated to last approximately 32 months. GHG emissions associated with the construction of the Project were estimated for each year of construction activity and summed. As shown in Table VIII-5, construction of the Project is estimated to generate approximately 2,362.6 MTCO_{2e}. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project’s annual operational emissions) in order to determine the Project’s annual GHG emissions inventory.⁷⁹ This results in annual Project construction emissions of approximately 78.8 MTCO_{2e}.

**Table VIII-5
Construction-Related GHG Emissions**

Year	Emissions (MTCO_{2e})
2023	1,001.3
<i>Haul Day Adjustment^A</i>	49.5
2024	785.9
2025	525.9
Total	2,362.6
Amortized over 30 years	78.8
^A GHG emissions associated with the Project’s grading phase hauling were modeled separately and then added to the Project’s construction GHG emissions inventory. GHG emissions attributable to hauling that were included in the primary (i.e., non-haul day) CalEEMod estimates were deducted in order to avoid “double counting” hauling emissions from both CalEEMod models. Source: NTEC, 2022.	

⁷⁹ SCAQMD Governing Board Agenda Item 31. December 5, 2008.

Operations

Table VIII-6 shows the Project’s estimated GHG emissions from operations, including the Project’s annualized construction-related GHG emissions. As shown, operation of the Project at buildout is estimated to result in approximately 2,954.7 MTCO_{2e} per year.

It should be noted that the mobile source emissions shown in Table VIII-2 do not reflect the Project’s estimated 11,780 daily VMT. Instead, the emissions reflect CalEEMod default VMT assumptions for the Project, which do not incorporate the various factors and considerations that were accounted for in the Project’s VMT analysis. As a result, the emissions are based on a conservative CalEEMod estimate of 15,083 daily VMT for the Project. This means that the Project’s mobile source GHG emissions are overestimated based on the utilization of CalEEMod’s VMT projection, which is approximately 28 percent greater than the VMT projection that has been more thoroughly analyzed in the Project’s VMT analysis and calculated with the City’s VMT calculator.

**Table VIII-6
Operations-Related GHG Emissions at Project Buildout**

Source	Emissions (MTCO _{2e})
Area	5.0
Energy	811.3
Mobile	1,789.8
Solid Waste	112.0
Water/Wastewater	157.8
Construction	78.8
Total Emissions	2,954.7
<i>Source: NTEC, 2022.</i>	

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The information and analyses presented below are primarily based on the following (refer to Appendix F):

F-1 Phase I Environmental Site Assessment, Geosyntec, August 6, 2021.

F-2 Phase II Environmental Site Assessment, Geosyntec, April 28, 2022.

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

Less Than Significant Impact. During the Project's construction phase, the types of hazardous materials that could be used would include materials such as paints, solvents, fuel for construction equipment, building materials, etc. Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The Project includes the development of residential and commercial uses. The types of hazardous materials that would be found on the Project Site during the Project's operational phase would be those typically associated with residential and commercial land uses – paints, cleaning supplies, small amounts of petroleum products, etc. The use of these materials would comply with all applicable federal, state, and local regulations. Therefore, the Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. As such, Project impacts related to this issue would be less than significant.

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

Less Than Significant with Mitigation Incorporated. Geosyntec Consultants prepared a Phase I Environmental Site Assessment (Phase I ESA) for the Project Site in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13 (refer to Appendix F). The purpose of the Phase I ESA was to determine if there are any recognized environmental concerns (RECs) associated with the Project Site.⁸⁰ The *Phase I ESA* included a review of current and historical records associated with on- and off-site uses; a property inspection and viewing of adjacent and surrounding properties for conditions that could be RECs; interviews with present and past owners, operators and/or occupants of a property, and local government officials; and an evaluation of the information gathered as part of the records review, site reconnaissance, and interviews.

The Phase I ESA (prepared by Geosyntec, August 6, 2021) identified the following:

Known Impacts on the Site – Former Auto Repair Shop: The Site was occupied by an automotive repair shop from 1948 to 2007. An investigation conducted in the northern portion of the Site in 2012 and 2013 identified residual petroleum fuel-related and chlorinated VOCs in soil, soil vapor, and/or groundwater. The constituents detected in groundwater exceeded their most conservative screening levels.⁸¹ The elevated concentrations in Site media and likelihood of a vapor intrusion condition for future residential or commercial Site buildings represent a REC.

⁸⁰ An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

⁸¹ The screening levels included California Department of Toxic Substances Control (DTSC)-modified Human and Ecological Risk Office (HERO) Note 3 Screening Levels, United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs; TR=1E-

Undocumented Fill Material: A geotechnical survey conducted on the Site in 2012 identified fill material in the upper 3 feet to 5 feet below ground surface (bgs). Previous reports by others document the presence of sandy silts and sandy clays; no documentation was found to indicate the presence of refuse or manmade materials in the fill. Geosyntec did not encounter records showing the source of this material and thus, the fill may be impacted with hazardous materials and is considered an REC.

Matrix Collision Repair Facility, 1016-1018 La Cienega Boulevard (north adjoining and hydraulically upgradient of the Site): This property was identified on the HAZNET, FINDS/Facility Registry Service (FRS), Emissions, California Environmental Reporting System (CERS) Hazardous Waste Sites (HAZ), RCRA Non-Generator (NonGen), and LA County CUPA databases, none of which are indicative of releases or impacts. The listings reflect the generation of asbestos-containing waste in 1997 and the generation of hazardous substances and petroleum products, including aqueous solutions, unspecified solvent mixture, waste oil and mixed oil, organic solids, and empty containers, from at least 2007 to 2014. Matrix currently operates on this north-adjoining property, and prior reconnaissance by other consultants have observed drums from this business stored in the north portion of the site.

Hydraulically Upgradient Properties: An automotive service station has operated on the property approximately 100 feet north of the Site (76 Station/Unocal/Union Oil, 1004 La Cienega Boulevard) since 1964, and a historical dry cleaner operated on the northwest-adjoining property (8500 West Olympic Boulevard) from at least 1984 to 2015. Subsurface investigations conducted on these properties have detected total petroleum hydrocarbons as gasoline (TPH-gasoline) and other fuel constituents and additives in groundwater samples and PCE in soil and soil vapor samples collected from these properties. Due to the historical service station and dry cleaning operations, known impacts to the subsurface, proximity and hydraulically upgradient direction in relation to the Site, and shallow depth of groundwater, these properties are likely to have adversely impacted soil, groundwater, and/or soil vapor beneath the Site. These constituents have been detected in soil, soil vapor, and groundwater at/beneath the Site (as stated in the above REC) and may be from these off-Site sources. Thus, these findings are considered a REC.

Controlled Recognized Environmental Conditions (CRECs)

No CRECs were identified during the Phase I ESA.

Historical Recognized Environmental Conditions (HRECs)

No HRECs were identified during the Phase I ESA.

De Minimis Conditions

Historical Agricultural Land Use: The Site was used for livestock grazing and farming from the mid-1800s to the 1920s, according to prior reports. Based on the timeframe, it is possible that hazardous pesticides or herbicides (considered hazardous substances) were used on Site;

06; HQ=1), California Maximum Contaminant Levels (CA MCLs), and San Francisco Bay (SFB)-RWQCB Tier 1 ESLs for a residential scenario. The conservative attenuation factor of 0.03 was applied to ambient air screening levels to convert to soil vapor screening levels.

however, no evidence of pesticide/herbicide usage was found as part of the Phase I ESA. Thus, this finding is considered to be a de minimis condition.

Solid Materials: Solid materials and waste (presumed to be non-hazardous) were observed throughout the Site during the June 2021 Site reconnaissance. General refuse and autobody debris were observed in the northern portion of the Site. Soil piles, crushed concrete, rubble, aggregate piles, and demolition debris were staged in the central portion of the Site. There was no indication of releases, ground surface staining, or other impacts from the solid waste/debris listed here. Thus, this finding to be a de minimis condition.

Business Environmental Risk (BER)

Engineering Controls for Possible Methane Mitigation and other Building Department Requirements: The Site is located within a City of Los Angeles Methane Zone. Methane could pose a risk to the structure and building inhabitants, as build-up inside of structures can result in adverse conditions, including potential low-oxygen or explosive conditions, separate from what would be classified as a BER.

According to a 2017 Phase I ESA report (EFI, 2017), the Site is planned to have a subterranean parking structure that will require dewatering and the proposed building will have a vapor barrier. An approval letter from the City of Los Angeles Department of Building and Safety (LADBS) had a list of requirements for the proposed redevelopment. These findings and features may require additional evaluations, inspections, mitigation, and maintenance, and are considered a BER.

On-Site Well Abandonment: Geosyntec observed seven groundwater monitoring wells on the Site during the reconnaissance. These wells are from prior subsurface investigations associated with the nearby service station nearby to the north and were observed to be in poor condition. If these wells are not anticipated to be used in the future, Geosyntec recommends proper abandonment per regulatory requirements.

Based on the conclusions of the Phase I ESA, Geosyntec Consultants prepared the Phase II Environmental Site Assessment (Phase II ESA) (refer to Appendix F). The objective of the Phase II ESA was to identify potential impacts on soil, soil vapor, and groundwater associated with the identified RECs at the Site.⁸² A total of twenty soil borings were advanced using a direct-push rig at the Site. A total of seven dual nested soil vapor probes were installed with a direct push rig at 5 and 10 feet bgs throughout the Site (for methane and soil vapor investigations). Groundwater sampling was performed from four of the seven onsite monitoring wells.

The Phase II ESA Geosyntec, April 28, 2022) concluded the following:

Known Impacts on the Site – Former Auto Repair Shop: The results of soil, soil vapor, and groundwater sampling in the vicinity of the former auto repair shop indicate concentrations of

⁸² The Phase I reviewed and summarized multiple prior reports and investigations, including investigations in 2012 and 2014 that identified residual VOCs in soil, soil vapor, and/or groundwater. The Phase II conducted new soil borings and testing. The difference in results is due to the current and historical data collected at the Site.

constituents of concern (COCs) are all below residential screening levels. Thus, the former auto repair shop is not considered a REC for the Site.

Undocumented Fill Material: Soil sampling conducted in undocumented fill materials throughout the Site indicates that concentrations of COCs exceeding residential screening levels are limited to the upper 1 to 2 feet bgs. While considered a REC for the Site, the limited impacts of undocumented fill can be effectively managed through soil management activities during the construction phase of the Project. (See **Mitigation Measure MM-HAZ-1**, below).

Hydraulically Upgradient Properties: An automotive service station has operated on the property approximately 100 feet north of the Site (76 Station/Unocal/Union Oil, 1004 La Cienega Boulevard), and a historical dry cleaner operated on the northwest-adjointing property (8500 West Olympic Boulevard):

- No dry-cleaning-related COCs were detected in soil, soil vapor, or groundwater samples collected at the Site. Thus, the upgradient historical dry cleaner is not considered a REC for the Site.
- Based on current and historical data collected at the Site, impacts to soil, soil vapor, and groundwater from the upgradient automotive service station appear to be limited to the northern margin and western margin of the Site. Impacted soil in this area of the Site will likely require segregation and offsite disposal as non-hazardous waste during the construction phase of the project. These findings are considered a REC. However, the limited soil impacts can be effectively managed with a soil management plan. (See **Mitigation Measure MM-HAZ-1**, below.)
- Based on the detected concentrations of TPH-gasoline and VOCs in groundwater at the Site, if dewatering is contemplated for the project a dewatering treatment system will need to be designed to manage hydrocarbons and VOCs to meet limits for discharge (i.e., surface water or sanitary sewer). (See **Mitigation Measure MM-HAZ-2**, below.)

Engineering Controls for Possible Methane Mitigation and other Building Department Requirements: The Site is located within a City of Los Angeles Methane Zone, and methane was detected on-Site at concentrations ranging from 0.68 parts per million volume (ppmv) to 4.7 ppmv. Positive pressures were not detected during the methane zone investigation. Based on the location of the Site within the Methane Zone, LADBS Methane Mitigation Site Design Level I will most likely be required for the Project. This is a regulatory requirement and not a CEQA mitigation measure.

On-Site Well Abandonment: Existing onsite monitoring wells and soil vapor probes should be properly destroyed prior to construction activities at the Site. Permits will need to be obtained from the Los Angeles Department of Public Health (LADPH) for the existing onsite wells MW-25, MW-25D, MW-25U, W-2, and W-5. This is a regulatory requirement and not a CEQA mitigation measure.

Conclusions

Based on the data collected during this investigation, the Site appears suitable for the proposed redevelopment. Soil exceeding residential screening levels would be disposed offsite at a facility permitted to accept the waste. The remaining onsite soils appear suitable for offsite reuse. Based on detections concentrations of lead and chromium and exceedances of residential screening levels for TPH in several shallow soil samples (0 to 5 ft bgs), a Soil Management Plan (SMP) should be prepared for the proposed construction activities. The SMP should describe the management of impacted soils that may be encountered during Site development, and outline health and safety procedures to minimize risk to onsite workers and personnel. In addition, the SMP should describe the procedures for export of inert soil for offsite reuse. It is anticipated that data collected during the Phase II investigation and additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse. All impacted soils will be properly removed and disposed of in accordance with SCAQMD Rule 1166 (Rule 1166). (See Mitigation Measure MM-HAZ-1, below.)

Based on the groundwater data, the groundwater at the Site is impacted with constituents associated with gas stations (TPH-gasoline, benzene, ethylbenzene). It appears the groundwater contamination is attributable to the ongoing remediation at the gas station hydraulically upgradient and north of the Site. Since building construction at the Site requires dewatering (groundwater was encountered “as shallow as 8 ft below the surface” Geotechnical Investigation, page 18), a dewatering contractor should be retained to design a treatment system to discharge to groundwater during construction. (See Mitigation Measure MM-HAZ-2, below.)

During subsurface excavation activities, including borings, trenching and grading, Occupational Safety and Health Administration (OSHA) worker safety measures would be implemented as required to preclude any exposure of workers to unsafe levels of soil gases, including, but not limited to, methane. Compliance with applicable laws and regulations and the mitigation measures listed below, Project impacts related to risk of upset would be less than significant.

Mitigation Measures

With implementation of the following mitigation measures, Project impacts related to risk of upset would be less than significant:

MM-HAZ-1 Soil Management Plan

A Soil Management Plan (SMP) shall be prepared for the proposed construction activities. The SMP shall describe the management of impacted soils which may be encountered during Site development, and outline health and safety procedures to minimize risk to onsite workers and personnel. In addition, the SMP shall describe the procedures for export of inert soil for offsite reuse. It is anticipated that data collected during the Phase II investigation and additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse.

The SMP will be developed by a qualified environmental consultant for the site and implemented during site grading and excavation. The SMP would be reviewed by appropriate oversight agencies as follows.

First, a draft version of a complete SMP prepared by a qualified environmental consultant would be submitted to the LAFD for review and comment. At the discretion of the LAFD, the draft SMP may also be provided to other expert agencies, including the Los Angeles County Fire Department Site Mitigation Unit of the Health Hazardous Materials Division (LACFD SMU), the Los Angeles Regional Water Quality Control Board (Water Board), and/or the Department of Toxic Substances Control (DTSC), should the LAFD determine such review is appropriate.

Should the LAFD determine it is necessary, it would provide comments on the draft SMP to the applicant. Additional comments may be provided by the LACFD SMU, the Water Board, or the DTSC, upon the request of the LAFD and the determination by any such agencies that comments are warranted. All such comments, to the extent the agencies determine comments are warranted, would be incorporated into the final draft SMP. The SMP would then be implemented during the soil disturbance and site grading phases of Project construction.

The objective of the SMP is to establish policy and requirements for the management and disposal of soils generated during excavation and redevelopment, and other activities that may disturb potentially contaminated soil. The SMP will address the following elements:

- Specify soil-handling controls required for complying with local, state and federal overseeing agencies.
- Prevent unacceptable exposure to contaminated soil.
- Prevent the improper disposal of contaminated soils.
- Specify the process for identifying, segregating, profiling and disposing of any stained/strong odor soil.
- Specify the soil monitoring requirements during removal of previously identified subsurface structures to visually observe the subsurface conditions following removal and to collect soil samples from the excavation depth and sidewalls as necessary to evaluate the soil for the presence of any contaminants of concern (COCs).
- Specify soil monitoring requirements in the event that stained or odorous soils are encountered if any other areas during excavation activities.
- Specify procedures if any unknown subsurface structures such as USTs, clarifiers, vaults, conduits, or piping are encountered. This may include stopping work, notifying the Environmental Consultant, sampling and analyzing for potential hazardous chemicals, providing recommendations for proper disposal.
- In the event that odorous or discolored soils are identified in accordance with the standards set forth in Rule 1166, Rule 1166 may require the presence onsite during construction activities of a qualified soil monitor to continuously monitor air emissions

and record measurements at 15-minute intervals using a direct reading organic vapor analyzer (OVA).

- If it is determined that soil exceeding contamination levels for TPH is identified, in accordance with Rule 1166, the following steps will be taken per the SMP:
 - All monitoring would be conducted at a distance no more than 3 inches above the soil surface using an OVA.
 - Monitoring would be initially conducted at a minimum frequency of one reading every 15 minutes.
 - Upon detection of TPH exceeding contamination levels, monitoring would be conducted at a minimum rate of one reading for every five cubic yards excavated.
 - Upon detection of TPH exceeding contamination levels, or stained and odorous soils, excavation activities would stop in the vicinity. Representative soil sample(s) would be obtained for analysis.
 - The SCAQMD would be notified with 24 hours of the first detection of TPH exceeding contamination levels.
 - Soil samples would be collected for characterization and disposal determination.
 - All contaminated soil would be segregated and removed from the site to an approved treatment/disposal facility.

At the conclusion of the proposed excavation activities and upon reaching the proposed redevelopment excavation depth, final confirmation soil samples will be collected to confirm the field readings.

- In the event that soil TPH exceeding contamination levels is still present at the proposed excavation depth, additional excavation activities would continue per the SMP (and in accordance with Rule 1166). The additional excavation activities would continue until TPH is below contamination levels. At that time, final confirmation soil samples will again be collected to confirm the field readings.

MM-HAZ-2 Dewatering Treatment System

Since building construction at the Site requires dewatering, a dewatering contractor shall be retained to design a treatment system to discharge to groundwater during construction pursuant to applicable Los Angeles Regional Water Quality Control Board requirements.

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

Less Than Significant Impact. The following schools are within one-quarter mile of the Project Site:

- Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard, 90 feet west of the Site.
- St. Mary Magdalen Catholic School, located at 1223 Corning Street, 1,320 feet southwest of the Site.

However, as discussed above, the Project would use minor amounts of paints, cleaning supplies, and small amounts of petroleum products consistent with other mixed-use residential and commercial properties, and in accordance with all applicable federal, state, and local regulations. Thus, 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. Therefore, Project impacts related to this issue would 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 Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The CEQA thresholds recognize that 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 a project. Specifically, the decision held that an impact from the existing environment to a project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of a project.

Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

Less Than Significant with Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

In meeting the provisions in Government 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, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on the Project Site.⁸³

⁸³ California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>.

According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST (Underground Storage Tanks) facilities, monitoring wells, or California Department of Toxic Substance Control (DTSC) cleanup sites or hazardous materials permits on the Project Site.⁸⁴

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.⁸⁵

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.⁸⁶

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.⁸⁷

The Phase I identified the Site in several other database listings:

- Iran Omrani at 1032 La Cienega Boulevard: This entity was identified on the California Department of Toxic Substances Control (DTSC) Hazardous Waste Manifest (HAZNET) database in 1991; no information was provided.
- Elie Freim at 1032 La Cienega Boulevard: This entity was identified on the HAZNET database for generating an unspecified solvent mixture (blended on-Site) and tank bottom waste (discharged to the sewer under a National Pollutant Discharge Elimination System [NPDES] permit) in 2007.
- Auto Repair (or some derivation) at 1032 La Cienega Boulevard: This entity was identified on the HAZNET, City of Los Angeles Hazardous Materials Facilities (LA City HAZMAT), and Los Angeles County Certified Unified Program Agency (LA County CUPA) databases. This entity generated contaminated soil from Site cleanup, an unspecified solvent mixture, and organic solids from 1991 to 2003, and had an inactive hazardous materials inventory with the City of Los Angeles in 2019.
- Nasa Environmental Inc. at 1032 La Cienega Boulevard: This entity was identified on the HAZNET database in 2007; no information was provided.
- DIDM Development Corp at 1022-1034 La Cienega Boulevard: This entity was identified on the HAZNET database for generating asbestos-containing waste in 2006.

Implementation of Mitigation Measures MM-HAZ-1 and MM-HAZ-2 would reduce impacts from contaminated soil and potentially contaminated groundwater since dewatering is necessary, to less than significance.

⁸⁴ California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>.

⁸⁵ California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>

⁸⁶ 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/>.

⁸⁷ California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>

Thus, the Project would not create a significant hazard to the public or the environment as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport. The closest airports to the Project Site are the Santa Monica Airport, located 4.75 miles southwest of the Site, and Los Angeles International Airport (LAX), located 7.5 miles southwest of the Project Site. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Site. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. Vehicular access to the Project Site would be provided from La Cienega Boulevard. During construction, the Project would include a Construction Traffic Management Plan (PDF-TRANS-1), provided under Checklist Topic XVII [Transportation]), which would be reviewed and approved by the City prior to construction, and which would ensure the Project does not interfere with emergency response to the Project Site.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of the Los Angeles Fire Department's (LAFD) fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit.

The Project also would not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public ROW (e.g., sidewalks and roadways) adjacent to the Project Site. The adjacent curb lane on La Cienega Boulevard, which serves as a parking lane during off-peak hours, may be temporarily closed throughout the construction period. Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan and emergency access would not be impeded.⁸⁸ Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets.

Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and

⁸⁸ Transportation Assessment, Gibson Transportation Consulting, June 2022.

surrounding area would be maintained both during and post-construction. Therefore, Project impacts with respect to emergency response and evacuation plans would be less than significant.

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

No Impact. The Project Site is located in a highly urbanized area of the City that is not subject to wildland fires, and is not located in a Very High Fire Hazard Severity Zone.⁸⁹ Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Implementation of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires, and no impacts would occur as a result of the Project.

Cumulative Impacts

The geographic extent of the Project's potential hazards and hazardous materials impacts is limited to the Project Site and the Project would not contribute to any other potential hazards and hazardous materials impact that may occur beyond the boundaries of the Project Site. All related projects consist of residential and commercial projects that would not generate or utilize significant amounts of hazardous materials, and would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

⁸⁹ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, accessed April 12, 2022.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The information and analyses presented below are primarily based on the following (refer to Appendix G):

G Hydrology and Water Resources Technical Report, KPFF, August 2022.

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

Less Than Significant Impact. During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if the Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, but the Project's operations would be required to comply with the City's Low Impact Development (LID) Ordinance, which applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment protocols.

Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site during Project operations as compared with the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality, and Project impacts related to water quality would be less than significant.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is vacant. During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a significant source of groundwater recharge. Following redevelopment of the Project Site with a new mixed-use building, groundwater recharge would remain negligible, similar to existing conditions.

Based on the Geotechnical Engineering Investigation conducted for the Project Site (refer to Appendix D-1), perched groundwater was observed during drilling in the current investigation at a depth of 8 feet below ground surface. However, previous investigations by Geotechnologies and AGI Geotechnical observed groundwater at depths ranging from 15 to 18 feet below the existing ground surface. In addition, GeoPentech observed groundwater at 20 feet bgs on August 27, 2021 in an existing unmarked monitoring well approximately 20 to 30 feet northwest of GP-2. Based on a review of the Seismic Hazard Zone Report for the Hollywood Quadrangle, the historic high groundwater level beneath the site is estimated to be about 15 feet below the ground surface. It should be recognized that groundwater levels can fluctuate over time, depending on seasonal rainfall and other influences (i.e., irrigation). Furthermore, there may be a potential for perched water to occur locally in sandy zones of the alluvial deposits above the static groundwater level. In addition, recent changes in policies for the use of stormwater infiltration could result in changing seepage conditions at shallow depths across the region.⁹⁰

The basement grade of the proposed building would be established close to the historically high groundwater level. In compliance with all applicable City building and excavation requirements, and as specified in a final design-level geotechnical report to be reviewed and approved by LADBS, the basement slabs would be properly waterproofed.

If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table and impacts related to groundwater hydrology would be less than significant.⁹¹

While no dewatering is anticipated to be required either during construction or operation, should dewatering be subsequently deemed necessary, all such dewatering would be performed in pursuant to applicable Los Angeles Regional Water Quality Control Board requirements (see Mitigation Measure MM-HAZ-2).

Additionally, all water consumption associated with the Project would be supplied by LADWP and not from groundwater beneath the Project Site. Therefore, impacts related to groundwater as a result of the Project would be less than significant.

⁹⁰ Geotechnical Investigation, GeoPentech, March 30, 2022, page 10.

⁹¹ Hydrology and Water Resources Technical Report, KPFF, August 2022.

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

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

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

The Project Site is located in a highly urbanized area of the City and is currently vacant but has been developed with impervious surfaces (e.g., buildings, parking areas, walkways, etc.). There are no natural watercourses on or near the Project Site. During the Project's construction phase, soil would be exposed. However, the Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities.

In addition, the Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater.

In the existing condition, stormwater runoff primarily sheet flows over the sidewalks and into the gutter. The post-Project condition will manage stormwater flow locally into area drains and roof drains, which will collect and likely discharge through the curb face at concentrated points or into a storm drain pipe connected to the street main. Therefore, it is highly unlikely the project would cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. A comparison of the pre and post peak flow rates indicates an overall increase of 0.06 cubic feet per second (cfs). However, this represents an increase of approximately 1.3%. As the anticipated Project represents primarily a minor redistribution of stormwater discharge – and one which will be further controlled with the installation of LID BMPs. The LID requirements for the Project Site would outline the stormwater treatment postconstruction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event. The Project BMPs will mitigate the stormwater runoff quality and quantity. Therefore, impacts related to stormwater infrastructure improvements would be less than significant.

Thus, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Therefore, Project impacts related to erosion or siltation would 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 could occur if the Project resulted in increased surface water runoff volumes during construction, or if operation of the Project would result in flooding conditions affecting the Project Site or nearby properties.

Under the post-Project conditions, most of the Project Site would also be developed with impervious surfaces, and all stormwater would be directed toward BMP features and/or the local storm drain system. The Project would not increase the rate or amount of surface runoff from the site.

The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, etc., throughout the Project Site. The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Thus, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, Project impacts related to flooding would be less than significant.

**iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
or**

Less Than Significant Impact. Regarding storm drain capacity, refer to response to Checklist Question X(c)(ii) (Hydrology and Water Quality – on- or off-site flooding. Regarding water quality, refer to response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality).

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. The Project Site is not within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1595G) or by the City.⁹² Thus, the Project would not have the potential to impede or redirect flood flows, and no impact related to this issue would occur.

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

No Impact. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank.

⁹² FEMA, Flood Insurance Rate Map: <https://msc.fema.gov/portal/home>, accessed April 12, 2022.

The Project Site is not within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1595G) or by the City.⁹³ Also, the Project is not located near any large bodies of water. The Project Site is located approximately nine miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

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

No Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other runoff from the site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water hydrology is the Ballona Creek Watershed. The Project in conjunction with forecasted growth in the Ballona Creek Watershed could cumulatively increase stormwater runoff flows. However, as noted above, the Project itself is not anticipated to have a significant net impact on stormwater flows. Also, in accordance with City requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. The City of Los Angeles Department of Public Works reviews projects on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Implementation of LID BMPs would, at a minimum, maintain existing runoff conditions. Therefore, potential cumulative impacts associated with the Project on surface water hydrology would be less than significant.

Surface Water Quality

Future growth in the Ballona Creek Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. The Project Site is located in a highly urbanized area, and it is anticipated that future development projects in this highly urbanized area are not likely to cause substantial changes in regional water quality. As noted above, the Project does not have an adverse impact on water quality and would in fact improve the quality of on-site flows due to the introduction of LID BMPs which do not currently exist at the Project Site. It is likewise anticipated that related projects

⁹³ FEMA, Flood Insurance Rate Map: <https://msc.fema.gov/portal/home>, accessed April 12, 2022.

would also be subject to LID requirements and implementation of measures to comply with TMDLs. The Project, combined with related projects, would comply with all applicable laws, rules and regulations, so cumulative impacts to surface water quality would be less than significant.

Groundwater Hydrology

The geographic context for the cumulative impact analysis on groundwater level is the Central Subbasin. The Project, in conjunction with forecasted growth in the region, could cumulatively increase groundwater demand. However, as noted above, no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site and the Project would not have an adverse impact on groundwater levels. Furthermore, as previously discussed, although implementation of the Project would result in an increase in the amount of impervious surface area, such implementation would include the evaluation of and, if feasible, implementation of infiltration LID BMPs. As such, the project is not anticipated to have a negative impact on groundwater recharge. While any calculation of the extent to which related projects would increase or decrease surface imperviousness that might affect groundwater hydrology would be speculative, the development of such projects would be subject to review and approval pursuant to all applicable regulatory requirements, including any required mitigation of potential groundwater hydrology impacts. In addition, the Project and related projects are located in a highly urbanized area so any potential reduction or increase in groundwater would be minimal in the context of the regional groundwater basin. Therefore, cumulative impacts to groundwater hydrology would be less than significant.

Groundwater Quality

Future growth in the Central Subbasin would be subject to LARWQCB requirements relating to groundwater quality. In addition, since the Project Site is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality. As noted above, the Project does not have an adverse impact on groundwater quality. Also, it is anticipated that, like the Project, other future development projects would also be subject to LARWQCB requirements and implementation of measures to comply with TMDLs in addition to requirements of California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project would comply with all applicable laws, rules, and regulations, therefore cumulative impacts to groundwater quality would be less than significant.

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is located in a highly urbanized area of the City. Additionally, the Project Site is entirely surrounded by existing development and roadways. Regarding the surrounding land uses, the Project would provide a mix of residential and commercial uses that would be consistent with other land uses in the surrounding area and compatible with the surrounding community. As such, the Project would be compatible with and complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, no impact would occur.

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

Less Than Significant Impact. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.⁹⁴

More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and

⁹⁴ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.

programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project’s consistency with the requirements and policies of SCAG’s RTP/SCS, the City’s General Plan (including the Framework Element), the Wilshire Community Plan, and the LAMC, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project’s consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant, as expanded below.

Regional

Southern California Association of Governments

SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS’ periodically. On September 3, 2020, SCAG’s Regional Council formally adopted the 2020-2045 RTP/SCS (also known as Connect SoCal).

The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than \$638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by

encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2020-2045 RTP/SCS is included in **Section 3** (SCEA Criteria and Transit Priority Project Consistency Analysis), as well as in **Section 5.VIII** (Greenhouse Gas Emissions). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS, including the general use designation, density, and building intensity identified in the 2020-2045 RTP/SCS for the area in which the Project Site is located. Therefore, the Project is consistent with the 2020-2045 RTP/SCS.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element (including chapters pertaining to Land Use and Urban Form and Neighborhood Design), a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 citywide elements.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address land use and serves as a guide for updating the community plans and the citywide elements. The Framework Element provides a base relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, while the community plans determine the specific land use designations of individual parcels.

Project Consistency Discussion

The Project's consistency with the applicable policies of the General Plan Framework Element is provided in Table XI-1. As discussed there, the Project is substantially consistent with the Framework Element.

Table XI-1

Project Consistency with Applicable Policies of the Framework Element

Policy	Project Consistency Assessment
Framework Element: Land Use Chapter	
<p>Policy 3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural / institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.</p>	<p>Consistent. The Project takes advantage of the existing zoning (Commercial) and land use designation (General Commercial) for the Project Site in addition to the City's Transit Oriented Communities ("TOC") affordable housing incentive program to develop an infill site with a mixed-use building that includes 290 dwelling units (inclusive of 29 units set aside for Extremely Low Income households) and 7,500 square feet of neighborhood-serving commercial restaurant use. The Project Site is located within an HQTAs as defined by SCAG and within a TPA as defined by SB 743. The Site is located in close proximity to transit and sources of employment, housing, shopping, and entertainment. The Project would provide housing and jobs for existing and future residents.</p>
<p>Policy 3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.</p>	<p>Consistent. The Project takes advantage of the existing zoning (Commercial) and land use designation (General Commercial) for the Project Site in addition to the City's TOC affordable housing incentive program to develop an infill site with a mixed-use building that includes 290 dwelling units (inclusive of 29 units set aside for Extremely Low Income households) and 7,500 square feet of neighborhood-serving commercial use. The Project Site is located within an HQTAs as defined by SCAG and within a TPA as defined by SB 743. The Site is located in close proximity to transit and sources of employment, housing, shopping, and entertainment. The Project would add housing and commercial uses to the neighborhood.</p>
<p>Policy 3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The Project would include pedestrian-scale uses at the ground floor, including a resident lobby and neighborhood-serving commercial, that would connect to the pedestrian infrastructure adjacent to and near the Project Site. Additionally, the Project would include 184 bicycle parking spaces.</p>
<p>Policy 3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in</p>	<p>Consistent. The Project Site is located in a highly urbanized area of the City, along a primary transit corridor. The surrounding uses along the arterial streets such as Wilshire Boulevard, La Cienega Boulevard are improved with medium- to high-density retail, commercial, and residential uses.</p> <p>The Project would not displace any existing single-family residential neighborhoods. The Project provides multi-family housing and ground floor commercial uses on an infill site that allows for such uses based on the existing zoning. Specifically, the Project would develop 290 multi-</p>

Table XI-1

Project Consistency with Applicable Policies of the Framework Element

Policy	Project Consistency Assessment
<p>accordance with the Framework Long-Range Land Use Diagram.</p>	<p>family units and approximately 7,500 square feet of commercial restaurant land uses within an HQTA and within a TPA area. Finally, the Project would be located near robust transit opportunities, including multiple bus lines and the future Metro Purple Line (D Line).</p>
<p>Policy 3.4.3 Establish incentives for the attraction of growth and development in the districts, centers, and mixed-use boulevards targeted for growth that may include:</p> <ul style="list-style-type: none"> a. Densities greater than surrounding areas, b. Prioritization of capital investment strategies for infrastructure, services, and amenities to support development, c. Economic incentives (e.g., redevelopment, Enterprise Zones, Neighborhood Recovery, and other), d. Streamlined development review processes, e. “By-right” entitlements for development projects consistent with the community plans and zoning, f. Modified parking requirements in areas in proximity to transit or other standards that reduce the cost of development, and g. Pro-active solicitation of development. 	<p>Consistent. TOC affordable housing incentive program to develop an infill site with a mixed-use building that includes 290 dwelling units (inclusive of 29 units set aside for Extremely Low Income households) and 7,500 square feet of neighborhood-serving commercial restaurant use.</p>
<p>Policy 3.13.6 Design multi-family residential units to minimize the impacts of traffic and noise and incorporate recreational and open space amenities to support the needs of the residents.</p>	<p>Consistent. The Project includes 290 multi-family residential units and 54,540 square feet of open space. As discussed under Checklist Topic VIII (Noise) and XI (Transportation), the Project would not result in any significant operational impacts. The Project also includes an approximately 4,500 square-foot publicly accessible pocket park on the northern portion of the Project Site.</p>
<p>Housing Chapter</p>	
<p>Objective 4.2 Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</p>	<p>Consistent. The multi-family residential Project would include up to 290 dwelling units, including 29 dwelling units reserved for Extremely Low-Income Households, in an area well-served by existing transit, including a Major Transit Stop within a half-mile of the Project Site. The Project would be permitted to utilize the TOC to permit additional residential density and FAR increases allowed through the TOC Affordable Housing Incentive Program for the Project’s consistency with the TOC Guidelines as a Tier 3 project and its provision of affordable housing for Extremely Low-Income Households. The Project uses would be similar to other developments along S. La Cienega Boulevard, an arterial roadway well-served by transit. The Project would not materially impact the</p>

Table XI-1

Project Consistency with Applicable Policies of the Framework Element

Policy	Project Consistency Assessment
	<p>character of the existing residential uses in the area of the Project Site, including the HPOZ to the east, nor does the Project remove existing housing or result in displacement of existing residents.</p>
<p>Objective 4.3: Conserve scale and character of residential neighborhoods.</p>	<p>Consistent. The Project would develop the Project Site with a new, contemporary 28-story mixed-use building on parcels that are currently vacant. Although the proposed building is taller than the general heights of buildings found in the immediate neighborhood, the tower element, which starts at the fourth level, occupies a small footprint of the Site and is located near the La Cienega Boulevard frontage and away from a preponderance of the residential uses to the east that abut the Project Site. The base of the building is three stories, and the podium deck atop the base includes open space programmed with abundant landscaping, trees and resident amenities. As a result, the building's tower approach creates greater architectural interest and variety rather than employing a block style lower uniform height building across the entire footprint of the Site which would be more imposing and impactful to a majority of the residential uses immediately to the east of the Site.</p> <p>In addition, the Project's design would actively engage La Cienega Boulevard and maintain a human scale by incorporating a two-story volume residential lobby and 7,500-square-foot restaurant space, which would be accessed by pedestrians from the sidewalk. At the northern end of the Site, the Project includes an approximately 4,500 square-foot publicly accessible open space plaza with a pedestrian walkway and seating area, landscaping, and hardscape elements. The Project would include improvements on the ground level to enhance the pedestrian realm including new street trees, short-term bicycle racks, upgraded sidewalk, and landscaping. The Project would not conflict with applicable zoning and other regulations governing scenic quality.</p>
<p>Urban Form and Neighborhood Design Chapter</p>	
<p>Goal 5A A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.</p>	<p>Consistent. The Project would support this City goal by providing a new mixed-use residential development on a vacant lot along a SCAG identified Livable Corridor that would further activate the existing Project Site and serve the existing and future residents of the surrounding community. The proposed new development would be consistent and compatible with the existing adjacent residential, institutional, and commercial uses in the</p>

**Table XI-1
Project Consistency with Applicable Policies of the Framework Element**

Policy	Project Consistency Assessment
	vicinity of the Project Site. In addition, the housing and employment opportunities created by the Project would encourage future investment in the Wilshire Community Plan area.
<p>Objective 5.2 Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.</p>	<p>Consistent. The Project is located along S. La Cienega Boulevard, which is well-served by existing transit service, including a Major Transit Stop within a half-mile of the Project Site. La Cienega Boulevard is developed with a diversity of land uses, including commercial uses, that connects and serve the surrounding neighborhoods.</p> <p>The Project would be developed on a site that is located within an HQTAs and a TPA and that is well-served by existing and future transit infrastructure.</p>
<p>Policy 5.2.2 Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.</p> <p>[...]</p> <p>d. Buildings located at activity nodes along mixed-use boulevards generally shall have the same characteristics as either neighborhood districts or community centers, depending on permitted land use intensities. Housing over ground floor storefronts or in place of commercial development shall be encouraged along mixed-use boulevards.</p>	<p>Consistent. The Project proposes a 28-story mixed-use residential building that achieves a 3.75:1 FAR and is within an area well-served by existing transit routes, including a Major Transit Stop within a half-mile of the site. The Project would be permitted residential density and FAR increases allowed through the TOC for the Project’s consistency with the TOC Guidelines as a Tier 3 project and its provision of affordable housing for Extremely Low-Income Households. The Project uses would be similar to other multi-family residential buildings along an arterial roadway such as S. La Cienega Boulevard. Given the nature of the Project and location of the Project Site, the Project supports transit use in the daytime and nighttime. The Project would not materially impact the character of the existing residential uses in the area of the Project Site, including the HPOZ to the east, nor does the Project remove existing housing or result in displacement of existing residents.</p>
<p>Objective 5.5 Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.</p>	<p>Consistent: The Project would redevelop a vacant site with a new, high-quality architectural design for a mixed-use development that is constructed to the latest resource-efficient requirements of the City’s Green Building Code, as well as provisions for on-site bicycle parking and proximity to a Major Transit Stop to reduce car dependency, thereby improving the quality of life and aesthetic quality of the public realm.</p>
<p>Objective 5.8 Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within</p>	<p>Consistent. The Project would add a mix of uses on the Project Site, including new multi-family residential units and new commercial restaurant space, in close proximity to transit opportunities as well as existing commercial</p>

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Policy	Project Consistency Assessment
regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	and cultural uses, thereby encouraging pedestrian travel and activity along La Cienega Boulevard and on surrounding streets.
Objective 5.9 Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would be required to implement principles of the City's <i>Crime Prevention through Environmental Design Guidelines</i> subject to the approval of the City of Los Angeles Police Department prior to issuance of building permits. Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. Additionally, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project's residents would be able to monitor suspicious activity at the building entry points.
Source: City of Los Angeles General Plan.	

General Plan Housing Element

Adopted in November 2021, the Housing Element 2021–2029 of the City's General Plan identifies five primary goals that will guide the Element:⁹⁵

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable portions that meet existing and projected needs.
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.
- Goals 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.
- Goal 5: A City that is committed to preventing and ending homelessness.

⁹⁵ Los Angeles, Housing Element 2021-2029, adopted November 2021: <https://planning.lacity.org/plans-policies/housing-element-update#adopted-plan>

The Regional Housing Needs Assessment (RHNA) is the State required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. For this current 2021-2029 Housing Element 6th cycle, the regional Southern California Association of Governments (SCAG) issued a target of 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40%) are designated for very low-and low-income households.

On February 22, 2022, the California Department of Housing and Community Development (HCD) rejected the 2021 Housing Element⁹⁶, telling the City that it must re-zone more quickly to comply with stricter state laws that are aimed at more development across California. Under the state's ruling, the city must rezone for 255,000 new homes by mid-October, instead of over the next three years.

Los Angeles City Planning and the Los Angeles Housing Department worked together to address feedback received from HCD and prepare revisions (targeted amendments) to programs to address the new Affirmatively Furthering Fair Housing (AFFH) requirements.

On Tuesday, June 14, 2022, the Los Angeles City Council adopted the targeted amendments to the 2021-2029 Housing Element (Council File No. 21-1230-S1).

The amended Housing Element was provided to HCD immediately after its adoption for review and certification.⁹⁷

On June 29, 2022, HCD confirmed that the amended Housing Element is in full compliance with State Housing Element Law.⁹⁸

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan area of the City. The Wilshire Community Plan is one of 35 Community Plans that make up the Land Use Element of the City's General Plan. Under the Community Plan, the Project Site has a General Plan land use designation of Community Commercial. The Community Plan area is often spoken of as the Mid-City section of Los Angeles. The plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard, and Pico Boulevard to the south; Hoover Street to the east; and the cities of West Hollywood and Beverly Hills to the west.

The Community Plan is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits; land development and other trends; and protect investment to the extent reasonable and feasible.

⁹⁶ California Department of Housing and Community Development, https://planning.lacity.org/odocument/f058cf1b-ce3a-4e10-ad07-9972e24585e2/HCD_comment_Letter.pdf

⁹⁷ Los Angeles, Housing Element 2021-2029, news: <https://planning.lacity.org/plans-policies/community-plan-update/housing-element-news/city-council-adopts-targeted-amendments>

⁹⁸ California Department of Housing and Community Development: <https://planning.lacity.org/odocument/c30f832f-9f91-47ff-bcc0-69f33b197a11/LACityAdoptedIN062922.pdf>

Project Consistency Discussion

A discussion of the Project’s consistency with the residential and commercial objectives and policies of the Wilshire Community Plan is provided in Table XI-2. As shown therein, the Project would be substantially consistent with the Wilshire Community Plan.

**Table XI-2
Project Consistency with the Community Plan**

Objectives and Policies	Project Consistency Assessment
Residential	
<p>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.</p> <p>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.</p> <p>Policy 1-1.3 Provide for adequate Multiple Family residential development.</p> <p>Policy 1-1.4 Provide for housing along mixed-use boulevards where appropriate.</p>	<p>Consistent. The Project includes development of an infill site on La Cienega Boulevard with a mix of uses including 290 residential units and 7,500 square feet of commercial restaurant uses.</p> <p>Visible throughout the Carthay Neighborhoods Historic District, seven tall towers (over 10-stories) are most visible near the intersection of Schumacher Drive and along Warner Drive. Despite these seven tall towers, Carthay Circle was adopted as an HPOZ in 1998. While distinct in size, mass, scale and proportion, the towers do not detract from the setting of either the Carthay Circle HPOZ or the Carthay Neighborhoods Historic District such that they were not eligible for designation. Rather, Carthay Circle HPOZ and the Carthay Neighborhoods Historic District have such a distinct setting and feeling that the tall towers on Wilshire Boulevard, adjacent to the historic district and Carthay Circle HPOZ, add to the sense of the neighborhood as a cohesive enclave, distinct from its surroundings. In the same way, the Project may also add to the distinct and special feeling of South Carthay HPOZ.</p> <p>Although the Project will introduce a new building visible throughout both South Carthay HPOZ and the Carthay Neighborhoods Historic District, the setting of the historic districts would be retained.</p>
<p>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.</p> <p>Policy 1-2.1 Encourage higher density residential uses near major public transportation centers.</p>	<p>Consistent. The Project would include up to 290 dwelling units along La Cienega Boulevard, which is well-served by existing transit service. The Project Site is located within a TPA due to its location within one-half mile of a major transit stop. The Project Site is also approximately 0.5 miles south of the future Metro D Line Extension. Further, existing commercial uses are concentrated along S. La Cienega Boulevard and within the vicinity that would be within reasonable walking, biking, and transit distance for future residents of the Project.</p>

**Table XI-2
Project Consistency with the Community Plan**

Objectives and Policies	Project Consistency Assessment
<p>Objective 1-3 Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</p> <p>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.</p> <p>Policy 1-3.2 Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.</p> <p>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.</p>	<p>Consistent. The Project would preserve and enhance the varied and distinct character and integrity of the surrounding neighborhood.</p> <p>The Project is designed with a curved vertical tower element at the north part of the Site to anchor the building. At the south end of the Project, the building would be a podium deck with parking and amenities. The Project would also incorporate an entry courtyard and the new building, and would also provide new landscaping and street trees.</p> <p>The Project is not located in a Historic Preservation Overlay Zone (HPOZ) and as discussed under Checklist Topic V (Cultural Resources), would not result in a significant impact either directly or indirectly on the off-site South Carthay historic district located east of the Project Site.</p> <p>As discussed under Checklist Topic XVII (Transportation), Project impacts related to transportation would be less than significant. Moreover, the Project is located on La Cienega Boulevard, and would only be accessed from this roadway, thus not creating spillover onto residential streets in the vicinity.</p>
<p>Objective 1-4 Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped, and senior citizens.</p> <p>Policy 1.4-1 Promote greater individual choice in type, quality, price and location of housing.</p> <p>Policy 1.4-2 Ensure that new housing opportunities minimize displacement of residents.</p> <p>Policy 1-4.3 Encourage multiple family residential and mixed-use development in commercial zones.</p>	<p>Consistent. The Project Site is currently zoned C2 (Commercial). The Project includes development of the site with 290 residential units, including 29 units set aside for Extremely Low Income households. The proposed unit mix includes 36 studio units, 158 1-bedroom units, and 96 2-bedroom units. No existing residents would be displaced by the Project.</p>
Commercial	
<p>Objective 2-1 Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.</p>	<p>Consistent. The Project meets the commercial policies and objectives contained in the Community Plan by providing approximately 7,500 square feet of new commercial restaurant uses.</p>

**Table XI-2
Project Consistency with the Community Plan**

Objectives and Policies	Project Consistency Assessment
<p>Policy 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.</p> <p>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.</p> <p>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.</p> <p>Objective 2-2 Promote distinctive commercial districts and pedestrian-oriented areas.</p> <p>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.</p>	<p>These commercial uses would support the needs of local residents, drawing pedestrians to the Project Site and generating additional foot traffic on the Project Site and in the immediate vicinity. The new entry courtyard and new landscaped parkways and street trees that would be planted along La Cienega Boulevard would enliven the street, enhance the pedestrian experience, and create a pedestrian buffer from automobiles along these roadways.</p>
<p>Source: Wilshire Community Plan.</p>	

City of Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Zoning Code establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a brief discussion of the Project’s consistency with the Zoning Code, including the provisions of the City’s TOC affordable housing incentive program, (LAMC Section 12.22 A. 31) is provided below for informational purposes.

Use

The Project is located within the C2-1 zone, which allows for multi-family residential, commercial and parking uses.

Density

The permitted residential density in the C2 zone is one dwelling unit per 400 square feet of lot area. The Project Site has a total lot area of 79,623 square feet, which would permit the development of 200 units when utilizing the TOC Guidelines, fractional numbers round up when calculating base density and overall permitted density. Accordingly, the Project Site has a base density of 200 units, and with the

provision of a minimum of 1 percent of the total number of units affordable for Extremely Low Income households, the Project qualifies for a TOC Guidelines Tier 3 base incentive to increase density by 70 percent, resulting in a maximum permitted density of 340 dwelling units. The Project complies with this density limit.

Floor Area Ratio and Height

The permitted FAR in the C2-1 zone is 1.5 to 1 with no height limitation. The Project Site is also not within the distances specified in LAMC Section 12.21.1.A.10 to properties zoned RW or more restrictive so the transitional height provisions of that LAMC section would not apply to the Project.

Pursuant to a TOC Guidelines Tier 3 base incentive, the Project qualifies for an increase in FAR of 3.75 to 1 in lieu of 1.5 to 1.

Yard Setbacks

In the C2 zone, no front yards are required, and the side and rear yards requirements of the R4 zone (which require a five-foot side yard plus one foot for each story over two and a 15-foot rear yard plus one foot for each story over three) apply at the first level of a building containing residential units. Pursuant to LAMC Section 12.22.A.18(c)(3), no yard requirements shall apply to the residential portions of buildings located on lots in the CR, C1, C1.5, C2, C4, and C5 Zones used for combined commercial and residential uses, if such portions are used exclusively for residential uses, and abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings.

The C2 zone requires no front yard (La Cienega), 16 foot side yards (north and south sides), and a 20-foot rear yards. For a commercial zone, the TOC permits reduced side and rear yards based on the RAS3 zone. In the RAS3 zone, side yards are not required for the ground floor portion of buildings when the ground floor is used exclusively for commercial purposes. For all portions of buildings used for residential purposes, a minimum 5-foot side yard may be required. With respect to the rear yard, the RAS3 zone permits a 15-foot rear yard. The Project requests an Additional Incentive to provide a 5-foot side yard on the south side of the Site and a 15-foot rear yard.

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City assesses the consistency of the related projects that are located in the City of Los Angeles with all applicable plans, policies, and regulations associated with those projects, on a project-by-project basis. Regardless of any potential inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area of the City and is currently developed with multi-family residential and commercial uses. In addition, no oil extraction or drilling or mining of mineral resources currently exists at the Project Site. While the Project Site is zoned C2-1-O, with the “-O” suffix indicating its location within a designated oil drilling district, no past or present oil drilling activities have occurred on the Site. The Site is within the Beverly Hills Oil and Gas Field.⁹⁹ The closest mapped oil well is approximately 375 feet south of the Site.¹⁰⁰ Further, the Site is an infill location, surrounded by other urban uses, including sensitive residential uses to the east. Thus, the Site is not a good candidate for mineral resource removal. Moreover, there are no known aggregate and mineral sources or locally important mineral resource recovery sites on or adjacent to the Project Site and the Project Site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.¹⁰¹ Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact related to mineral resources would occur.

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

No Impact. The Project Site is located in an urbanized area of the City and is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element or any other

⁹⁹ NavigateLA, Water, Oil and Gas Fields layer: <http://navigatea.lacity.org/navigatea/>, April 11, 2022.

¹⁰⁰ California Department of Conservation Wellfinder map: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.28793/34.06256/17>, accessed April 12, 2022.

¹⁰¹ City of Los Angeles General Plan Conservation Element, Exhibit A (Mineral Resources), adopted September 2001.

applicable land use plan.¹⁰² Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impact related to this issue would occur.

Cumulative Impacts

As discussed above, the Project would not result in any impacts related to mineral resources. Regardless of the degree to which the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

¹⁰² City of Los Angeles General Plan Conservation Element, Exhibit A (Mineral Resources), adopted September 2001.

XIII. NOISE

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

Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The information and analysis provided below is based primarily on the following (refer to Appendix H):

H Noise Technical Modeling, NTEC, May 2022.

Environmental Setting

Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. Table XIII-1 provides examples of A-weighted noise levels from common sources. Although the terms “sound” and “noise” are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.¹⁰³ Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

¹⁰³ California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

**Table XIII-1
A-Weighted Decibel Scale**

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
<i>These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels.</i>	
<i>Source: Cowan, James P., Handbook of Environmental Acoustics, 1993</i>	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq})

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max})

L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{mix})

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00

P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq} .

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded X percent of a specified time period. For example, L_{90} represents the noise level that is exceeded 90 percent of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.¹⁰⁴

Effects of Environmental Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.¹⁰⁵ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.¹⁰⁶

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.¹⁰⁷

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.¹⁰⁸ Changes of 5 dBA may be readily

¹⁰⁴ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁰⁵ National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.

¹⁰⁶ World Health Organization, Guidelines for Community Noise, 1999.

¹⁰⁷ Ibid.

¹⁰⁸ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

perceptible, and changes of 10 dBA are perceived as a doubling in loudness.¹⁰⁹ However, few people are highly annoyed by daytime noise levels below 55 dBA.¹¹⁰

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has found that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100 percent intelligibility of speech sounds.¹¹¹ Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration (such as reading). The EPA has determined that, given the preservation of an indoor noise level associated with 100 percent speech intelligibility (i.e., 45 dBA L_{eq}), the average community reaction is not evident and "7 dBA below levels associated with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distances from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at a rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources, such as highways, attenuates at the rate of 3 dBA for each doubling of distance.¹¹²

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as soft dirt or grass may contribute to increased attenuation rates of up to an additional 8 to 10 dBA per doubling of distance.¹¹³

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Barriers can reduce source noise levels by up to 20 dBA.¹¹⁴ In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.¹¹⁵

¹⁰⁹ Ibid.

¹¹⁰ World Health Organization, Guidelines for Community Noise, 1999.

¹¹¹ EPA, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, 1974.

¹¹² Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, April 2020.

¹¹³ Ibid.

¹¹⁴ Ibid.

¹¹⁵ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, April 2020.

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.¹¹⁶ Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).¹¹⁷

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.¹¹⁸ The threshold of human perception of vibration is approximately 0.01 to 0.02 in/sec PPV.¹¹⁹

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or otherwise evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility

¹¹⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

¹¹⁷ Ibid.

¹¹⁸ Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.

¹¹⁹ Ibid.

considerations between various land uses and exterior noise levels are not regulatory in nature, but are recommendations intended to aid communities in determining their own noise-acceptability standards.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project’s noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown in Table XIII-2.

**Table XIII-2
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use**

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

A = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
C = 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.
N = 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.
U = Clearly Unacceptable - New construction or development should generally not be undertaken.
 Source: Noise Element of the Los Angeles City General Plan – Exhibit I

Policy P16 of the Noise Element instructs to use, “as appropriate,” this table “or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter...”¹²⁰ “Noise sensitive” uses are defined as “single-family and

¹²⁰ Noise Element of the Los Angeles City General Plan, February 1999.

multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.”¹²¹ The Noise Element further instructs that the table is designed “to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels.”

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project’s temporary construction activities and long-term operations.

Section 112.03 “Construction Noise” instructs that “Noise due to construction or repair work shall be regulated as provided by Section 41.40 of this Code.” Section 41.40(a) would prohibit the Project’s construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) 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 is subdivision (a), which institutes a maximum noise limit of 75 dBA at 50 feet for the types of construction vehicles and equipment that would be required for the Project’s construction. However, the LAMC notes that these limitations would not

¹²¹ Ibid.

necessarily apply if it can be proven that compliance 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:

- (a) 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;
- (b) 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;
- (c) 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 devices 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.

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.

Federal Transit Administration

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, county, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. Table XIII-3 shows the FTA’s vibration guidelines for building and structural damage.

**Table XIII-3
FTA Construction Vibration Damage Criteria**

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.</i>	

Existing Conditions

Project Site

The Project Site is currently a vacant, unpaved lot with minimal improvements, though a small northern portion of the site has previously been utilized as a vehicle storage lot for a nearby automotive collision center. As it lacks existing operational facilities and therefore existing noise sources, the Project Site likely generates nominal noise in its present state. Any existing improvements would be demolished and removed prior to the Project’s construction.

Noise-Sensitive Receptors

The Project is located along an urbanized corridor and is surrounded by a diverse mix of residential, commercial, and institutional uses, a number of which would be sensitive to the Project’s noise impacts. The closest noise-sensitive receptors to the Project are as follows:

- South Alfred Street Residences: This receptor consists of residential uses that are located directly east of the Project along South Alfred Street.
- Temple Beth Am: This house of worship is located at 1039 La Cienega Boulevard, approximately 100 feet west of the Project across La Cienega Boulevard.
- Pressman Academy: This school is located at 1055 South La Cienega Boulevard, approximately 100 feet west of the Project across La Cienega Boulevard.

- Beverly Park Senior Apartments: This senior living community is located at 1071 La Cienega Boulevard, approximately 100 feet west of the Project across La Cienega Boulevard.
- La Cienega Park: Though most of this park’s facilities are located well over 500 feet north of the Project, Frank Fenton Field is located approximately 330 feet northwest of the Project at the intersection of La Cienega Boulevard and Olympic Boulevard.

Other noise-sensitive receptors are located at greater distances from the Project and would experience lesser noise impacts than the previously identified receptors. As such, the following analysis focuses on these receptors in order to assess the significance of the Project’s potential noise impacts.

A map showing the location of the Project and the aforementioned noise-sensitive receptors is included in **Appendix H**.

Existing Ambient Noise Conditions

On July 29, 2021, noise measurements were obtained at two locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project Site and nearby sensitive receptors. At both locations, the primary source of noise was vehicular traffic along La Cienega Boulevard. Secondary sources of noise, such as those from surrounding commercial uses and parking lots, were not a significant contributor to noise levels. The measured noise levels are shown in Table XIII-4.

**Table XIII-4
Existing Noise Levels**

Noise Measurement Location	Sound Level (dBA L _{eq})
1. La Cienega Boulevard, near Project	69.2
2. Intersection of La Cienega Boulevard and Whitworth Drive	65.7
<i>Source: NTEC, 2021.</i>	

Impact Analysis

Methodology

On-Site Construction Activities

The Project’s construction noise impact associated with its on-site construction activities was determined by identifying the noise levels of construction equipment with the greatest potential to disrupt nearby sensitive receptors and assessing the noise increases that could result from their operations. Reference equipment noise levels were derived from the Federal Highway Administration’s Roadway Construction Noise Model, version 2.0 (FHWA RCNM 2.0).

Off-Site Construction Activities

The Project’s off-site construction noise impact from construction trucks was projected using the FHWA’s Traffic Noise Model version 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 along

roadway segments. Truck-related roadside noise levels were estimated with TNM 2.5 and then compared with existing ambient noise conditions along La Cienega Boulevard to determine significance.

On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was assessed by identifying likely on-site noise sources and considering the impacts they could produce given the nature of the source (i.e., loudness and/or whether noise would be generated during daytime or more-sensitive nighttime hours), distances to nearby noise-sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC.

Off-Site Operational Noise Sources

The Project's off-site operational noise impact from its related traffic generation was projected using the FHWA's TNM 2.5 noise model. Project-related traffic noise levels were estimated with TNM 2.5 and then compared with existing ambient noise conditions and traffic levels along nearby roadways to determine significance.

Construction Vibration Sources

The Project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at nearby buildings, all based on the principles and guidelines recommended by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories (refer to Table XIII-3).

Operational Vibration Sources

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. The Project proposes to construct a mixed-use residential building with commercial space; no such operations would take place.

Thresholds of Significance

On-Site Construction Noise Threshold

The Project's construction noise impact would normally be considered significant if the following would occur:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA L_{eq} or more at a noise-sensitive land use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq} or more at a noise-sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

The averaging period shall be equivalent to the duration of a single workday, from start to finish of that day’s construction activities.

Operational Noise Thresholds

In addition to applicable City standards and guidelines that would regulate or otherwise manage the Project’s operational noise impacts, the following criteria are adopted to assess the impacts of the Project’s operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within “normally unacceptable” or “clearly unacceptable” noise and land use compatibility categories, as defined by the City’s General Plan Noise Element (see Table XIII-2).
- Project operations would cause any 5 dBA or greater noise increase to a noise-sensitive receptor.¹²²

Groundborne Vibration Threshold

As discussed earlier, there are no federal, state, county, or City standards that would regulate the Project’s vibration impacts from temporary construction activities, nor are there quantitative thresholds. As a result, based on guidance from the City of Los Angeles Department of Planning, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual (see Table XIII-3) are used where applicable and relevant to assist in analyzing the Project’s groundborne vibration impacts.

a. 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 With Mitigation Incorporated. The Project would generate noise during the construction and operational phases. Below is an analysis of the Project’s noise levels and whether these levels would result in a substantial temporary or permanent increase in ambient noise levels in vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

On-Site Construction Activities

Project construction would generate noise during the approximately 32 months of grading, building construction, and other related construction activities. During all construction phases, noise-generating

¹²² As a 3 dBA increase represents a barely noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use’s “normally unacceptable” or “clearly unacceptable” noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. For instances when the noise level increase would not necessarily result in “normally unacceptable” or “clearly unacceptable” noise/land use compatibility, a readily noticeable 5 dBA increase would still be considered significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

activities would be permitted to occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise from grading activities is typically the foremost concern when evaluating a project's construction noise impact, as grading activities often require use of heavy-duty, diesel-powered earthmoving equipment. Given this consideration, the following analysis assesses noise impacts that may result from the Project's grading phase, specifically its bulk excavation activities. The analysis also addresses noise impacts that may result from the Project's foundation pile installation. The Project would utilize either auger-cast piles or deep soil mixing columns (DSM columns), neither of which are "driven" piles that require impact hammering. Both foundation systems have been addressed here. Noise impacts that may result from other construction activities would not exceed those that have been assessed in the analysis below.

Bulk Excavation

Grading for the Project is estimated to last approximately six months. The majority of bulk excavation would be characterized by excavators removing approximately 48,913 cubic yards of cut soils for the Project's foundation and one subterranean level. Excavators can produce noise levels of 75.9 dBA L_{eq} at a reference distance of 50 feet during work cycles. As excavators perform work across the approximately 1.83-acre Project Site, their construction noise levels at sensitive receptors would fluctuate depending on the distances of these vehicles from sensitive receptors. Noise levels would be greater when excavators are in proximity of sensitive receptors and lower when these vehicles are positioned farther away. Notwithstanding this fact, the unmitigated noise impact associated with the Project's bulk excavation has been conservatively modeled by assuming that excavators would spend an entire workday operating at fixed, minimum equipment-to-receptor distances. This screening analysis maximizes construction noise projections for receptors. If the estimated noise levels exceed the screening threshold, then the potential impact is evaluated using more realistic assumptions concerning construction activities.

Table XIII-5 shows the estimated noise increases that would result from the Project's bulk excavation activities. As shown, noise increases at South Alfred Street Residences would exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. However, implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2 (listed later in this analysis) would reduce the noise level to below the significance threshold, and the impact would be less than significant.

**Table XIII-5
Construction Noise Levels – Bulk Excavation (Unmitigated)**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
South Alfred Street Residences	81.0	62.1 ^A	81.0	18.9
Temple Beth Am	68.1	69.2	71.7	2.5
Pressman Academy	68.1	69.2	71.7	2.5
Beverly Park Senior Apartments	68.1	65.7	70.1	4.4
La Cienega Park	58.3	69.2	69.5	0.3
^A The ambient noise level for South Alfred Street Residences, specifically the west-facing portions of these residences that directly abut or face the Project site, was estimated with respect to this receptor's distance from La Cienega Boulevard, its primary source of ambient noise. Source: NTEC, 2022.				

Auger-Cast Pile Installation

If the Project utilizes auger-cast piles, they would be installed under the footprint of the proposed tower. Installation of the Project's auger-cast piles would last approximately two months and require an auger drill rig, a skid steer loader, a crane, a concrete pump, and concrete deliveries (via mixing trucks). During this process, an auger drill rig would bore a cavity that is filled with concrete grout. The concrete grout would be pumped to the drill rig from concrete mixing trucks stationed along La Cienega Boulevard. A crane would then lower a pre-assembled rebar assembly into the grout-filled cavity, and a skid steer loader would remove any loose soils. The auger drill rig and skid steer loader would operate in the vicinity of whichever pile is being installed. However, as noted, the concrete pump and mixing trucks would operate from stations along La Cienega Boulevard. Auger drills can produce noise levels of 87.5 dBA L_{eq} at a reference distance of 50 feet during work cycles. Skid steer loaders can produce noise levels of 72.4 dBA L_{eq} at 50 feet during work cycles. Cranes can produce noise levels of 74.2 dBA L_{eq} at 50 feet. Concrete pumps can produce noise levels of 72.8 dBA L_{eq} at 50 feet. Concrete mixing trucks can produce noise levels of 81.1 dBA L_{eq} at 50 feet. As auger-cast piles are installed across the footprint of the Project's tower, noise levels at receptors would fluctuate depending on the distances between receptors and all involved equipment.

Notwithstanding this fact, unmitigated noise impacts associated with the Project's auger-cast pile installation at the Temple Beth Am, Pressman Academy, Beverly Park Senior Apartments, and La Cienega Park receptors have been conservatively modeled by assuming that all involved construction vehicles and equipment would spend an entire workday operating at fixed, minimum equipment-to-receptor distances. This screening analysis maximizes construction noise projections for receptors. If the estimated noise levels exceed the screening threshold, then the potential impact is evaluated using more realistic assumptions concerning construction activities.

For South Alfred Street Residences, a more factually realistic approach has been taken whereby the modeling has accounted for the fact that the required auger drill rig and skid steer loader would operate across the footprint of the Project's tower on a daily basis and not actually from a fixed, minimum equipment-to-receptor distance.

This was done in part because South Alfred Street Residences is a composite receptor consisting of over ten single-family residences that span nearly 500 feet along the eastern boundary of the Project Site (i.e., this receptor is not a singular land use; it collectively represents a group of individual residences located along South Alfred Street). Impacts to individual residences that comprise this receptor would vary widely, and they would hinge on spatial relationships between the location of construction activities and individual residences. The detailed approach taken for South Alfred Street Residences more-accurately estimates what the impact to a maximally exposed individual residence would be.

Table XIII-6 shows the estimated noise increases that would result from the Project’s installation of auger-cast piles. As shown, noise increases at South Alfred Street Residences, Temple Beth Am, and Pressman Academy would exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. However, implementation of Mitigation Measures MM-NOI-1 and MM-NOI-3 through MM-NOI-5 (listed later in this analysis) would reduce the noise level to below the significance threshold, and the impact would be less than significant. Construction noise levels at other sensitive receptors would not exceed the 5 dBA L_{eq} threshold of significance.

**Table XIII-6
Construction Noise Levels – Auger-Cast Pile Installation (Unmitigated)**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
South Alfred Street Residences	77.0	62.1	77.2	15.1
Temple Beth Am	75.1	69.2	76.1	6.9
Pressman Academy	75.1	69.2	76.1	6.9
Beverly Park Senior Apartments	69.5	65.7	71.0	5.3
La Cienega Park	64.4	69.2	70.4	1.2
<i>Source: NTEC, 2022.</i>				

DSM Column Installation

If the Project utilizes DSM columns, they would be installed under the footprint of the proposed tower. Installation of DSM columns is estimated to last up to approximately two months and would require a drill rig, a loader, an excavator, a slurry batch plant, and a grout pump. During this process, a drill rig would advance a rotating mixing tool into the ground. Cement grout mixed at the batch plant would be pumped to the drill rig and ejected from the bottom of the rig’s mixing tool, which would mechanically mix this grout with soil to form “soilcrete.” A skid steer loader and excavator would remove spoils generated by this mixing operation. The drill rig, excavator, and loader would operate in the vicinity of whichever soil mix column is being installed. The slurry batch plant and grout pump would be stationed on-site. Drill rigs can produce noise levels of 87.5 dBA L_{eq} at a reference distance of 50 feet during work cycles. Loaders can produce noise levels of 72.4 dBA L_{eq} at 50 feet during work cycles. Excavators can produce noise levels of 75.9 dBA L_{eq} at 50 feet. Concrete pumps can produce noise levels of 72.8 dBA L_{eq} at 50 feet. The slurry batch plant may produce noise levels of 86.6 dBA L_{eq} at 50 feet. As DSM columns are installed across the footprint of the proposed tower, noise levels at receptors would fluctuate depending on the distances between receptors and all involved equipment. Notwithstanding this fact,

unmitigated noise impacts associated with the Project’s DSM installation at the Temple Beth Am, Pressman Academy, Beverly Park Senior Apartments, and La Cienega Park receptors have been conservatively modeled by assuming that all involved construction vehicles and equipment would spend an entire workday operating at fixed, minimum equipment-to-receptor distances. This screening analysis maximizes construction noise projections for receptors. If the estimated noise levels exceed the screening threshold, then the potential impact is evaluated using more realistic assumptions concerning construction activities.

For South Alfred Street Residences, a more factually realistic approach has been taken whereby the modeling has accounted for the fact that the required drill rig, excavator, and skid steer loader would operate across the footprint of the proposed tower on a daily basis and not actually from a fixed, minimum equipment-to-receptor distance.

As explained earlier, this was done in part because South Alfred Street Residences is a composite receptor consisting of over ten single-family residences that span nearly 500 feet along the eastern boundary of the Project Site. Impacts to individual residences that comprise this receptor would vary widely, and they would hinge on spatial relationships between the location of construction activities and individual residences. The detailed approach taken for South Alfred Street Residences more-accurately estimates what the impact to a maximally exposed individual residence would be.

Table XIII-7 shows the estimated noise increases that would result from the Project’s installation of DSM columns. As shown, noise increases at South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments would exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period. However, implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7 (listed later in this analysis) would reduce the noise level to below the significance threshold, and the impact would be less than significant. Construction noise levels at other sensitive receptors would not exceed the 5 dBA L_{eq} threshold of significance.

**Table XIII-7
Construction Noise Levels – DSM Column Installation (Unmitigated)**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
South Alfred Street Residences	78.8	62.1	78.9	16.8
Temple Beth Am	75.0	69.2	76.0	6.8
Pressman Academy	75.0	69.2	76.0	6.8
Beverly Park Senior Apartments	71.1	65.7	72.2	6.5
La Cienega Park	66.5	69.2	71.1	1.9
<i>Source: NTEC, 2022.</i>				

Section 112.05 of the LAMC establishes a noise limit of 75 dBA L_{eq} at a distance of 50 feet for powered equipment and hand tools operated within 500 feet of residential zones between the hours of 7:00 A.M. and 10:00 P.M. As the Project is located within 500 feet of numerous residential-zoned properties, this regulation would apply to the Project’s construction noise levels. As noted in the preceding discussion

of the Project's 5 dBA L_{eq} threshold analysis, many of the Project's construction vehicles and equipment would produce noise levels in excess of 75 dBA L_{eq} at a distance of 50 feet. And as shown in Table XIII-6, and Table XIII-7, this would at times expose South Alfred Street Residences and Beverly Park Senior Apartments – the Project's nearest residential sensitive receptors – to noise levels in excess of 75 dBA L_{eq} . However, implementation of Mitigation Measures MM-NOI-1 through MM-NOI-7 (listed below) would reduce the noise level to below 75 dBA L_{eq} at a distance of 50 feet and thus ensure compliance with LAMC Section 112.05. The LAMC Section 112.05 noise limit is not an adopted threshold of significance. This discussion is provided for informational purposes and to demonstrate that the Project's construction would be consistent with LAMC Section 112.05.

Mitigation Measures

To ensure that the Project's construction-related noise increases at sensitive receptors do not exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period, the following mitigation measures are required.

- MM-NOI-1** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's eastern boundary that is adjacent to residential uses along South Alfred Street (i.e., "South Alfred Street Residences"). These sound barriers shall be a minimum 15 feet in height. Sound barriers abutting the Project's boundary with the residence located at 1023 S. Alfred Street shall be a minimum 20 feet in height and shall also be rated to achieve a sound attenuation of at least 15 dBA.
- MM-NOI-2** When bulk excavation activities are taking place, only one excavator or other heavy earthmoving vehicle shall be permitted to operate at any given time within 50 feet of individual residential properties associated with the South Alfred Street Residences receptor.
- MM-NOI-3** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's western boundary that is adjacent to La Cienega Boulevard. These sound barriers shall be a minimum 7 feet in height.
- MM-NOI-4** When in use, concrete mixing trucks and concrete pumps operating from the La Cienega Boulevard public right-of-way, outside the confines of the sound barriers required by Mitigation Measure MM-3, shall be shielded with sound barriers rated to achieve a sound attenuation of at least 10 dBA.
- MM-NOI-5** If auger-cast piles are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily pile installation along these rows shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.
- MM-NOI-6** If DSM columns are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily column installation shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.

MM-NOI-7 The on-site location of any slurry batch plant utilized for the installation of DSM columns shall be either (1) centered within the Project Site, no less than 80 feet from the Project’s eastern or western boundaries or (2) the slurry batch plant shall be shielded by sound barriers rated to achieve a sound attenuation of at least 15 dBA.

Table XIII-8 shows the estimated noise increases that would result from the Project’s bulk excavation activities at South Alfred Street Residences after the implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2. The effectiveness of sound barriers may vary depending on factors such as receptor height, receptor distance from sound barriers, and noise source (i.e., construction equipment) distance from noise barriers. Generally, barrier performance wanes with increasing receptor height and increasing noise source distance from the barrier. Despite this, implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2 would ensure that both ground level and upper-level areas associated with South Alfred Street Residences do not experience noise increases in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, the Project’s bulk excavation-related noise impact from on-site construction sources would be less than significant.

Table XIII-9 shows the estimated noise increases that would result from the Project’s auger-cast pile installation activities at South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments after the implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-4, and MM-NOI-5. As shown, this mitigation would ensure that both ground-level and upper-level areas associated with these receptors do not experience noise increases in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, the Project’s auger-cast pile installation-related impact would be less than significant.

**Table XIII-8
Construction Noise Levels – Bulk Excavation (Mitigated)**

Receptor	Mitigated Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase ^A
South Alfred Street Residences – Ground Level	63.9	62.1	66.1	4.0
South Alfred Street Residences – 2 nd Story	60.1	62.1	64.2	2.1
South Alfred Street Residences – 3 rd Story (1023 S. Alfred St.)	59.5	62.1	64.0	1.9

^A The noise levels shown are based on the shortest distances from bulk excavation-related construction equipment to this receptor.
Source: NTEC, 2022.

**Table XIII-9
Construction Noise Levels – Auger-Cast Pile Installation (Mitigated)**

Receptor	Mitigated Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase ^A
South Alfred Street Residences – Ground Level	62.0	62.1	65.1	3.0

South Alfred Street Residences – 2 nd Story	58.4	62.1	63.6	1.5
South Alfred Street Residences – 3 rd Story (1023 S. Alfred St.)	58.9	62.1	63.8	1.7
Temple Beth Am – Ground Level	65.3	69.2	70.7	1.5
Temple Beth Am – Top Level	65.3	69.2	70.7	1.5
Pressman Academy – Ground Level	65.3	69.2	70.7	1.5
Pressman Academy – Top Level	65.3	69.2	70.7	1.5
Beverly Park Senior Apartments – Ground Level	59.2	65.7	66.6	0.9
Beverly Park Senior Apartments – Top Level	59.2	65.7	66.6	0.9
^A The noise levels shown are based on the shortest distances from auger-cast pile installation-related construction equipment to these receptors. Source: NTEC, 2022.				

Table XIII-10 shows the estimated noise increases that would result from the Project's DSM column installation activities at South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments after the implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7. As shown, these mitigation measures would ensure that both ground level and upper-level areas associated with these receptors do not experience noise increases in excess of the 5 dBA L_{eq} threshold of significance. As a result, with mitigation, the Project's DSM column installation-related impact would be less than significant.

**Table XIII-10
Construction Noise Levels – DSM Column Installation (Mitigated)**

Receptor	Mitigated Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase ^A
South Alfred Street Residences – Ground Level	63.8	62.1	66.1	4.0
South Alfred Street Residences – 2 nd Story	60.1	62.1	64.2	2.1
South Alfred Street Residences – 3 rd Story (1023 S. Alfred St.)	60.9	62.1	64.6	2.5
Temple Beth Am – Ground Level	60.4	69.2	69.7	0.5
Temple Beth Am – Top Level	68.1	69.2	71.7	2.5
Pressman Academy – Ground Level	60.4	69.2	69.7	0.5
Pressman Academy – Top Level	68.1	69.2	71.7	2.5
Beverly Park Senior Apartments – Ground Level	57.0	65.7	66.3	0.6
Beverly Park Senior Apartments – Top Level	67.7	65.7	69.8	4.1
^A The noise impacts shown are based on the shortest distances from DSM column installation-related construction equipment to these receptors. Source: NTEC, 2022.				

As shown in Table XIII-8, Table XIII-9, and Table XIII-10, after the implementation of Mitigation Measures MM-NOI-1 through MM-NOI-7, the Project would not expose any sensitive receptor – residential or

otherwise – to construction noise levels in excess of LAMC Section 112.05's 75 dBA L_{eq} regulatory standard.

Off-Site Construction Activities

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. Excavation for the Project would require an estimated 48,913 cubic yards of cut soils to be removed and exported to a regional landfill. This would generate up to 250 haul trips (125 empty inbound trips and 125 loaded outbound trips) per day during this phase, or about 42 trips per hour when averaged over a daily six-hour hauling period. This would have a marginal effect on roadside noise levels along La Cienega Boulevard and other major thoroughfares that haul trucks would utilize to access the Project Site and the Santa Monica Freeway. According to FHWA TNM 2.5 modeling, 42 haul trips per hour (21 empty inbound trips and 21 loaded outbound trips) would generate roadside noise levels of 62.6 dBA L_{eq} . As field noise measurements indicate that daytime ambient noise levels surrounding La Cienega Boulevard exceed 65 dBA L_{eq} , the Project's 62.6 dBA L_{eq} noise level from haul trucks would not have a substantial effect on roadside ambient noise levels. At Beverly Park Senior Apartments, where the existing daytime ambient noise level is 65.7 dBA L_{eq} – the lowest ambient noise level measured along La Cienega Boulevard as part of the Project's field noise study - the impact would be just 67.4 dBA L_{eq} , a 1.7 dBA increase over existing conditions. This impact would not exceed the 5 dBA L_{eq} threshold of significance, and it demonstrates that the Project's roadside noise impact from haul trucks would be marginal. As a result, the Project's noise impact from off-site construction sources would be less than significant.

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below. The Project's operational noise levels would not exceed the significance threshold of 3 dBA, and impacts would be less than significant.

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noise from mechanical sources such as heating, air conditioning, and ventilation systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, elevated ambient noise levels due to the surrounding urbanized environment, and the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. Additionally, the Project's residential tower would be setback over 60 feet from the site's eastern property line that abuts South Alfred Street Residences.

Furthermore, many surrounding land uses, including commercial and residential uses, also contain rooftop-mounted HVAC equipment. Yet, noise from HVAC equipment was not audible at the time of the field noise study, most likely due to the presence of elevated ambient noise levels in the area surrounding the Project. Given these considerations, the Project's HVAC systems would not have a substantial effect on surrounding ambient noise conditions, nor would they introduce a new major source of noise to the location.

Filtering and pumping equipment for the proposed pools and other water features would also be regulated by LAMC Section 112.02. This equipment would be enclosed in mechanical rooms located within the Project's building envelope and would not be audible at any surrounding receptors.

Auto-Related Activities

The Project would include 426 vehicle parking spaces located in a garage consisting of one below-grade, one at-grade, and two above-grade parking levels. The Project's parking facilities and the intermittent noises associated with them (e.g., doors slamming, engines starting, etc.) would have a nominal effect on surrounding ambient noise levels. According to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 137 vehicles (equal to the Project's maximum gross peak-hour trip generation) would be expected to result in a noise level of just 47.8 dBA L_{eq} at a reference distance of 50 feet. As surrounding ambient noise levels are in excess of 60 dBA L_{eq} , the Project's parking garage-related noise would not contribute to discernible ambient noise increases at surrounding sensitive receptors.

Amenity Space/Open Space

The primary source of noise associated with the Project's balconies and shared amenity areas would be speech/conversation from Project users. Vocal noise from speech and conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.¹²³ Given the rapid attenuation of speech/conversation and the Project's elevated surrounding ambient noise levels, it is unlikely that vocal noises from outdoor uses would be audible at nearby sensitive receptors, let alone capable of causing or contributing to significant noise increases. The ground-level park in the northern portion of the site would be oriented so that seated gathering areas are located adjacent to La Cienega Boulevard and away from the rear (eastern) portion of the property that abuts residences along South Alfred Street. The massing of the Project podium would shield this area from most of these residences, and a masonry wall would provide further separation – and noise attenuation - between this outdoor area and residences. Overall, reasonable use of the Project's exterior amenity spaces and other open spaces would not be expected to result in discernible noise increases at nearby sensitive receptors.

Restaurant Space

The Project's proposed 7,500 square feet of commercial restaurant space would be oriented towards La Cienega Boulevard. This commercial space would include a restaurant with outdoor dining. Any outdoor dining areas would thus be located in a high-noise environment, and the nearest sensitive receptors along La Cienega Boulevard would also be subject to elevated existing ambient noise levels from this roadway. Given these considerations, reasonable use of outdoor dining space would not have any realistic potential to result in substantial increases in surrounding exterior ambient noise levels at nearby sensitive receptors. Noise levels along La Cienega Boulevard would continue to be dominated by traffic.

Overall, the Project would be located along an urbanized corridor with similar dense land uses and accompanying noise sources. The Project is located near a number of other multi-story, multi-family residential buildings, and La Cienega Boulevard also contains any number of street-facing restaurant and retail uses. The Project is therefore consistent with nearby land use types and patterns; it would not

¹²³ EPA, Speech Levels in Various Noise Environments, May 1977.

alter the noise environment of its surroundings by a substantial degree or the minimum 3 dBA CNEL significance threshold.

Off-Site Operational Noise

On a typical weekday, the Project is estimated to result in 1,852 daily vehicle trips. Vehicles would access and depart the Project via driveways from La Cienega Boulevard, meaning that the entirety of Project-related traffic would utilize La Cienega Boulevard. As shown in Table XIII-11, a screening analysis indicates that the Project’s peak-hour traffic would not generate noise levels in excess of 53.0 dBA L_{eq} along La Cienega Boulevard. Given that ambient noise levels along this roadway were measured to be in excess of 65 dBA L_{eq} , Project-related traffic would have no potential to increase noise levels along this roadway by a substantial degree or the minimum 3 dBA CNEL increase that would represent a significant impact. Measurable noise increases, if any, would be just fractions of a decibel. Because Project-related traffic would be distributed across the surrounding roadway network, other nearby roadways such as Olympic Boulevard, Pico Boulevard, and Whitworth Drive would experience much smaller shares of Project traffic and therefore reduced noise impacts. Given these considerations, the Project’s off-site operational noise impact from its related traffic generation would be less than significant.

**Table XIII-11
Project-Related Traffic Noise Levels**

Location	Noise Level – dBA L_{eq}	
	AM Peak Hour	PM Peak Hour
La Cienega Blvd. – 50 feet east of centerline	52.4	53.0
La Cienega Blvd. – 50 feet west of centerline	52.8	52.6
<i>Source: NTEC, 2022.</i>		

b. Result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation Incorporated. Construction of the Project would require the use of earthmoving equipment and vibratory compacting equipment. Large earthmoving vehicles such as excavators can produce groundborne vibration levels up to 0.089 inches per second PPV at a reference distance of 25 feet. As discussed, excavators would be utilized extensively to dig for the Project’s foundation and one subterranean level. Vibratory rollers, used to compact soils and/or asphalt, can produce groundborne vibration levels up to 0.210 inches per second PPV at a reference distance of 25 feet.¹²⁴ Table XIII-12 shows the Project’s estimated groundborne vibration levels from earthmoving vehicles and vibratory rollers at nearby structures.

For South Alfred Residences, a 0.12 inches per second PPV threshold corresponding with the FTA’s Category IV designation for “Buildings extremely susceptible to vibration damage” was conservatively applied. This is the FTA’s most-stringent threshold for vibration damage that is ordinarily applied to extremely fragile historic buildings, ruins, ancient monuments, and similarly sensitive structures. Nearby structures associated with the South Alfred Residences receptor and the South Carthay Historic

¹²⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

Preservation Overlay Zone, specifically the numerous garages and/or accessory structures that abut the Project’s eastern property line, are wood-framed or masonry structures with plaster finishes that do not possess physical or architectural qualities associated with typical Category IV structures. The 0.2 inches per second PPV Category III threshold for “Non-engineered timber and masonry buildings” that may contain plaster would be more consistent with these structures. Nevertheless, in order to maximize the safety afforded to these nearby historic structures and minimize Project-related groundborne vibration impacts to them, the Category IV thresholds have been conservatively applied.

As shown, the Project’s construction activities by earthmoving vehicles and vibratory rollers could expose South Alfred Street Residences and a commercial building at 1080 La Cienega Boulevard to groundborne vibration levels in excess of their respective thresholds of significance. However, implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10 would reduce the groundborne vibration levels to below the significance thresholds, and impacts would be less than significant. Other nearby structures would experience lesser groundborne vibration levels that are below their respective thresholds of significance. Other equipment would result in lower groundborne vibration levels at surrounding structures.

**Table XIII-12
Building Damage Vibration Levels at Off-Site Structures (Unmitigated)**

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Exceed Threshold?
<i>Equipment: Large Earthmoving Vehicles</i>					
South Alfred Street Residences	15	IV. Buildings extremely susceptible to vibration damage ^A	0.12	0.156	Yes
1080 La Cienega Blvd. (Commercial)	5	I. Reinforced concrete, steel, or timber	0.5	0.523	Yes
1016 La Cienega Blvd. (Commercial)	30	I. Reinforced concrete, steel, or timber	0.5	0.073	No
Temple Beth Am	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
Pressman Academy	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
Beverly Park Senior Apartments	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
<i>Equipment: Vibratory Rollers</i>					
South Alfred Street Residences	15	IV. Buildings extremely susceptible to vibration damage	0.12	0.368	Yes
1080 La Cienega Blvd. (Commercial)	5	I. Reinforced concrete, steel, or timber	0.5	1.233	Yes

1060 La Cienega Blvd. (Commercial)	30	I. Reinforced concrete, steel, or timber	0.5	0.172	No
Temple Beth Am	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
Pressman Academy	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
Beverly Park Senior Apartments	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
<p>^A For South Alfred Street Residences, the FTA's Category IV threshold was conservatively applied because this receptor includes contributing structures to the South Carthay Historic Preservation Overlay Zone. Source: NTEC, 2021. Reference vibration levels obtained from the FTA's 2018 Transit Noise and Vibration Impact Assessment manual.</p>					

Mitigation Measures

To ensure that the Project's construction does not expose South Alfred Street Residences and a commercial building at 1080 La Cienega Boulevard to potentially damaging levels of groundborne vibration, the following mitigation measures are required:

MM-NOI-8 Large earthmoving vehicles that are the vibrational equivalent of the FTA's "Large Bulldozer" vibration reference equipment shall maintain a setback of at least 20 feet from South Alfred Street Residences and 6 feet from the commercial building at 1080 La Cienega Boulevard.

MM-NOI-9 Vibratory rollers shall maintain a setback of at least 45 feet from South Alfred Street Residences and 15 feet from the commercial building at 1080 La Cienega Boulevard.

MM-NOI-10 Pre-construction surveys shall be performed to document the existing conditions of contributing structures that are a part of the South Carthay HPOZ ("Contributing Structures") and immediately adjacent to the Project Site. A groundborne vibration and structural/architectural monitoring program shall be implemented and recorded during the Project's excavation and any other phases that require the use of large earthmoving vehicles and/or vibratory rollers to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to these Contributing Structures do not exceed 0.12 inches per second. The performance standards of the groundborne vibration and structural/architectural program shall include the following:

- Prior to the start of construction, a detailed photographic survey shall document existing visible exterior conditions of Contributing Structures that are immediately adjacent to the Project Site. Any existing exterior damage that is visible from the Project Site shall be noted.
- A vibration monitoring system shall be installed at a location that is immediately adjacent to the Project's boundary with Contributing Structures. This system shall continuously measure and store vibration velocities during periods of construction

activity. The system shall provide real-time alerts to a construction supervisor or representative immediately if a vibration velocity of 0.12 inches per second is detected.

- In the event that a vibration velocity of 0.12 inches per second is detected, work shall stop immediately in the vicinity of the affected area and nearby Contributing Structures. Construction activities may not resume until the source of the vibration exceedance has been identified and measures have been taken to prevent vibration-related damage from occurring. If necessary, feasible steps to reduce groundborne vibration levels shall be taken, such as downsizing construction equipment, reducing equipment power levels, or using less impactful techniques.

Table XIII-13 shows the Project’s construction-related groundborne vibration levels at South Alfred Street Residences and the commercial building at 1080 La Cienega Boulevard after the implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10. As shown, this mitigation would ensure that these receptors do not experience potentially damaging levels of groundborne vibration.

**Table XIII-13
Building Damage Vibration Levels at Off-Site Structures (Mitigated)**

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Exceed Threshold?
<i>Equipment: Large Earthmoving Vehicles</i>					
South Alfred Street Residences	20	IV. Buildings extremely susceptible to vibration damage ^A	0.12	0.114	No
1080 La Cienega Blvd. (Commercial)	6	I. Reinforced concrete, steel, or timber	0.5	0.428	No
<i>Equipment: Small Earthmoving Vehicles</i>					
South Alfred Street Residences	1	IV. Buildings extremely susceptible to vibration damage	0.12	0.103	No
1080 La Cienega Blvd. (Commercial)	1	I. Reinforced concrete, steel, or timber	0.5	0.103	No
<i>Equipment: Vibratory Rollers</i>					
South Alfred Street Residences	45	IV. Buildings extremely susceptible to vibration damage	0.12	0.110	No
1080 La Cienega Blvd. (Commercial)	15	I. Reinforced concrete, steel, or timber	0.5	0.368	No
^A For South Alfred Street Residences, the FTA’s Category IV threshold was conservatively applied because this receptor includes contributing structures to the South Carthay Historic Preservation Overlay Zone.					

Operational Vibrations Impact

The Project would not contain any significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. Therefore, the Project's operations-related groundborne vibration impact would be less than significant.

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

No impact. The Project is not located within two miles of a public or public use airport and would not expose people residing or working in the project area to excessive noise levels from aircraft. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The nearest related projects (within 1,000 feet of the Site) are:

- No. 11, 1047 Corning Street, 410 feet west of the Site.
- No. 10, 1049 Holt Street, 715 feet west of the Site.

As discussed previously, the Project's construction activities would temporarily increase ambient noise levels at nearby noise-sensitive land uses. Without mitigation, impacts to South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments would be considered significant. After the implementation of Mitigation Measures MM-NOI-1 through MM-NOI-7, impacts to these receptors would be less than significant, meaning that the Project's construction activities would not increase ambient noise levels at these receptors by more than 5 dBA L_{eq} . Any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at these receptors and result in cumulatively considerable impacts, meaning that the combined effect of construction noise from the Project and other nearby related projects could potentially result in ambient noise level increases in excess of 5 dBA L_{eq} at surrounding sensitive receptors.

Two related projects, which are listed above, have been identified within 1,000 feet of the Project Site. Multiple factors indicate that these related projects would not contribute to cumulatively considerable impacts at shared sensitive receptors.

First, related project No. 11 (1047 Corning Street) is approximately 180 feet west of Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments. Related project No. 10 (1049 Holt Street) is located nearly 500 feet west of these same receptors, and there are numerous intervening multi-story structures that obstruct the line of sight from this related project to these receptors.

Second, construction noise from these related projects would impact the west-facing facades of the Project's sensitive receptors, whereas the Project's construction noise would impact the east-facing facades of these same receptors. The related projects' construction noise would be negligible at the east-facing facades of receptors where the Project's construction noise impact would be greatest. Similarly, the Project's construction noise would be negligible at the west-facing facades of receptors where the related projects' construction noise would be greatest. Given these considerations, there is no potential for construction of these related projects and the Project to result in cumulatively considerable construction noise impacts at shared sensitive receptors.

Concerning vibration, the Project's construction activities would generate groundborne vibrations. Without mitigation, impacts to South Alfred Street Residences and 1080 La Cienega Boulevard could be considered significant. After the implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10, impacts to these receptors would be less than significant. Given the fact that the two related projects are located over 150 feet from the nearest shared receptors – receptors that would themselves experience negligible groundborne vibrations from the Project's construction – there would be no potential for cumulatively considerable construction vibration impacts to occur.

Regarding operations, the Project's on- and off-site operational noise sources would have a minimal effect on surrounding ambient noise levels. Because the related projects are located over 400 feet from the Project, it is unlikely that on-site operational noise sources from the Project and the related projects would be simultaneously audible at any shared sensitive receptors. Therefore, the Project's operations would not meaningfully contribute to any cumulatively considerable noise increases.

XIV. POPULATION AND HOUSING

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

Would the Project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

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

Environmental Setting

The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020-2045 RTP/SCS, reflecting SCAG's most current projections, includes the following proposed growth forecast for population, households, and employment for the City:¹²⁵

- Population: 4,771,300 persons in 2045;
- Households: 1,793,000 households in 2045; and
- Employment: 2,135,900 jobs in 2045.

¹²⁵ SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14, page 35, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579.

Table XIV-1 lists SCAG’s forecasts for population, housing, and employment for the City, as well as the number and percent change.¹²⁶

**Table XIV-1
Population, Housing, and Employment Forecasts for the City**

Year	Population	Housing Units	Employment
2020	4,049,317	1,425,759	1,887,969
2022 (baseline)	4,107,076	1,455,138	1,907,803
2026 (buildout)	4,222,593	1,513,897	1,947,472
2045	4,771,300	1,793,000	2,135,900
<i>Population, housing, and employment data for 2020, 2022 (baseline), 2026 (anticipated buildout year of the Project), and 2045 were calculated based on a linear interpolation of the 2020 to 2045 projections in SCAG’s 2020-2045 RTP/SCS, adopted on September 3, 2020. The interpolated value is calculated using SCAG’s 2020 and 2045 values to find the average increase between years and then applying that annual increase to 2026.</i>			

Project Impacts

Construction

Project construction would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only as long as their specific skills are needed to complete a particular phase of the construction process. Accordingly, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project’s indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the development of 290 new residential multi-family dwelling units and approximately 7,500 square feet of commercial restaurant uses.

As shown in Table XIV-2, the Project would add a residential population of approximately 679 residents to the Project Site.

As shown in Table XIV-3, the Project’s proposed commercial uses would generate approximately 30 new employees.

¹²⁶ Employment information is provided for informational purposes only.

**Table XIV-2
Estimated Project Population Generation**

Land Use	Quantity	Generation Rates	Total
Multi-family Residential	261 units	2.25 person / unit	587.25
Multi-family Residential (Affordable)	29 units	3.14 person / unit	91.06
Total			(678.31) 679

The population factors for single family households and multi-family households were derived from Census data for the City of Los Angeles (United States Census Bureau, ACS 2015, 5-year estimates). The population factors for affordable housing uses were derived from data regarding the affordable housing sites observed within the City of Los Angeles as part of developing empirical trip generation rates and data from the City.

City of Los Angeles, VMT Calculator Documentation, May 2020, Table 1, Land Use and Trip Generation Base Assumptions.

**Table XIV-3
Estimated Employee Generation**

Land Use	Size	Generation Rate	Number of Employees
Proposed Uses			
Commercial	7,500 sf	4 employees / 1,000 sf	30
<i>sf = square feet</i>			
<i>City of Los Angeles, VMT Calculator Documentation, May 2020, Table 1, Land Use and Trip Generation Base Assumptions.</i>			

Population: As shown in Table XIV-4, compared to the anticipated population growth in the City between the 2022 baseline year and the Project’s anticipated buildout year of 2026, the Project’s residential population would represent approximately 0.59 percent of the total forecasted City population growth during that period. The Project’s residential population would represent approximately 0.09 percent of the forecasted population growth between 2020 and 2045.

Housing: As shown in Table XIV-4, compared to the anticipated housing growth in the City of Los Angeles between the 2022 baseline year and the Project’s anticipated buildout year of 2026, the Project’s housing units would represent approximately 0.49 percent of the forecasted City housing growth. The Project’s net housing units would represent approximately 0.08 percent between 2020 and 2045.

Employment: As shown in Table XIV-4, compared to the anticipated employment growth in the City of Los Angeles between the 2022 baseline year and the Project’s anticipated buildout year of 2026, the Project’s employment would represent approximately 0.08 percent of the forecasted City employment growth. The Project’s employment would represent approximately 0.01 percent between 2020 and 2045.

**Table XIV-4
Project Growth Comparison to Growth Forecasts**

Project	Forecast Citywide Growth ¹	% of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2022 to 2026 (Interpolated)		
679 residents	+115,517	0.59
290 units	+58,759	0.49
30 employees	+39,669	0.08
As compared to SCAG Growth Forecast from 2020 to 2045		
679 residents	+721,983	0.09
290 units	+367,241	0.08
30 employees	+247,931	0.01
¹ Refer to Table XIV-1.		

The Project Site is already served by an existing roadway network and utility and public services infrastructure. The Project does not include the development of any new or extended roadways or other infrastructure that would be growth-inducing. As the Project’s estimated population, housing, and employment generation would represent small portions of the forecasted growth in the City, and as the Project would not require the extension of roadways or other growth-inducing infrastructure, the Project would not indirectly or directly induce substantial population growth. Therefore, Project impacts related to population growth would be less than significant.

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

Less Than Significant Impact. The Project Site does not contain any housing or populations and therefore no residents would be displaced as a result of Project construction. The Project would provide 290 multi-family residential units, including 29 Extremely Low Income affordable housing units. As the Project would provide an increase of 290 residential units at the Project Site, the Project would not necessitate the construction of replacement housing elsewhere and impacts would therefore be less than significant.

Cumulative Impacts

The related projects listed in Table 2-8 in Section 2 (Project Description) include development of approximately 723 dwelling units. Coupled with the Project, this would result in approximately 1,013 cumulative dwelling units. It is possible that some of the sites of these related projects already include residential land uses that would be removed with implementation of the related projects, and as such, the total net number of dwelling units that would be created would be fewer than what has been estimated. It is also likely that not all of the related projects will actually be constructed, or may be constructed at lower unit counts than shown, and that many of the units proposed by both the Project and the related projects would be occupied by people already residing in the City of Los Angeles. The housing units associated with related projects development would generate approximately 2,271 residents.¹²⁷

¹²⁷ Based on a conservative 3.14 persons per household rate as identified above in Table XIV-2. $723 \times 3.14 = 2,270.22$.

As shown in Table XIV-5, the cumulative residential population would represent approximately 0.41 percent of the population growth forecast between 2020 and 2045 for the City, and the cumulative housing units would represent approximately 0.27 percent of the housing growth forecast between 2020 and 2045 for the City. The cumulative estimated population, housing, and employment generation would therefore represent small portions of the forecasted growth in the City. Thus, the Project would not directly contribute to cumulatively significant population growth and cumulative impacts would be less than significant.

**Table XIV-5
Cumulative Growth Comparison to Growth Forecasts**

Project	Forecast Citywide Growth ¹	% of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2022 to 2026 (Interpolated)		
2,950 residents	+115,517	2.6
1,013 units	+58,759	1.7
As compared to SCAG Growth Forecast from 2020 to 2045		
2,950 residents	+721,983	0.41
1,013 units	+367,241	0.27
¹ Refer to Table XIV-1.		

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The information and analysis presented below are primarily based on the following (refer to Appendix I):

I-1 School Response, Los Angeles Unified School District, June 22, 2022.

I-2 Park and Recreation Response, Los Angeles Department of Recreation and Parks, May 3, 2022.

I-3 Library Response, Los Angeles Public Library, May 11, 2022.

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if the LAFD could not adequately serve a project, and a new or physically altered fire station would be necessary, the construction of which could cause significant environmental impacts.

Within the City, fire prevention and suppression services and emergency medical services are provided by the Los Angeles Fire Department (LAFD). Project impacts regarding fire protection services are evaluated on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration.

Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant

sizing and placement standards, access, and potential to use or store hazardous materials. The evaluation of the Project's impact on fire protection services considers whether the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand, the construction of which would cause significant environmental impacts.

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 of the LAMC regarding fire flow requirements.

LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

The Project Site is located in an urbanized area of the City that is currently served by existing LAFD services. Fire stations that would serve the Project Site are shown in Table XV-1.

**Table XV-1
Fire Stations Serving the Project Site**

No.	Address	Distance To Site	Equipment	Operational Response Time	Incident Counts
58	1556 Robertson Blvd.	4,800 feet	Assessment Engine Paramedic Ambulance Rescue Ambulance Advanced Practitioner	EMS: 7:04 min Non-EMS: 6:56 min	EMS: 5,036 Non-EMS: 1,215
61	5821 3 rd Street	1.80 miles	Light Force Assessment Engine Paramedic Ambulance Rescue Ambulance EMS Battalion Captain	EMS: 7:14 min Non-EMS: 6:53 min	EMS: 5,768 Non-EMS: 1,545
<p><i>Response Time: (January to December 2021) average time (turnout time + travel time) in the station area.</i> <i>Incident counts: (January to December 2021). Non-EMS is fire emergency. EMS is emergency medical service.</i> http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf <i>Light Force: Truck company and single engine.</i> <i>Task Force: Truck company and two fire engines.</i> <i>LAFD June 2021 Fire Station Directory.</i></p>					

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

Project construction activities would comply with all applicable federal, State, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.¹²⁸

Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. City and State regulations and code requirements would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials.

Further, as described in greater detail under Checklist Topic XVII (Transportation), the Project would implement a Construction Traffic Management Plan (provided as PDF-TRANS-1), which would ensure that adequate and safe access remains available within and near the Project Site and includes traffic management strategies during construction activities. Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur.

Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic.

As such, the Project would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain acceptable fire protection services. Therefore, impacts associated with construction of the Project on fire protection services would be less than significant.

Operation

The generation of residents, employees, and visitors to the Project Site would potentially increase the demand for LAFD services at the Project Site.

Fire Flow

The Los Angeles Department of Water and Power (LADWP) provides water supply to meet the fire flow requirements of the City. Fire flows are supplied by the same water mains as the domestic water system, including the lines located in local streets and major roadways. In general, fire flow requirements are closely related to land use, as the quantity of water necessary for fire protection varies with the type of

¹²⁸ <https://www.dir.ca.gov/title8/1920.html>

development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as site location, building age, or type of construction).

According to LAMC Section 57.512.1,¹²⁹ response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3 (recreated below).¹³⁰

City fire flow requirements, as established in the Fire Code (and shown in Table XV-2), vary from 2,000 gallons per minute (gpm) in low-density residential areas, to 12,000 gpm in high-density commercial or industrial areas. Based on the requirements shown in Table XV-2, the required fire flow for the Project would be 4,000 gpm from four hydrants flowing simultaneously. The Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (plan check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

**Table XV-2
Fire Flow and Response Distance Requirements**

Type of Land Development	Fire Flow	Response Distance	
		Engine	Truck Co.
Residential		Engine	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
Commercial		Engine	Truck Co.
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).	3/4 mile	1 mile
<i>gpm – gallons per minute</i> <i>Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles.</i> <i>The maximum response distances for both L.A.F.D. fire suppression companies (engine and truck) must be satisfied.</i> <i>LAMC Table 57.507.3.3: https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-346877</i>			

¹²⁹ LAMC Section 57,512.1, [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandprevencionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandprevencionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512).

¹³⁰ LAMC Table 57,507.3.3, [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandprevencionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.507.3.3](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandprevencionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.507.3.3)

Response Distance

According to the City, the Project Site is first-served by Station No. 58, which has an engine company and is 4,800 feet from the Project Site

The nearest fire station with a truck company is Station No. 61, approximately 1.80 miles from the Project Site.¹³¹

Response distance requirements from the City Fire Code are provided in Table XV-2. If the distances provided in Table XV-2 are exceeded, fire sprinklers are required.

The fire protection response would be considered adequate. Nevertheless, a fire sprinkler system would be included as part of the Project. Finally, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, appropriately-sized exterior graphics, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, and manual alarm fire boxes, etc.

Given the close proximity of Fire Station No. 61 and the sprinklers and other fire protection systems that would be incorporated into the Project, Project impacts related to response distance would be less than significant.

Hydrants

The following fire hydrants are near the Project Site:¹³²

- Hydrant (ID 34129, size 2½ x 4D, 6-inch main), southeast corner of La Cienega and Olympic.
- Hydrant (ID 43092, size 2½ x 4D, 8-inch main), southeast corner of La Cienega and Whitworth.
- Hydrant (ID 33754, size 2½ x 4D, 8-inch main), southwest corner of La Cienega and Whitworth.

If the Project is determined to require one or more new hydrants during plan check, the Project would have to provide them.

Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., La Cienega Boulevard). During construction, the Project would include a Construction Traffic Management Plan (PDF-TRANS-1), which would ensure adequate emergency access is maintained. All ingress/egress associated with the Project would be designed and constructed in conformance with all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Therefore, the Project would not result in impacts related to

¹³¹ Los Angeles Fire Department, website: <https://www.lafd.org/fire-stations/station-results>, accessed April 14, 2022.

¹³² Navigate LA, DWP (Fire Hydrants) Layer: <http://navigatela.lacity.org/navigatela/>

emergency access. Further, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, Project impacts related to emergency access would be less than significant.

Conclusion

Overall, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered LAFD facilities, or the need for new or physically altered governmental facilities, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, and Project impacts would be less than significant. Furthermore, as described in Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, but not necessarily an increased demand for government services because the obligation to provide adequate fire protection and public safety services remains the responsibility of the City. Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Project impacts would be less than significant.

Cumulative Impacts

Implementation of the related projects, listed in Table 2-8 in Section 2 (Project Description) of this SCEA, could result in a net increase in the number of residents, visitors, and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety.

Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b. Police protection?

Less Than Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services to the Project Site. A significant impact may occur if the LAPD could not adequately serve a project, necessitating a new or physically altered station.

Construction

Construction sites can be sources of attractive nuisances and safety hazards, as well as inviting theft and vandalism. When not properly secured, construction sites can divert local law enforcement from

more pressing matters that require their attention. The Project Applicant would secure the perimeter of the construction site with fencing to prevent trespassing and theft during construction activities and minimize the need for LAPD services. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Therefore, during construction, Project impacts would be less than significant.

Operation

For the purpose of this analysis, a significant impact may occur if the LAPD could not adequately serve a project, necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. The Project Site is currently served by the LAPD's West Bureau, which oversees LAPD operations at the Hollywood, Olympic, Pacific, West LA, Wilshire, and West Traffic stations. The Wilshire Community Police Station, located at 4861 West Venice Boulevard, serves the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Pak, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile (including the Project Site), Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square.

Operation of the Project would result in an increase of site visitors, residents, and employees within the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate (but not in a material way) as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would implement principles of the City of Los Angeles Crime Prevention through Environmental Design (CPTED) Guidelines. Specifically, the Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access.

The building design and layout of the Project would also incorporate nighttime security lighting and secure parking facilities. Public access to the residential portions of the Project will be controlled and secured. In addition, the continuous visible and non-visible presence of residents at all times would provide a sense of security during evening and early morning hours. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In light of these features, it is anticipated that any increase in demands upon police services would be relatively low and would not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Therefore, Project impacts with respect to police protection services would be less than significant.

Overall, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered LAPD facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection, and Project impacts would be less than significant. Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA are limited to adverse changes in the physical conditions within the area of a project, while the protection of the public safety remains the first responsibility of local government where

local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate. Therefore, Project impacts would be less than significant.

Cumulative Impacts

Implementation of the related projects, listed in Table 2-8 in Section 2 (Project Description) of this SCEA, could result in a net increase in the number of residents, visitors, and employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios.

Similar to the Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

c. Schools

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD).

The Project is served by the following LAUSD schools:¹³³

- Carthay Elementary Environmental Studies Magnet (grades K-5), located at 6531 Olympic Boulevard
- Emerson Community Charter (grades 6-8), located at 1650 Shelby Avenue
- Fairfax Senior High (grades 9-12), located at 7850 Melrose Avenue

The residential units directly generate students and the restaurant use employees indirectly generate students through their families. As shown in Table XV-3, the Project would generate a total of approximately 108 students, including 59 elementary students, 17 middle school students, and 32 high school students.

It is likely that some of the students generated by the Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD.

¹³³ LAUSD School Finder: http://rsi.lausd.net/ResidentSchoolIdentifier/.School_Response, Los Angeles Unified School District, June 22, 2022.

**Table XV-3
Estimated Project Student Generation**

Land Use	Quantity	Student Generation			
		Elementary	Middle	High	Total
Residential	290 units	57	16	31	104
Commercial	7,500 sf	2	1	1	4
Total		59	17	32	108
<p><i>LAUSD 2022 Developer Fee Justification Study, March 2022.</i> <i>Students per household: 0.1953 elementary, 0.0538 middle; 0.1071 high school.</i> <i>Students per 1,000 sf: 0.467 for neighborhood shopping centers, 0.195 for lodging.</i> <i>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 55 percent for elementary, 15 percent for middle, and 30 percent for high school.</i> <i>Table: CAJA Environmental Services, May 2022.</i></p>					

While it is possible that some schools serving the Project Site are operating above capacity, all strategies regarding how to accommodate additional students generated by the Project are under the control of the LAUSD. Among these strategies are changes in attendance boundaries, grade reconfigurations, use of portable classroom buildings, and/or additions to existing schools. Further, the number of Project-generated students that would actually attend the LAUSD schools serving the Project Site may be less than the students calculated since the analysis does not take into account options to allow Project-generated students to receive education elsewhere. These options to reduce student population at LAUSD schools include the following:

- Private schools;
- Home-schooling;
- Open enrollment that enables students anywhere within the district to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats;
- Magnet schools and magnet centers that are open to all students in the LAUSD. Transportation is provided to students who participate in magnet programs who live outside a two-mile radius for elementary students, five-mile radius for secondary students, or outside the magnet school attendance boundary;
- The Permits With Transportation (PWT) program, which provides transportation for students seeking a more integrated experience to schools outside their home attendance area;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area in which the student’s parent is regularly employed;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area in which a younger sibling is cared for daily during after school hours by a known child care agency, private organization, or verifiable child care provider.

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. Provisions of the California Education Code, principally the Leroy F. Greene School Facilities Act of 1998, set a maximum level of fees that may be imposed upon a project developer to mitigate a project's impacts on school facilities. The maximum fees authorized under the Education Code apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of the Education Code provide that such funding mechanisms are the exclusive means of requiring mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other State or local law. The Project Applicant will be required to pay mandatory developer fees to offset the Project's demands upon local schools. Thus, the Project's potential impact upon public school services would be less than significant.

Cumulative Impacts

The related projects, listed in Table 2-8 in Section 2 (Project Description) of this SCEA, could result in an increase in the number students in the Project area. However, similar to the applicant of the Project, the applicants of those related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur as a result of their projects. Therefore, cumulative impacts to school services would be less than significant.

d. Parks

Less Than Significant Impact. A significant impact may occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the area of the Project Site.

Per the Public Recreation Plan (PRP) long-range Citywide standard (two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks), the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 persons. Based on the combined neighborhood and community parkland per population ratio of four acres per 1,000 persons, the Project would generate demand for approximately 2.7 acres of new neighborhood and community parkland.¹³⁴

In compliance with LAMC Section 12.21 G and the TOC Guidelines, the Project would include a minimum of 54,540 square feet of open space that is inclusive of common open space areas as well as private (balcony) open space areas. The Project would also provide an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site. This provided open space will provide on-site recreational opportunities for the Project's residents, thereby relieving demand placed upon off-site parks and recreation areas.

¹³⁴ 679 residents/1,000 x 4 = 2.7 acres.

Pursuant to LAMC Section 12.33, (Parks Dedication and Fee ordinance), residential development projects are required to park fees, calculated by the City’s Department of Recreation and Parks (RAP), in order to mitigate the impact the Project will have on public resources such as parks and recreational facilities.¹³⁵ The RAP is responsible for calculating the required park fees owed by each residential development project and issuing the fee calculation letters to Project applicants. The payment of this fee is deemed to provide full and complete mitigation for impacts to parks and recreational facilities. Therefore, impacts to parks and recreational facilities would be less than significant.

Cumulative Impacts

The related projects, listed in Table 2-8 in Section 2 (Project Description) of this SCEA, could result in increased demand for parks and recreational services. The applicants of residential related projects would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

e. Other public facilities

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which could have significant physical impacts on the environment.

Within the City, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. Table XV-4 describes the libraries that serve the Project Site area.

**Table XV-4
Los Angeles Public Libraries**

Name	Address	Size (sf)	Collection Size / Circulation	Service Population	Staff
Baldwin Hills	2906 la Brea Avenue	12,000	32,354 / 37,227	54,951	9
Fairfax	161 Gardner Avenue	12,500	40,098 / 100,714	36,531	11
Robertson	1719 Robertson Boulevard	9,035	47,803 / 103,511	79,753	9
<i>Staffing is full-time equivalent. Current service is estimated from LA Times Mapping LA database and branch library community boundaries. Library Response, Los Angeles Public Library, May 11, 2022.</i>					

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

¹³⁵ City of Los Angeles Department of Recreation and Parks – Park Fees: <https://www.laparks.org/planning/park-fees>.

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.

As discussed in under Checklist Topic XIV (Population and Housing), the Project is estimated to generate approximately 679 net new residents. which could result in incrementally increased demand for library services and resources of the LAPL System. While the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library.

In addition, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown would reduce demand at physical library locations. As such, demand for library facilities would be alleviated by internet service provided throughout the residential and other uses of the Project.^{136, 137} The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Library patrons also have access to podcasts, language learning programs, instructional content, and electronic editions of newspapers and magazines through smartphone applications made available to library cardholders.

Accordingly, the Project would not be anticipated to result in a substantial increase in demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Based on the above, operation of the Project would not create any new exceedance of the capacity of local libraries to adequately serve the existing residential population, that would result in the need for new or altered facilities, or substantially increase the demand for library services for which current and future demand would exceed the ability of the facility to adequately serve the population.

The Project would also generate approximately 30 employees. Employees do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. Further, it is likely that similar to Project residents, Project employees would also have individual access to internet service, which would reduce demand at physical library locations. Therefore, potential impacts to library service and facilities resulting from Project employment generation would be less than significant.

Cumulative Impacts

Implementation of the related projects, listed in Table 2-8 in Section 2 (Project Description) of this SCEA, could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City and would likely be required to implement mitigation where applicable. In addition, the anticipated revenue to the General Fund generated by the related projects through business taxes and other revenue sources would help offset the increase in demand for library services and fund necessary library improvements. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant

¹³⁶ Denise A. Troll, *How and Why Libraries are Changing: What we Know and What we Need to Know*, Carnegie Mellon University, 2002.

¹³⁷ Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. Refer to Checklist Question XV(d) (Public Services – Parks).

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?

No Impact. The Project includes development of a variety of indoor and outdoor private and public open space areas that would serve Project residents, including an approximately 4,500 square-foot publicly accessible pocket park on the northern portion of the Project Site. The impact of developing the Project’s open space is inclusive of the overall impacts of the Project. The Project does not include the construction of recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no Project impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Refer to the discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question XV(d) (Public Services – Parks).

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The information and analysis presented below are primarily based on the following (refer to Appendix J):

J-1 Transportation Assessment, Gibson Transportation Consulting, June 2022.

J-2 Approval Letter, Los Angeles Department of Transportation, July 5, 2022.

Senate Bill 743 (SB 743), made effective in January 2014, required the Governor’s Office of Planning and Research (OPR) to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifted from vehicular delay (level of service [LOS]) to VMT, in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments.

The Los Angeles Department of Transportation’s (LADOT) Transportation Assessment Guidelines (TAG) defines the methodology of analyzing a project’s transportation impacts in accordance with SB 743. Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying impacts:

- Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies
- Threshold T-2.1: Causing Substantial VMT
- Threshold T-2.2: Substantially Inducing Additional Automobile Travel

- Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

An evaluation of the Project’s potential impacts under these metrics follows the TAG and is presented below.

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

Less Than Significant Impact. Threshold T-1 of the TAG states that a project would result in an impact if it conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Table 2.1-1 of the TAG identifies the City plans, policies, programs, ordinances and standards relevant in determining project consistency. Table 2.1-2 of the TAG provides a list of questions to help guide whether a project conflicts with the City’s plans, programs, ordinances, or policies. As discussed below, the Project is consistent with the City documents listed in Table 2.1-1 of the TAG. Therefore, Project impacts under Threshold T-1 would be less than significant.

Mobility Plan

The Mobility Plan combines “complete street” principles with the following five goals and objectives that define the City’s mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice
2. World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. Access for all Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. Collaboration, Communication, and Informed Choices: The impact of new technologies on day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

A detailed analysis of the Project’s consistency with the specific policies of the Mobility Plan is provided in Table XVII-1. The Mobility Plan identifies key corridors within the Project area as components of various “mobility-enhanced networks.” Though no specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a

particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed with the mobility-enhanced networks as a top priority.

Two vehicular driveways would be provided along La Cienega Boulevard, with one-way ingress at the southern driveway and one-way egress at the northern driveway. La Cienega Boulevard currently meets Mobility Plan roadway and ROW standards, and no dedications or widenings would be required. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via commercial and residential entrances along the Project's La Cienega Boulevard frontage. All driveways and access points would be designed consistent with LADOT standards and all ADA requirements. The Project would conform to all design element requirements along the Project frontages to encourage walking and enhance the pedestrian environment.

The Project is located within a TPA and an HQTAs and would provide bicycle parking for residents and visitors, thereby promoting public and active transportation modes and reducing the Project VMT per capita for residents compared to the average for the area. Further, the Project does not propose modifying, removing, or otherwise negatively affect existing bicycle infrastructure.

Thus, the Project would be consistent with the goals of the Mobility Plan.

**TABLE XVII-1
PROJECT CONSISTENCY WITH MOBILITY PLAN 2035**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
Chapter 1 - Safety First	
<p><u>Policy 1.1 Roadway User Vulnerability</u> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p>Consistent. Vehicular access would be provided via one-way ingress at the southern driveway and one-way egress at the northern driveway along La Cienega Boulevard. La Cienega Boulevard provides a two-way left-turn median adjacent to the Project Site. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via commercial and residential entrances along the Project frontage.</p>
<p><u>Policy 1.2 Complete Streets</u> Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.</p>	<p>Consistent. The Project would conform to all design element requirements which may affect public rights-of-way, including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility. The Project would support the mobility goals of the City and help facilitate pedestrian and bicycle accessibility by improving the safety and mobility of all users.</p>
<p><u>Policy 1.6, Multi-Modal Detour Facilities</u> Design detour facilities to provide safe passage for all modes of travel.</p>	<p>Consistent. The construction management plan that would be prepared to address non-CEQA impacts would include detour routes for all applicable travel modes, including pedestrian, bicycle, and transit users.</p>
Chapter 2 - World Class Infrastructure	
<p><u>Policy 2.2 Complete Streets Design Guide</u> Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.</p>	<p>Consistent. The Project would conform to all design element requirements which may affect public rights-of-way, including proper driveway alignment, adequate sidewalk widths, improved lighting elements, and landscaping design which does not hinder sight distance, mobility, or accessibility.</p>
<p><u>Policy 2.3 Pedestrian Infrastructure</u> Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>Consistent. Adjacent to the Project Site, La Cienega Boulevard south of Olympic Boulevard is identified as part of the Mobility Plan's Pedestrian Enhanced Network. The Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. The Project's design would include street trees along the Project frontage to provide adequate shade and enhance the pedestrian environment. Additionally, the Project would provide bicycle and pedestrian access separate from the vehicular driveways via commercial and residential amenity entrances along La Cienega Boulevard, and all vehicular access points would be designed to provide an adequate pedestrian refuge area between the driveways where necessary.</p>
<p><u>Policy 2.4 Neighborhood Enhanced Network</u> Provide a slow speed network of locally serving streets.</p>	<p>Consistent. No streets adjacent to the Project Site are designated as parts of the Mobility Plan's Neighborhood Enhanced Network. The Project would not affect travel speed or safety, impede the development of any future improvements, or interfere with the neighborhood character of any of these streets.</p>
<p><u>Policy 2.5 Transit Network</u> Improve the performance and reliability of existing and future bus service.</p>	<p>Consistent. Adjacent to the Project Site, La Cienega Boulevard south of Olympic Boulevard is designated as part of the Mobility Plan's Transit Enhanced Network. The Project would develop transit-accessible residential and commercial space within an identified Transit Priority Area and High-Quality Transit Area. As discussed in Chapter 2, there is sufficient capacity within the existing and future transit system to accommodate the additional ridership generated by the Project.</p>
<p><u>Policy 2.6 Bicycle Networks</u> Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. (includes scooters, skateboards, rollerblades, etc.)</p>	<p>Consistent. No street adjacent to the Project Site have been identified as part of the Bicycle Lane Network or Bicycle Enhanced Network. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with a bicycle facility. Bicycle parking would also be provided on-site in accordance with LAMC requirements.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in *Mobility Plan 2035: An Element of the General Plan* (Los Angeles Department of City Planning, January 2016).

**TABLE XVII-1 (CONT.)
PROJECT CONSISTENCY WITH MOBILITY PLAN 2035**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
<p><u>Policy 2.9 Multiple Networks</u> Consider the role of each mode enhanced network when designing a street that included multiple modes.</p>	<p>Consistent. La Cienega Boulevard adjacent to the Project Site is identified as part of the Mobility Plan's Transit Enhanced Network and Pedestrian Enhanced Network. The Project would provide ground floor commercial space accessible via La Cienega Boulevard that would serve the adjacent neighborhood. The Project would also improve the adjacent pedestrian facilities to enhance the pedestrian experience as well as to provide safe access to the nearby transit stops.</p>
<p><u>Policy 2.10 Loading Areas</u> Facilitate the provision of adequate on and off-street loading areas.</p>	<p>Consistent. All commercial loading activities would occur on-site as to not disrupt the operations within the public right-of-way.</p>
<p><u>Policy 2.17 Street Widening</u> Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.</p>	<p>Consistent. The Project does not propose modifications to widen streets beyond their required Mobility Plan classifications, nor does the Project require any dedications of right-of-way.</p>
<p>Chapter 3 - Access for All Angelenos</p>	
<p><u>Policy 3.1 Access for All</u> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system.</p>	<p>Consistent. The Project encourages multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project provides separate bicycle and pedestrian entrances and bicycle parking to encourage walking and bicycling. The Project encourages transit usage by developing a mixed-use project, including 29 affordable housing units, located in proximity to transit. The Project would support those residents, employees, and visitors who choose to travel by automobile through the provision of access points along La Cienega Boulevard and an adequate parking supply as allowed for projects within a Transit Oriented Communities Tier 3 area..</p>
<p><u>Policy 3.2 People with Disabilities</u> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>Consistent. The Project's vehicular, bicycle, and pedestrian entrances would be designed in accordance with LADOT standards and would comply with Americans with Disabilities Act (ADA) requirements. The Project design would also be in compliance with all ADA requirements and would provide direct connections to pedestrian amenities along the Project frontage.</p>
<p><u>Policy 3.3 Land Use Access and Mix</u> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>Consistent. The Project's mix of residential, including 29 affordable housing units, and local-serving commercial uses located within proximity to transit helps to minimize vehicle trips and enhance proximity and convenience of residences to jobs and services.</p>
<p><u>Policy 3.4 Transit Services</u> Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>Consistent. The Project is located within one-quarter mile of several Metro local and Santa Monica Big Blue Bus lines, providing residents, employees, and patrons opportunities to travel to the Project Site via multiple public transit services. The Project is also located within one-half mile of the Metro Purple Line (D Line) Extension Wilshire/La Cienega Station.</p>
<p><u>Policy 3.5 Multi-Modal Features</u> Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.</p>	<p>Consistent. The Project would support "first-mile, last-mile solutions" by developing a project located in an active residential and commercial area of the Wilshire community and within one-quarter mile of several local bus lines. Additionally, the Project includes several design features as TDM measures, such as a reduced parking supply, unbundled parking, and the provision of bicycle parking per the LAMC, that will encourage the use of transit and other alternative modes of transportation.</p>
<p><u>Policy 3.8 Bicycle Parking</u> Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.</p>	<p>Consistent. The Project provides infrastructure and services to encourage bicycling for residents, employees, and visitors to the Project Site.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in *Mobility Plan 2035: An Element of the General Plan* (Los Angeles Department of City Planning, January 2016).

**TABLE XVII-1 (CONT.)
PROJECT CONSISTENCY WITH MOBILITY PLAN 2035**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
Chapter 4 - Collaboration, Communication, & Informed Choices	
<p><u>Policy 4.8 Transportation Demand Management Strategies</u> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p>Consistent. The Project incorporates several design features, which include TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, such as a reduced parking supply, unbundled parking, and the provision of bicycle parking per the LAMC.</p>
<p><u>Policy 4.13 Parking and Land Use Management</u> Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	<p>Consistent. The Project would provide sufficient off-street parking as allowed for projects within a TOC Tier 3 area. The Project would also retain the existing on-street parking around Project frontage, to the extent feasible.</p>
Chapter 5 - Clean Environments & Healthy Communities	
<p><u>Policy 5.1 Sustainable Transportation</u> Encourage the development of a sustainable transportation system that promotes environmental and public health.</p>	<p>Consistent. As part of the Project, bicycle parking facilities and improved pedestrian facilities would be provided. This would promote active transportation modes such as biking and walking. Additionally, the Project is located within one-quarter mile of several local bus lines, providing residents, employees, and visitors to the Project with public transportation alternatives.</p>
<p><u>Policy 5.2 Vehicle Miles Traveled (VMT)</u> Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	<p>Consistent. The Project is estimated to generate lower VMT per capita for residents than the average for the area, as demonstrated in Section 4B. Additionally, the Project incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including a reduced parking supply, unbundled parking, and the provision of bicycle parking per the LAMC.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in *Mobility Plan 2035: An Element of the General Plan* (Los Angeles Department of City Planning, January 2016).

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

A detailed analysis of the Project's consistency with Plan for a Healthy Los Angeles is provided in Table XVII-2. The Project prioritizes safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian amenities along the Project frontage. Further, the Project supports healthy lifestyles by locating housing and jobs within a TPA and HQTA, providing bicycle parking, and designing a more comfortable environment for pedestrians.

Thus, the Project would be consistent with the goals of Plan for a Healthy Los Angeles.

**TABLE XVII-2
PROJECT CONSISTENCY WITH PLAN FOR A HEALTHY LOS ANGELES**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
Chapter 1 - Los Angeles, a Leader in Health and Equity	
<p><u>Policy 1.5 Plan for Health</u> Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>Consistent. The Project prioritizes safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian amenities along the Project frontage. The Project supports healthy lifestyles by locating housing and jobs near transit, providing bicycle parking, and designing a more comfortable environment for pedestrians.</p>
<p><u>Policy 1.7 Displacement and Health</u> Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.</p>	<p>Consistent. The Project provides residential, including 29 affordable housing units, and employment opportunities in close proximity to transit. The Project does not displace any existing housing; rather, it converts vacant space into an active and vibrant mixed-use community with improved mobility options.</p>
Chapter 2 - A City Built for Health	
<p><u>Policy 2.1 Access to Goods and Services</u> Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.</p>	<p>Consistent. The Project provides employment and entrepreneurial opportunities for both new residents and existing community members through the development of residential and commercial space.</p>
Chapter 5 - An Environment Where Life Thrives	
<p><u>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction</u> Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p>Consistent. The Project is estimated to generate lower VMT per capita for residents than the average for the area, as demonstrated in Section 4B. Additionally, the Project incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including a reduced parking supply, unbundled parking, and the provision of bicycle parking per the LAMC, as Project design features. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan* (Los Angeles Department of City Planning, March 2015).

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. The Project is located within the Wilshire Community Plan area.

A detailed analysis of the Project's consistency with Wilshire Community Plan is addressed in Table XVII-3. The Project converts vacant space into residential and commercial uses within a TPA and HQTA, in proximity to nearby mixed-use commercial corridors, several local bus lines, and the planned Metro Purple Line (D Line) Extension, and without displacing any existing uses. Thus, the Project would be consistent with the objective to reduce vehicular trips and develop housing in proximity to transportation facilities of Wilshire Community Plan.

LAMC Section 12.21.A.16 (Bicycle Parking)

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The proposed 184 bicycle parking short-term and long-term supply for the Project would satisfy LAMC requirements.

LAMC Section 12.26J (TDM Ordinance)

LAMC Section 12.26J, the TDM Ordinance (1993), establishes trip reduction requirements for non-residential projects in excess of 25,000 sf. The Project does not propose non-residential uses in excess of 25,000 sf. Therefore, LAMC Section 12.26J is not applicable to the Project. However, certain TDM strategies will be employed by the Project such as unbundling parking spaces from the residential units.

Vision Zero Action Plan / Vision Zero Corridor Plans

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. La Cienega Boulevard, south of Whitworth Drive, and Pico Boulevard are identified as part of the High Injury Network (HIN). Thus, the Project Site is not located adjacent to any corridor identified as part of the HIN. Thus, the Project would not interfere with existing Vision Zero improvement projects, nor would the Project preclude future Vision Zero safety improvements by the City. Thus, the Project does not conflict with Vision Zero.

Streetscape Plans

The Project is not located within the boundaries of any streetscape plan and, therefore, streetscape plans do not apply to this Project.

**TABLE XVII-3
PROJECT CONSISTENCY WITH WILSHIRE COMMUNITY PLAN**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
Plan Objectives and Policies	
<p>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.</p> <p>Policy 1-1.3: Provide for adequate Multiple Family residential development.</p>	<p>Consistent. The Project converts vacant space into a mixed-use development, including multi-family housing with 29 affordable housing units.</p>
<p>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.</p> <p>Policy 1-2.1: Encourage higher density residential uses near major public transportation centers.</p>	<p>Consistent. The Project constructs higher density residential uses in close proximity to mixed-use commercial corridors, including Olympic Boulevard and Pico Boulevard, and several local bus lines. The Project is also located within one-half mile of the Metro Purple Line (D Line) Extension Wilshire/La Cienega Station.</p>
<p>Objective 1-4: Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped, and senior citizens.</p> <p>Policy 1-4.1: Provide greater individual choice in type, quality, price, and location of housing.</p> <p>Policy 1-4.2: Ensure that new housing opportunities minimize displacement of residents.</p>	<p>Consistent. The Project would provide multi-family housing, including 29 affordable housing units. No existing residential units would be displaced by the Project.</p>
<p>Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunity for new commercial development and services within existing commercial areas.</p> <p>Policy 1-1.1: New commercial uses should be located in established commercial areas or shopping centers.</p> <p>Policy 1-1.3: Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.</p>	<p>Consistent. The Project converts vacant space into a mixed-use development, including local-serving commercial uses, in close proximity to mixed-use commercial corridors, including Olympic Boulevard and Pico Boulevard, and several local bus lines.</p>
<p>Objective 2-2: Promote distinctive commercial districts and pedestrian-oriented areas.</p> <p>Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.</p>	<p>Consistent. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via commercial and residential entrances along the Project Frontage on La Cienega Boulevard. The Project encourages walking to and from the Project site by designing a more comfortable environment for pedestrians and providing direct connections to nearby pedestrian amenities.</p>
Design Policies for Individual Projects	
<p>A-1 Site Planning: Structures shall be oriented toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts by:</p> <p>b. Minimize the number of driveways/curb cuts which provide access from arterials.</p> <p>c. Maximize pedestrian oriented retail and commercial service uses along street grade level frontages along commercial boulevards.</p>	<p>Consistent. Vehicular access would be provided via one-way ingress at the southern driveway and one-way egress at the northern driveway on La Cienega Boulevard. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via commercial and residential amenity entrances along the Project frontage. The Project would be oriented towards La Cienega Boulevard and designed to further activate the street level frontages and enhance the pedestrian environment.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in the *Hollywood Community Plan*, Los Angeles Department of City Planning, 1988.

Citywide Design Guidelines

The Pedestrian-First Design approach of the Citywide Design Guidelines (Los Angeles City Planning Urban Design Studio, October 2019) identifies design strategies that “create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety.”

The Pedestrian-First Design guidelines are as follows:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

A detailed analysis of the Project’s consistency with the guidelines of the Pedestrian-First Design approach is provided in Table XVII-4.

The Project design includes separate bicycle, pedestrian, and vehicular access points and street trees to provide adequate shade and enhance the pedestrian environment in accordance with the City’s design considerations. Additionally, the Project will be oriented toward La Cienega Boulevard and the active ground floor facilities will ensure the Project engages with the street and its surrounding uses. Thus, the Project design provides for the safety, comfort, and accessibility of pedestrians, aligning with the Pedestrian-First Design approach.

**TABLE XVII-4
PROJECT CONSISTENCY WITH CITYWIDE DESIGN GUIDELINES**

Objective, Policy, Program, or Plan [a]	Analysis of Project Consistency
<i>Pedestrian-First Design</i>	
<p><u>Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all</u></p> <p>Design projects to be safe and accessible and contribute to a better public right-of-way for people of all ages, genders, and abilities, especially the most vulnerable - children, seniors, and people with disabilities.</p> <p><u>Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience</u></p> <p>Design to avoid pedestrian and vehicular conflicts and to create an inviting and comfortable public right-of-way. A pleasant and welcoming public realm reinforces walkability and improves the quality of life for users.</p> <p><u>Guideline 3: Design projects to actively engage with streets and public space and maintain human scale</u></p> <p>New projects should be designed to contribute to a vibrant and attractive public realm that promotes a sense of civic pride. Better connections within the built environment contribute to a livable and accessible city and a healthier public realm.</p>	<p>Consistent. The Project provides for the safety, comfort, and accessibility of pedestrians in a number of ways. First, the Project would separate bicycle and pedestrian access from vehicular access via commercial and residential amenity entrances along the Project frontage. Additionally, the Project's design would include street trees along the project frontage to provide adequate shade and enhance the pedestrian environment.</p> <p>Vehicular access would be provided via a circular driveway along La Cienega Boulevard with one-way ingress at the southern driveway and one-way egress at the northern driveway. La Cienega Boulevard provides a two-way left-turn median adjacent to the Project Site. As discussed above, bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveway. Therefore, it is not anticipated that the Project would result in conflict between pedestrians and vehicles.</p> <p>The Project design includes accessible sidewalks, pedestrian amenities, and vehicular driveways in accordance with the City's design considerations. Further, the orientation of the Project's design and active ground floor facilities ensures that the Project engages with the street and its surrounding uses.</p>
<i>360 Degree Design</i>	
<p><u>Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience</u></p> <p>Design to create livable places and desirable environments where people want to spend time engaging in social, civic, and recreational activities. Projects that encourage connections with a variety of transit modes and enhance their immediate environment with amenities are highly encouraged.</p>	<p>Consistent. The Project design includes elements that reinforce orientation to the street, such as local-serving ground floor commercial space and the Project's connections to the off-site pedestrian facilities. The Project is also located in proximity to active commercial centers of the Wilshire Community and residential neighborhoods, as well as various transit opportunities.</p>
<i>Climate-Adapted Design</i>	
<p><u>Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users</u></p> <p>Design projects to incorporate sustainable design and energy efficiency principles. Encouraging sustainability and innovation contributes to the well-being of current and future generations.</p>	<p>Consistent. The Project would provide street trees to provide adequate shade and a more comfortable environment for pedestrians.</p>

Notes:

[a] Objectives, Policies, Programs, or Plans based on information provided in the Citywide Design Guidelines (Los Angeles Department of City Planning, 2019).

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant Impact. As discussed below, Project impacts related to VMT would be less than significant.

Threshold T-2.1

Threshold T-2.1 states that a residential project would result in a significant VMT impact if it cannot meet the household VMT per capita of 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which a project is located. Similarly, a commercial project would result in a significant VMT impact if it cannot meet the work VMT per employee of 15% below the existing average work VMT per employee for the APC area in which the project is located. The VMT analysis presented below was conducted in accordance with the TAG, which satisfies State requirements under SB 743.

VMT Methodology

The following describes the methodology by which vehicle trips and VMT are calculated in *City of Los Angeles VMT Calculator Version 1.3*, as detailed in *City of Los Angeles VMT Calculator Documentation*. LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

- Home-Based Work Production: trips to a workplace destination originating from a residential use
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use
- Home-Based Work Attraction: trips to a workplace destination originating from a residential use

As detailed in *City of Los Angeles VMT Calculator Documentation*, the household VMT per capita threshold applies to Home-Based Work Production and Home-Based Other Production trips, and the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of Technical Advisory on Evaluating Transportation Impacts in CEQA.

Other types of trips generated in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, those trips are factored into the calculation of total project VMT for screening purposes when determining if VMT analysis would be required.

Table 2.2-1 of the TAG details the following daily household VMT per capita and daily work VMT per employee impact criteria for the APC areas:

APC	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

The Project is located within the Central APC and, therefore, has a daily household VMT per capita impact threshold of 6.0 and a daily work VMT per employee impact threshold of 7.6.

Travel Behavior Zones (TBZ)

The City developed TBZ categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as follows:

1. Suburban (Zone 1): Very low-density primarily centered around single-family homes and minimally connected street network
2. Suburban Center (Zone 2): Low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density
3. Compact Infill (Zone 3): Higher density neighborhoods that include multi-story buildings and well-connected streets
4. Urban (Zone 4): High-density neighborhoods characterized by multi-story buildings with a dense road network

The VMT Calculator determines a project’s TBZ based on the latitude and longitude of a project address. The Project located within a Suburban Center (Zone 2) TBZ.

Mixed-Use Development Methodology

As detailed in *City of Los Angeles VMT Calculator Documentation*, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for a project area:

- The project’s jobs/housing balance

- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

Trip Lengths

The VMT Calculator determines a project's VMT based on trip length information from the City's Travel Demand Forecasting Model, which considers the traffic analysis zones within 0.125 miles of a project to determine the average trip length and trip type, which factor into the calculation of a project's VMT.

Population and Employment Assumptions

As previously stated, the VMT thresholds identified in the TAG are based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions developed based on Census data for the City and employment assumptions derived from multiple data sources, including *2012 Developer Fee Justification Study*, *Trip Generation Manual, 9th Edition*, *the San Diego Association of Governments Activity Based Model*, *the United States Department of Energy*, and other modeling resources. A summary of population and employment assumptions for various land uses is provided in Table 1 of *City of Los Angeles VMT Calculator Documentation*.

TDM Measures

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies. The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking
2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in *Quantifying Greenhouse Gas Mitigation Measures*.

Project VMT Analysis

The VMT Calculator was used to evaluate Project VMT for comparison to the VMT impact criteria. Based on guidance from the City, the VMT Calculator was modeled for the Project's land uses and their respective sizes as the primary input.

As stated in the TAG and per *City of Los Angeles VMT Calculator User*, retail uses (including restaurant uses) totaling less than 50,000 square feet would be considered local-serving and would have a negligible effect on regional VMT. Therefore, the VMT impact of the Project's 7,500 square foot commercial restaurant component would be considered less-than-significant. As such, the VMT analysis presented below evaluates the household VMT per capita generated by the residential uses of the Project.

Project VMT

The Project design incorporates TDM measures that would reduce the number of single occupancy vehicle trips to the Project Site, including a reduced parking supply compared to standard LAMC requirements (per the TOC Guidelines), unbundled parking (per the TOC Guidelines), and the provision of bicycle parking (per the LAMC). Therefore, for the purposes of this analysis, these TDM strategies were considered as Project design features in the VMT Calculator.

The VMT analysis results based on the VMT Calculator are summarized in Table XVII-5. The VMT Calculator estimates that the Project would generate a total daily VMT of 11,780 and a total home-based production VMT of 3,179. Thus, the Project would generate an average household VMT per capita of 4.7. The average household VMT per capita would not exceed the Central APC significant household VMT impact threshold of 6.0 and, therefore, the overall Project would not result in a significant VMT impact, and no mitigation measures would be required.

LADOT reviewed the transportation assessment and confirmed that the Project would not have a significant transportation impact.¹³⁸

**Table XVII-5
VMT Analysis Summary**

	Amount
Project Information	
Multi-Family Housing	261 du
Affordable Housing - Family	29 du
High –Turnover Sit-Down Restaurant	7,500 sf
Project Analysis [a]	
Resident Population	679
Employee Population	30
Project Area Planning Commission	Central
Travel Behavior Zone	Suburban Center

¹³⁸ [Approval Letter](#), Los Angeles Department of Transportation, July 5 2022.

Maximum Allowable VMT Reduction [b]	20%
VMT Analysis [c]	
Daily Vehicle Trips	1,852
Daily VMT	11,780
Total home-Based Production VMT	3,179
Household VMT per Capita [d]	4.7
Impact Threshold	6.0
Significant Impact	NO
Total Work-Based Attraction VMT	214
Work VMT per Employee [e]	6.3
Impact Threshold	NA
Significant Impact	NO
<i>sf = square feet NA = Not Applicable</i>	
<p>[a] VMT results based on the City of Los Angeles VMT Calculator Version 1.3 (July 2020).</p> <p>[b] The maximum allowable VMT reduction is based on the Project's designated TBZ as determined in the Transportation Demand Management Strategies in LA VMT Calculator (LADOT, November 2019) and Quantifying Greenhouse Gas Mitigation Measures (CARB, 2010).</p> <p>[c] Project design features include reduced parking supply, unbundled parking, and the provision of bike parking per LAMC.</p> <p>[d] Based on home-based production trips only</p> <p>[e] The Project provides less than 50,000 sf of commercial retail and restaurant space and is therefore presumed to have a less-than-significant impact according to the TAG.</p> <p>Source: Gibson Transportation Consulting, Inc., June 2022.</p>	

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

Less Than Significant Impact. In accordance with the TAG, further evaluation is required for projects that propose new access points or modifications along the public ROW (i.e., street dedications) under Threshold T-3. A review of Project access points, internal circulation, and parking access would determine if the Project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

Access Overview

Vehicular access to the Project Site would be provided via one-way ingress at the southern driveway and one-way egress at the northern driveway. La Cienega Boulevard provides a two-way left-turn median adjacent to the Project Site that will facilitate left-turns into and out of the driveways. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via retail and residential entrances along La Cienega Boulevard. The Project would not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel.

Project Hazards Analysis

Potential Geometric Design Hazards

The Project would not increase the number of curb cuts along the Project's La Cienega Boulevard frontage. The vehicular driveways would provide adequate sight distance, as La Cienega Boulevard has no curvatures and is relatively level adjacent to the Project Site. The design does not locate impediments that would affect visibility of approaching vehicles, pedestrians, or bicycles. Additionally, the vehicular driveways would intersect La Cienega Boulevard at right angles, to the extent possible, to maximize sight distance.

The Project is estimated to generate fewer than 150 total trips (inbound and outbound) during any single peak hour, which equates to fewer than three vehicles per minute. Additionally, operations are restricted to inbound only at the southern driveway and outbound only traffic at the northern driveway, which reduces conflicts and activity compared to a full-access driveway. The driveways would have the capacity to accommodate the Project trips and, therefore, no queue spillover into the public ROW is anticipated.

Consistency with Modal Priority Networks

The segment of La Cienega Boulevard on which Project vehicular driveways are located is not designated as part of the Bicycle Enhanced Network/Bicycle Lane Network (BEN/BLN), HIN, or Neighborhood Enhanced Network (NEN). Along the Project frontage, La Cienega Boulevard is identified as part of the Transit Enhanced Network (TEN) and Pedestrian Enhanced District (PED). Nevertheless, the designs do not result in any impediments to the visibility of approaching vehicles, pedestrians, or bicycles, and the Project vehicular driveways would intersect La Cienega Boulevard at right angles, to the extent possible, to maximize sight distance and be designed to City standards. Further, all vehicular access points would be designed to provide an adequate pedestrian refuge area between the driveways. The Project would not increase the number of curb cuts along the La Cienega Boulevard frontage and, thus, would limit potential interruptions to pedestrian, bicycle, and vehicle traffic flow. Thus, the Project vehicular driveways would present no substantial conflict with any of those modal priorities. Moreover, the Project would not preclude or interfere with the implementation of future roadway improvements benefiting transit, pedestrians, or bicycles.

Pedestrian and Bicycle Activity

Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via retail and residential amenity entrances along La Cienega Boulevard. The Project would result in a modest increase in both bicycle and pedestrian activity along La Cienega Boulevard; however, the access locations would be designed to accommodate adequate sidewalks and enhanced connectivity that meet the City's requirements to further protect bicycle and pedestrian safety. The driveways would not cross any existing bicycle infrastructure and adequate sight distance exists for drivers entering and/or exiting driveways to see oncoming bicyclists and pedestrians. Therefore, the Project is not anticipated to result in significant vehicle-pedestrian or vehicle-bicycle conflicts.

Summary

Based on the information presented above, the Project would not result in any hazards from the design or operation and would not result in a significant impact.

d. Result in inadequate emergency access

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times.

Vehicular access to the Project Site would be provided from La Cienega Boulevard. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project.

During construction, the Project would include a Construction Traffic Management Plan (provided below as **PDF-TRANS-1**), which would ensure that adequate emergency access exists during construction. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit.

The Project also would not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas.

As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant.

Project Design Feature

PDF-TRANS-1 Construction Traffic Management Plan

Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;
- Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways;
- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Contain construction activity within the Project Site boundaries;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.

Cumulative Impacts

Threshold T-1

Similar to the Project, the Related Projects would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. Thus, the Project, together with the Related Projects, would not result in cumulative impacts with respect to consistency with each of the plans, ordinances, or policies reviewed. The Project and the Related Projects would not interfere with any of the general policy recommendations and/or pilot proposals and, therefore, there would be no significant Project impact or cumulative impact.

Threshold T-2.1

Cumulative effects of development projects are determined based on the consistency with the air quality and GHG emissions reduction goals of SCAG's 2020-2045 RTP/SCS in terms of development location, density, and intensity. The 2020-2045 RTP/SCS presents a long-term vision for the region's transportation system through 2045 and balances the region's future mobility and housing needs with economic, environmental, and public health goals.

As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG emissions reduction goals of the 2020-2045 RTP/SCS.

As described above, the Project would not result in a significant VMT impact. Further, the Project would be designed to further reduce single occupancy trips to the Project Site through various TDM strategies that would be incorporated as part of the Project design, including a reduced vehicular parking supply compared to standard LAMC requirements and the provision of LAMC-required bicycle parking. Therefore, the Project would result in a less-than-significant cumulative impact under Threshold T-2.1 and no further evaluation or mitigation measures would be required.

Furthermore, the Project Site is well-served by various local bus lines, is within 0.50 mile of the D Line extension and would contribute to the productivity and use of the regional transportation system by providing housing near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with 2020-2045 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2020-2045 RTP/SCS goal of maximizing mobility and accessibility in the region.

Threshold T-3

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with Related Projects with access points along the same block as the Project to determine if there may be a cumulatively significant impact. None of the related projects are located along the same block as the Project. Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following (refer to Appendix K):

K Sacred Lands File Search, Native American Heritage Commission, May 18, 2022.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
Less than Significant Impact.

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

determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. AB 52 tribal consultation is not required for a SCEA.

The Project Site has not been 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). Therefore, impacts would be less than significant.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. There is a possibility of encountering a resource.

The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.¹³⁹

The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law so that any potential impacts would be less than significant.

Condition of Approval

Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant 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) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to

¹³⁹ [Sacred Lands File Search](#), Native American Heritage Commission, July 8. 2020.

the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Inadvertent discovery of Human Remains

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or
(323) 343-0714 (after hours, Saturday, Sunday, and holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.

- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Based on these conditions, any potential impacts would be less than significant.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's conditions of approval, Project impacts with respect to tribal cultural resources would be less than significant. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to tribal resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on the following (refer to Appendix L):

L Utility Infrastructure Technical Report, KPFF, August 2022.

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

Less Than Significant Impact. A significant impact may occur if a project would result in the relocation or construction of new or expanded water, wastewater or storm water drainage facilities to such a degree

that the capacity of facilities currently serving the Project Site would be exceeded. As discussed below, Project impacts related to these issues would be less than significant.

Water Treatment

The 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 the 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.

LADWP maintains water infrastructure to the Project Site. Based on available record data provided by NavigateLA, there appears to be a 6” water main in La Cienega Boulevard, and an 8” water main in Whitworth Drive. The Project is anticipated to consist of connections in La Cienega Boulevard to serve the proposed building. The existing condition is an undeveloped lot, but it appears to have existing water meters adjacent to the site. It is likely that new connections will be installed to meet all Fire Department and Department of Building and Safety regulations to serve the proposed building. There two public fire hydrants that exist in the vicinity of the Development Site. There is one fire hydrant at the southwest corner of the La Cienega Boulevard/Whitworth Drive intersection, and one fire hydrant at the southeast corner of this intersection. It is assumed that the existing condition does not have any water demand.

As shown in Table XIX-1, the Project would consume approximately 125,480 gallons of water per day (or approximately 0.125 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the Project. This is a conservative approach. The Project would comply with CalGreen and LAGBC for water conservation, which also reduces wastewater generation. The Project could also utilize greywater and recycled water for landscaping to reduce discharge and to reduce water demand.

With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

**Table XIX-1
Estimated Project Water Consumption¹**

Land Use	Size	Consumption/Generation Rate ²	Total (gallons/day)
Multi-Family Residential - Studio	36 du	75 gpd/du	2,700
Multi-Family Residential – 1-bedroom	158 du	110 gpd/du	17,380
Multi-Family Residential – 2-bedroom	96 du	150 gpd/du	14,400
Restaurant	500 seats	30 gpd/seat	15,000
Swimming Pool ³			64,000
Spa			12,000
Total			125,480

gpd = gallon per day sf = square feet du = dwelling unit

¹ Assumes water consumption is equal to wastewater generation.

² Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012.

³ This analysis considers the condition in which the entire pool volume is discharged, which is a conservative analysis and may not be reflective of daily operation.

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's 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. Nevertheless, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. The results of the Information of Fire Flow Availability Request (IFFAR) and Service Advisory Request (SAR), respectively (in Appendix L of this SCEA), which together demonstrate that adequate water infrastructure capacity exists.

The Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, an SAR was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. Based upon the SAR results, the existing infrastructure is sufficient to meet the demands of the project. The Project's fire flow impacts to water infrastructure would be less than significant.

As mentioned, the approved SAR which is inclusive of anticipated domestic water demands shows that the existing infrastructure is sufficient to meet the water demand of the Project. Therefore, the Project's impacts on water supply would be less than significant.

Wastewater Treatment

The Project Site is located within the service area of the Hyperion Water Reclamation Plant (HWRP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment and a peak wet weather flow of 800 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HWRP currently treats an average daily flow of approximately 275 mgd on a dry weather day.¹⁴⁰ Thus, there is approximately 175 mgd available capacity.

Sanitary sewer is provided by the City of Los Angeles Bureau of Sanitation (BOS). The Site is served by a 42-inch main in La Cienega Boulevard that has a 50% depth/diameter capacity of 17.08 mgd.

The Project would generate an increase of approximately 197,480 gallons of wastewater per day (or 0.2 mgd) (refer to Table XIX-2). This total does not take any credit for any proposed sustainable and water conservation features of the Project, which would generate less wastewater as a result. This is a conservative approach.

¹⁴⁰ City of Los Angeles Sanitation Department, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_afLoop=14693255451939690&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=eljl3h87g_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D14693255451939690%26_afWindowMode%3D0%26_adf.ctrl-state%3Deljl3h87g_5, accessed April 20, 2022.

**Table XIX-2
Estimated Project Wastewater Generation¹**

Land Use	Size	Consumption/Generation Rate²	Total (gallons/day)
Multi-Family Residential - Studio	36 du	75 gpd/du	2,700
Multi-Family Residential – 1-bedroom	158 du	110 gpd/du	17,380
Multi-Family Residential – 2-bedroom	96 du	150 gpd/du	14,400
Restaurant	500 seats	30 gpd/seat	15,000
Swimming Pool ³	1	-	64,000
Spa	2	-	12,000
Sewer Injector	1	72,000	72,000
Total			197,480

gpd = gallon per day sf = square feet du = dwelling unit

¹ Assumes water consumption is equal to wastewater generation.

² Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012.

³ This analysis considers the condition in which the entire pool volume is discharged, which is a conservative analysis and may not be reflective of daily operation.

A Sewer Capacity Availability Request (SCAR) and a Wastewater Services Information request (WWSI) were submitted to see whether the existing public infrastructure can accommodate the Project. The Bureau of Engineering and Bureau of Sanitation have analyzed the Project demands in conjunction with existing conditions and forecasted growth. It is anticipated that the Project will make multiple connections to the public sewer system. During the course of design and permitting, the exact locations of the points of connection will be determined. The approved SCAR allocates an anticipated 100% of flow to the 42” sewer in La Cienega Boulevard, which currently has sufficient capacity to accommodate the loading. Due to this fact and the Response Letter generated by the Bureau of Engineering-Wastewater Engineering Services Division, impacts on wastewater infrastructure would be less than significant.

With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality), Project impacts related to storm drainage facilities would be less than significant.

Natural Gas

Less Than Significant Impact.

Based on substructure maps provided by the City’s Navigate LA database, there appears to be a 2” gas main in La Cienega Boulevard. The existing condition is an undeveloped lot, and it is understood that no significant gas demands currently exist. A Will Serve letter was sent to the gas company to determine if there is sufficient capacity to serve the Project. Based on the response from SoCalGas (in Appendix L of the SCEA), available capacity to serve the project exists. As such, impacts related to gas would be less than significant.

As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Electricity

Less Than Significant Impact.

Based on a visual inspection, it appears that there are existing overhead power lines on the east side of the Project Site. There are also ongoing power upgrades within La Cienega Boulevard. A new 34.5 kV service is currently being installed in La Cienega Boulevard from north of the La Cienega/Whitworth intersection to south of the La Cienega/Pico intersection. This electrical upgrade is scheduled to be completed prior to the start of construction for the 1050 La Cienega Boulevard project. This upgrade will provide additional capacity for the entire area, including our project. LADWP has provided a will serve letter for the Project.

A Will Serve letter was sent to LADWP to determine if there is sufficient capacity to serve the Project. Based on the response from LADWP (in Appendix L of the SCEA), impacts related to electrical services would be less than significant.

As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Telecommunications

Less Than Significant Impact. In the Project area, existing telephone and internet service is readily available from a variety of providers, and existing cable television is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

Water Treatment

Implementation of the Project in conjunction with the related projects (identified in Table 2-8 in Section 2 [Project Description]) of this SCEA) would increase demand for water treatment in the City. As shown in Table XIX-3, below, the related projects in combination with the Project would demand approximately 288,932 gpd (0.3 mgd) of water. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the cumulative water treatment needs for the Project in combination with the related projects. In addition, similar to the Project, the related project would similarly comply with CalGreen and LAGBC for water conservation, which also reduces wastewater generation. Therefore, cumulative impacts related to water treatment would be less than significant.

**Table XIX-3
Cumulative Water Consumption¹**

Land Use	Size	Consumption/Generation Rate²	Total (gpd)
Residential ³	723 du	150 gpd/du	108,540
Commercial/Retail	33,838 sf	25 gpd/1,000 sf	846
Restaurant ⁴	193 seats	30 gpd/seat	5,790
Medical Office	140,305 sf	250 gpd/1,000 sf	35,076
Hotel	110 rooms	120 gpd/room	<u>13,200</u>
Total Related Projects			163,452
<i>Project Total</i>			<i>125,480</i>
Total			288,932
<i>gpd = gallon per day sf = square feet du = dwelling unit</i> ¹ Assumes water consumption is equal to wastewater generation. ² Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012. ³ Assumes all units are 2-bedroom units. ⁴ Assumes 30 sf per seat.			

Wastewater Treatment

Implementation of the related projects listed in Table 2-8 (in Section 2 (Project Description) of this SCEA) could increase the need for wastewater treatment. As shown in Table XIX-4, the related projects in combination with the Project would generate approximately 360,932 gpd (0.36 mgd) of wastewater. For each related project, the City, as part of the building permit process, would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the cumulative project's wastewater flows. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the developer would 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 would be made at that time. Each related project would also pay any required sewer connection fees.

**Table XIX-4
Cumulative Wastewater Generation¹**

Land Use	Size	Consumption/Generation Rate²	Total (gpd)
Residential ³	723 du	150 gpd/du	108,540
Commercial/Retail	33,838 sf	25 gpd/1,000 sf	846
Restaurant ⁴	193 seats	30 gpd/seat	5,790
Medical Office	140,305 sf	250 gpd/1,000 sf	35,076
Hotel	110 rooms	120 gpd/room	<u>13,200</u>
Total Related Projects			163,452
<i>Project Total</i>			<i>197,480</i>
Total			360,932

**Table XIX-4
Cumulative Wastewater Generation¹**

Land Use	Size	Consumption/Generation Rate²	Total (gpd)
<i>gpd = gallon per day sf = square feet du = dwelling unit</i>			
¹ <i>Assumes water consumption is equal to wastewater generation.</i>			
² <i>Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012.</i>			
³ <i>Assumes all units are 2-bedroom units.</i>			
⁴ <i>Assumes 30 sf per seat.</i>			

The related projects would rely on the wastewater treatment services provided by the HWRP, as all related projects are within the service boundaries of the HTP. The capacity of the HTP is 450 million gallons per day and the HTP’s current average wastewater flow is 275 million gpd on a dry weather day. The cumulative sewage generation would therefore be well within the design capacity of the HTP. As such, cumulative impacts with respect to wastewater treatment would be less than significant.

Storm Water Drainage

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Natural Gas

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Electricity

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

In the Project area, existing telephone and internet service is readily available from a variety of providers, and existing cable television is typically provided by Spectrum (formerly Time Warner Cable). The Project Site as well as the sites of the related projects could be served by existing telecommunications facilities that are available in the Project area and would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications facilities would be less than significant.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project 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 receives water from five major sources: 1) the Eastern Sierra Nevada watershed, via the Los Angeles Aqueduct; 2) the Colorado River, via the Colorado River Aqueduct; 3) the Sacramento- San

Joaquin Delta, via the State Water Project and the California Aqueduct; 4) local groundwater; and 5) recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand. Los Angeles Department of Water and Power (LADWP) has adopted the 2020 Urban Water Management Plan to ensure that existing and projected water demand within its service area can be accommodated. According to the LADWP, for any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the 2020 Urban Water Management Plan.

The 2020 UWMP was adopted in May 2021 and projects a demand of 642,600 AFY in 2025 (average weather year).¹⁴¹ The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2020-2045 RTP/SCS.¹⁴² The 2020-2045 RTP/SCS models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).¹⁴³ Neither the UWMP forecasts, nor the 2020-2045 RTP/SCS include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit.

According to Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (2020 UWMP), the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Year, a Single Dry Year, and Multiple Dry Years. The 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021 (2020 UWMP, page 11-13). As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP.

Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in CalGreen, City Ordinance No. 180822¹⁴⁴ and in the LAGBC¹⁴⁵ to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project.

As shown in Table XIX-1, the Project would consume approximately 36,730 gallons of water per day (or approximately 0.037 mgd). According to LADWP, if a project is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most

¹⁴¹ 2020 Urban Water Management Plan, Los Angeles, Exhibit ES-S.

¹⁴² 2020 Urban Water Management Plan, Los Angeles, page 1-5.

¹⁴³ SCAG, 2020-2045 RTP/SCS, Demographic and Growth Forecast, page 3.

¹⁴⁴ <http://clkrep.lacity.org/onlinedocs/2009/09-0510ord180822.pdf>

¹⁴⁵ <http://www.ladbs.org/forms-publications/forms/green-building>

recently adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.¹⁴⁶

As discussed previously under Checklist Topic XI (Land Use), the Project is consistent with the City's General Plan land use designation for the Project Site.

In addition, LADWP further looks to SCAG's growth projections to determine existing and projected water demand, and as discussed under Checklist Topic XIV (Population and Housing), the Project would fall within the population, housing, and employment projections for the City.

Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in City Ordinance No. 180822 and in the City's Green Building Code to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no Project impacts related to water supply would occur and the Project would be adequately served by the LADWP.

Thus, the Project's demand for water could be accommodated by LADWP's existing and projected water supplies, including during normal, dry, and multiple dry years. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects (identified in Table 2-8 in Section 2 (Project Description) of this SCEA) would increase demand for water services provided by the City's water supply system. Through its UWMP, LADWP anticipates its projected water supplies will meet demand through the year 2035. In terms of the City's overall water supply condition, any related project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's RTP and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands.

For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment (WSA) demonstrating sufficient water availability is required on a project-by-project basis. Generally, a project requires a WSA if it a proposed residential development of more than 500 dwelling units, or a commercial shopping center with more than 500,000 square feet of space, or a commercial office with more than 250,000 square feet of space.

None of the related projects meet the threshold requiring a WSA.

Similar to the Project, each related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

¹⁴⁶ LADWP, 2011 UWMP, page 249.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA in an environmental document. The CEQA analysis, similar to this SCEA, would compare the existing to the proposed uses and the ability of LADWP supplies and infrastructure to provide a sufficient level of water service. Future development projects within the service area of LADWP would be subject to the locally mandated water conservation programs, and citywide water conservation efforts would also be expected to partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water supply would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed previously, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

For a full discussion of cumulative impacts with respect to wastewater treatment, please see subsection (a), above. As discussed therein, cumulative impacts related to wastewater treatment would be less than significant.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals.

County landfills are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.¹⁴⁷ Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.¹⁴⁸

Based on the information provided in the 2020 Countywide Integrated Waste Management Plan Annual Report, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 142.67 million tons.¹⁴⁹

¹⁴⁷ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

¹⁴⁸ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 20, 2022.

¹⁴⁹ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 20, 2022.

In 2020, approximately 6.019 million tons of solid waste were disposed of at the County's Class III landfills, 0.244 million tons of inert waste at the County's inert landfill, and 0.338 million tons at transformation facilities.¹⁵⁰

Of the remaining Class III landfill capacity in the County, approximately 74.13 million tons are available to the City (Antelope Valley, Lancaster, and Sunshine Canyon).¹⁵¹

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 2020 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 154.1 million tons in 2031, will exceed the 2020 remaining permitted Class III landfill capacity of 142.67 million tons.

Wasteshed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.

The County's unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 64.64 million tons. In 2020, approximately 0.244 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, this capacity would be exhausted in 25 years.¹⁵² Thus, the unclassified landfill serving the County has adequate long-term capacity.

While the City's Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

¹⁵⁰ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 20, 2022.

¹⁵¹ 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.

¹⁵² County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 20, 2022.

In 2018, the City disposed of approximately 3.3 million tons of solid waste at the County’s Class III landfills, approximately 1,968 tons at transformation facilities, and 214 million tons at the inert landfill.¹⁵³ The 3.3 million tons of solid waste accounts for approximately 4.4 percent of the total remaining capacity (74.13 million tons) for the County’s Class III landfills open to the City.¹⁵⁴

The landfills that serve the City and the capacity of these landfills are shown in Table XIX-5. As shown, the landfills have an approximate available daily intake of 11,839 tons.

**Table XIX-5
Landfill Capacity**

Landfill Facility	2020 Average Daily Disposal (tons/day)	Maximum Daily Disposal (tons/day)	Remaining Daily Capacity (tons/day)	Remaining Capacity (million tons)	Remaining Life (years)
Class III Landfills (Open to the City)					
Antelope Valley	2,468	5,548	3,080	10.18	9
Lancaster	402	5,100	4,698	9.87	21
Sunshine Canyon	8,039	12,100	4,061	54.08	17
Total	10,909	22,748	11,839	74	
Inert Landfill (Open to the City)					
Azusa	1,032	8,000	6,968	64.64	25
County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4# , accessed April 20, 2022.					

As shown in Table XIX-6, the Project would result in approximately 653 tons of construction waste, not accounting for any mandatory recycling.

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

Given the remaining permitted capacity the Azusa Land Reclamation facility, as well as the remaining capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project’s construction solid waste disposal needs.

¹⁵³ 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

¹⁵⁴ 3.3 million tons ÷ 74.13 million tons x 100% = 4.4%.

**Table XIX-6
Project Construction Waste Generation**

Building	Size	Rate¹	Total (tons)
Construction Waste			
Residential	290,190 sf	4.39 pounds / sf	637
Non-residential	7,500 sf	4.34 pounds / sf	16
Total			653
sf = square feet, 1 ton = 2,000 lbs Note: Over the entire total schedule of construction. Numbers have been rounded. 1 cubic foot of asphalt weighs 150 pounds. The asphalt at the site is assumed to be 6 inches thick. ¹ U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, Estimating 2003 Demolition and Materials Amounts, March 2009, Table 2-1, Table 2-2, Table 2-3, Table 2-4: https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts			

As shown in Table XIX-7, the Project would generate approximately 1.79 tons of solid waste per day.

The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices.

**Table XIX-7
Estimated Project Solid Waste Generation**

Land Use	Size	Generation Rate¹	Total (tons)
Multi-Family Residential	290 du	12.23 lbs/day/du	1.77
Restaurant	7,500 sf	5 lbs/day/1,000 sf	0.02
Total			1.79
Note: 1 ton = 2,000 pounds. ¹ Residential solid waste factor (City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2) is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year). Non-residential yearly solid waste generation factors from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002.			

Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025, 95 percent by 2035, and zero waste by 2030.¹⁵⁵

With a remaining daily intake capacity of approximately 11,839 tons of solid waste per day, the landfills serving the City could accommodate the Project's increase of approximately 1.79 tons of solid waste per day.

¹⁵⁵ The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan, and City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAN 2019. <https://plan.lamayor.org/sites/default/files/pLAN2019final.pdf>, accessed April 20, 2022.

The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0009 percent of the remaining capacity for the County’s Class III landfills open to the City of Los Angeles.¹⁵⁶

Based on the above, the landfills that serve the Project Site have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, Project impacts related to solid waste would be less than significant.

Cumulative Impacts

As shown in Table XIX-8, the related projects in combination with the Project would generate approximately 6.71 tons per day of operational solid waste. As shown in Table XIX-5, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. Similar to the Project, the related projects would be required by the City to participate in regional source reduction and recycling programs pursuant to AB 939, which would further reduce the amount of solid waste to be disposed of at the landfills identified in Table XIX-5. Thus, cumulative development would not create the need for new or expanded landfills, and cumulative impacts with respect to solid waste service would be less than significant.

**Table XIX-8
Cumulative Solid Waste Generation**

Land Use	Size	Solid Waste Rates ¹	Total (tpd)
Residential	723 du	12.23 lbs/day/du	4.42
Commercial	198,120 sf	5 lbs/day/1,000 sf	<u>0.50</u>
Total Related Projects			4.92
<i>Project Total</i>			<i>1.79</i>
Cumulative Total			6.71
<i>tpd = tons per day du = dwelling unit lb = pound sf = square feet</i> <i>Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i> ¹ <i>Source: CalRecycle Estimated Solid Waste Generation Rates.</i>			

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal.

In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction

¹⁵⁶ (653 tons per year / 74 million tons per year) x 100 = ~0.0009%

debris. Additionally, the City is currently implementing its “Zero-Waste-to-Landfill” goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process.

The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, as well as the City’s Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur.

Cumulative Impacts

All development in the City, including the Project and the related projects, would be required to comply with the City’s recycling programs. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the Project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

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

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.¹⁵⁷ Therefore, no impact would occur.

Cumulative Impacts

Neither the Project Site nor the related projects are within or near a very high fire severity zone, and the Project would not result in any impacts related to wildfire. Regardless of the degree to which the related projects could result in impacts related to wildfire, the Project does not have the potential to contribute to any cumulative impacts because the Project would not result in any wildfire-related impacts.

¹⁵⁷ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>, accessed April 20, 2022.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant With Mitigation Incorporated. As discussed under Checklist Topic IV (Biological Resources) of this SCEA, the Project would not have the potential to 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. As discussed in response to Checklist Question V(a) (Cultural Resources – Historical Resources) of this SCEA, with implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10, Project impacts related on historical resources would be less than significant. As discussed in response to Checklist Question V(b) (Cultural Resources – Archaeological Resources), with implementation of Mitigation Measure MM-CUL-1, Project impacts on archaeological resources would be less than significant.

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

Less Than Significant Impact. Cumulative impacts for each checklist topic listed in Section 5 of the SCEA have been addressed. As discussed in this section, the Project would not contribute a cumulatively considerable impact to any cumulative impacts outlined in this section.

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

Less Than Significant With Mitigation Incorporated. As discussed under Checklist Topic IX (Hazards and Hazardous Materials) of this SCEA, with implementation of Mitigation Measures MM-HAZ-1 and MM-HAZ-2, Project impacts related to hazards and hazardous materials would be less than significant. As discussed under Checklist Topic XIII (Noise), with implementation of mitigation measures MM-NOI-1 through MM-NOI-10, Project impacts related to noise would be less than significant.

6 SCEA CONDITIONS

The following are the Project-specific conditions imposed on the Project:

- Mitigation measures for cultural resources (archaeological resources), geology and soils (paleontological resources), hazards and hazardous materials (soils management plan and dewatering), and noise and vibration
- Project Design Features for transportation (Construction Traffic Management Plan)
- Condition of Approval (tribal cultural resources and human remains)

There are no SCAG mitigation measures imposed on the Project.

MITIGATION MEASURES

MM-CUL-1 Inadvertent Discovery of Archaeological Resources

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:
 - The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
 - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
 - The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

MM-GEO-1 Inadvertent Discovery of Paleontological Resources

In the event that potential paleontological resources are encountered during the Project's ground-disturbing activities, all work within 50 feet of the potential discovery shall cease, and a qualified paleontologist (Project Paleontologist), who meets the Secretary of Vertebrate Paleontology (SVP) standards, has experience working with asphaltic fossil deposits, and is approved by the Natural History Museum of Los Angeles County (LACM), shall be retained. If deemed necessary by the Project Paleontologist, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) shall be prepared. This plan will address specifics of monitoring and mitigation and will comply with the recommendations of the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. This plan (if deemed necessary) will be subject to the approval of the LACM and submitted to them for review before ground disturbance begins.

The Project Paleontologist shall develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources as well as procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground-disturbing work commences and will include handouts to be given to new workers as needed.

All ground disturbances at the Project Site that occur in previously undisturbed older alluvial sediments that have high paleontological potential shall require monitoring. Monitoring shall be conducted by a Paleontological Monitor, who meets the standards defined in the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Should asphaltic sediments be encountered during excavations, the monitor must also have prior experience or training working in asphaltic sediments and meet the approval of the LACM. Monitoring shall be conducted in accordance with the PRMMP and under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Project Paleontologist and the LACM. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil

specimens and collect associated data. Paleontological monitors shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. When monitoring work is completed, the Project Paleontologist shall prepare a report of the findings of the monitoring plan after construction is completed.

In the event of a fossil discovery, whether by the paleontological monitor or a member of the construction crew, all work shall cease in a 50-foot radius of the find while the Project Paleontologist assesses the significance of the fossil and document its discovery. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and in consultation with the LACM. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. The most likely repository is the LACM, and a repository agreement shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.

MM-HAZ-1 Soil Management Plan

A Soil Management Plan (SMP) shall be prepared for the proposed construction activities. The SMP shall describe the management of impacted soils which may be encountered during Site development, and outline health and safety procedures to minimize risk to onsite workers and personnel. In addition, the SMP shall describe the procedures for export of inert soil for offsite reuse. It is anticipated that data collected during the Phase II investigation and additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse.

The SMP will be developed by a qualified environmental consultant for the site and implemented during site grading and excavation. The SMP would be reviewed by appropriate oversight agencies as follows.

First, a draft version of a complete SMP prepared by a qualified environmental consultant would be submitted to the LAFD for review and comment. At the discretion of the LAFD, the draft SMP may also be provided to other expert agencies, including the Los Angeles County Fire Department Site Mitigation Unit of the Health Hazardous Materials Division (LACFD SMU), the Los Angeles Regional Water Quality Control Board (Water Board), and/or the Department of Toxic Substances Control (DTSC), should the LAFD determine such review is appropriate.

Should the LAFD determine it is necessary, it would provide comments on the draft SMP to the applicant. Additional comments may be provided by the LACFD SMU, the Water Board, or the DTSC, upon the request of the LAFD and the determination by any such agencies that comments are warranted. All such comments, to the extent the agencies determine comments are warranted, would be incorporated into the final draft SMP. The SMP would then be implemented during the soil disturbance and site grading phases of Project construction.

The objective of the SMP is to establish policy and requirements for the management and disposal of soils generated during excavation and redevelopment, and other activities that may disturb potentially contaminated soil. The SMP will address the following elements:

- Specify soil-handling controls required for complying with local, state and federal overseeing agencies.
- Prevent unacceptable exposure to contaminated soil.
- Prevent the improper disposal of contaminated soils.
- Specify the process for identifying, segregating, profiling and disposing of any stained/strong odor soil.
- Specify the soil monitoring requirements during removal of previously identified subsurface structures to visually observe the subsurface conditions following removal and to collect soil samples from the excavation depth and sidewalls as necessary to evaluate the soil for the presence of any contaminants of concern (COCs).
- Specify soil monitoring requirements in the event that stained or odorous soils are encountered in any other areas during excavation activities.
- Specify procedures if any unknown subsurface structures such as USTs, clarifiers, vaults, conduits, or piping are encountered. This may include stopping work, notifying the Environmental Consultant, sampling and analyzing for potential hazardous chemicals, providing recommendations for proper disposal.
- In the event that odorous or discolored soils are identified in accordance with the standards set forth in Rule 1166, Rule 1166 may require the presence onsite during construction activities of a qualified soil monitor to continuously monitor air emissions and record measurements at 15-minute intervals using a direct reading organic vapor analyzer (OVA).
- If it is determined that soil exceeding contamination levels for TPH is identified, in accordance with Rule 1166, the following steps will be taken per the SMP:
 - All monitoring would be conducted at a distance no more than 3 inches above the soil surface using an OVA.
 - Monitoring would be initially conducted at a minimum frequency of one reading every 15 minutes.

- Upon detection of TPH exceeding contamination levels, monitoring would be conducted at a minimum rate of one reading for every five cubic yards excavated.
- Upon detection of TPH exceeding contamination levels, or stained and odorous soils, excavation activities would stop in the vicinity. Representative soil sample(s) would be obtained for analysis.
- The SCAQMD would be notified with 24 hours of the first detection of TPH exceeding contamination levels.
- Soil samples would be collected for characterization and disposal determination.
- All contaminated soil would be segregated and removed from the site to an approved treatment/disposal facility.

At the conclusion of the proposed excavation activities and upon reaching the proposed redevelopment excavation depth, final confirmation soil samples will be collected to confirm the field readings.

- In the event that soil TPH exceeding contamination levels is still present at the proposed excavation depth, additional excavation activities would continue per the SMP (and in accordance with Rule 1166). The additional excavation activities would continue until TPH is below contamination levels. At that time, final confirmation soil samples will again be collected to confirm the field readings.

MM-HAZ-2 Dewatering Treatment System

Since building construction at the Site requires dewatering, a dewatering contractor shall be retained to design a treatment system to discharge to groundwater during construction pursuant to applicable Los Angeles Regional Water Quality Control Board requirements.

MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project’s eastern boundary that is adjacent to residential uses along South Alfred Street (i.e., “South Alfred Street Residences”). These sound barriers shall be a minimum 15 feet in height. Sound barriers abutting the Project’s boundary with the residence located at 1023 S. Alfred Street shall be a minimum 20 feet in height and shall also be rated to achieve a sound attenuation of at least 15 dBA.

MM-NOI-2 When bulk excavation activities are taking place, only one excavator or other heavy earthmoving vehicle shall be permitted to operate at any given time within 50 feet of individual residential properties associated with the South Alfred Street Residences receptor.

- MM-NOI-3** Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's western boundary that is adjacent to La Cienega Boulevard. These sound barriers shall be a minimum 7 feet in height.
- MM-NOI-4** When in use, concrete mixing trucks and concrete pumps operating from the La Cienega Boulevard public right-of-way, outside the confines of the sound barriers required by Mitigation Measure MM-3, shall be shielded with sound barriers rated to achieve a sound attenuation of at least 10 dBA.
- MM-NOI-5** If auger-cast piles are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily pile installation along these rows shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.
- MM-NOI-6** If DSM columns are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily column installation shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.
- MM-NOI-7** The on-site location of any slurry batch plant utilized for the installation of DSM columns shall be either (1) centered within the Project Site, no less than 80 feet from the Project's eastern or western boundaries or (2) the slurry batch plant shall be shielded by sound barriers rated to achieve a sound attenuation of at least 15 dBA.
- MM-NOI-8** Large earthmoving vehicles that are the vibrational equivalent of the FTA's "Large Bulldozer" vibration reference equipment shall maintain a setback of at least 20 feet from South Alfred Street Residences and 6 feet from the commercial building at 1080 La Cienega Boulevard.
- MM-NOI-9** Vibratory rollers shall maintain a setback of at least 45 feet from South Alfred Street Residences and 15 feet from the commercial building at 1080 La Cienega Boulevard.
- MM-NOI-10** Pre-construction surveys shall be performed to document the existing conditions of contributing structures that are a part of the South Carthay HPOZ ("Contributing Structures") and immediately adjacent to the Project Site. A groundborne vibration and structural/architectural monitoring program shall be implemented and recorded during the Project's excavation and any other phases that require the use of large earthmoving vehicles and/or vibratory rollers to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to these Contributing Structures do not exceed 0.12 inches per second. The performance standards of the groundborne vibration and structural/architectural program shall include the following:
- Prior to the start of construction, a detailed photographic survey shall document existing visible exterior conditions of Contributing Structures that are

immediately adjacent to the Project Site. Any existing exterior damage that is visible from the Project Site shall be noted.

- A vibration monitoring system shall be installed at a location that is immediately adjacent to the Project's boundary with Contributing Structures. This system shall continuously measure and store vibration velocities during periods of construction activity. The system shall provide real-time alerts to a construction supervisor or representative immediately if a vibration velocity of 0.12 inches per second is detected.
- In the event that a vibration velocity of 0.12 inches per second is detected, work shall stop immediately in the vicinity of the affected area and nearby Contributing Structures. Construction activities may not resume until the source of the vibration exceedance has been identified and measures have been taken to prevent vibration-related damage from occurring. If necessary, feasible steps to reduce groundborne vibration levels shall be taken, such as downsizing construction equipment, reducing equipment power levels, or using less impactful techniques.

PROJECT DESIGN FEATURES

PDF-TRANS-1 Construction Traffic Management Plan

Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;

- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;
- Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways;
- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Contain construction activity within the Project Site boundaries;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.

Condition of Approval

Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant 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) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Inadvertent discovery of Human Remains

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

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

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.