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

INITIAL STUDY

Barlow Skilled Nursing Facility Project

Case Number: ENV-2021-7160-MND

Project Location: 2000 Stadium Way, Los Angeles, California, 90026

Community Plan Area: Silver Lake—Echo Park—Elysian Valley

Council District: 1—Cedillo

Project Description: The Project proposes to add a new Skilled Nursing Facility to the existing Barlow Respiratory Hospital campus. The primary objective of the new Skilled Nursing Facility is to allow intensive care patients who have been newly removed from mechanical ventilation support to continue recovery without leaving the campus where they can be continuously monitored by physicians. The new building would be an 80,454-square-foot, 59.5-foot tall building containing 150 patient beds. The building would house all the services required by the Office of Statewide Health Planning and Development in four levels over one basement level. The Skilled Nursing Facility would be located on the site of an existing surface parking lot along Stadium way and would include a ground-floor parking garage with ingress/egress from an internal road/drive with direct access to Stadium Way. The building would be situated along Stadium Way with landscaping screening the west elevation.

Construction of the Skilled Nursing Facility would require demolition of two existing on-grade parking lots. ZA 93-0922 established a base requirement of 123 parking spaces for the current hospital facilities. Currently, 177 parking spaces are provided. Based on the parking requirements for Convalescent Home (LAMC Section 12.21.A4(d)(5)), 30 parking spaces are required to serve the Skilled Nursing Facility (150 x 0.2 = 30); resulting in a cumulative total of 153 required spaces after completion of the Project. As part of the Project, two new on-grade parking lots will be added to the campus. One lot would be located northeast of the new Skilled Nursing Facility, east of existing bungalows, with ingress/egress from a proposed new internal roadway with access to Stadium Way just north of the Skilled Nursing Facility. Construction of this parking lot would require the demolition of a vacant, 926-square-foot maintenance shed (Building 26) and 430-square-foot slab from a previously-demolished building (formerly Building 27). The second parking facility would also be on-grade along Stadium Way, just north of the existing Library and west of William's Hall, with ingress/egress from an existing internal roadway with direct access to Stadium Way. The latter parking facility would be screened with landscaping along the west side, adjacent to Stadium Way. After completion of the Project, 165 parking spaces will be provided at the Hospital campus, including 30 spaces within the ground floor of the Skilled Nursing Facility. There are 9 protected trees, 16 non-protected trees and 7 protected street trees, for a total of 34 trees on the Project Site and Public Right-of-way. Of the 9 protected trees on the project site, 6 trees (Tree Nos. 19, 20, 22, 23, 32, and 33) will be impacted by the Project. Of the 16 non-protected trees, 9 trees will be removed. The 7 protected street trees will remain intact. The Project includes the planting of 114 trees onsite. The Project also includes the export of 2,800 cubic yards of dirt.

The Project Site is designated as Los Angeles Historic-Cultural Monument No. 504 and is listed as the Barlow Sanitorium Historic District on the California Register of Historical Resources.

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

APPLICANT:
Amit Mohan, Chief Executive Officer
Barlow Respiratory Hospital

October 2022

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1 INTRODUCTION

An application for the proposed Barlow Skilled Nursing Facility (SNF) Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and the preparation of an Initial Study is required. This Initial Study evaluates potential environmental effects resulting from construction and operation of the proposed Project. Based on the analysis provided within this Initial Study, the City has concluded that the Project would not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This Initial Study and Mitigation Negative Declaration (IS/MND) is intended as an informational document and is ultimately required to be adopted by the decision makers prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

5 PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Contains a list of the project design features and mitigation measures required for implementation of the project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**THE BARLOW SKILLED NURSING FACILITY PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2021-7160-MND**
RELATED CASES	**AA-2021-7161-PMLA** **DIR-2021-7159-SPR** **ZA-1993-0922-CUZ-PA1-PA2**

PROJECT LOCATION	**2000 STADIUM WAY, LOS ANGELES, CA 90012**
COMMUNITY PLAN AREA	SILVER LAKE—ECHO PARK—ELYSIAN VALLEY
GENERAL PLAN DESIGNATION	OPEN SPACE
ZONING	A1-1VL
COUNCIL DISTRICT	1—CEDILLO

LEAD CITY AGENCY	**CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING**
STAFF CONTACT	Y**I LU**
ADDRESS	221 N. FIGUEROA STREET, SUITE 1350 LOS ANGELES, CALIFORNIA 90012
PHONE NUMBER	(213)-978-1287
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APPLICANT	**BARLOW RESPIRATORY HOSPITAL**
ADDRESS	2000 STADIUM WAY LOS ANGELES, CA 90012
PHONE NUMBER	(213) 202-6845

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Yi Lu	213-978-1287
PRINTED NAME	**PHONE NUMBER**
	10-14-2022
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes to add a new Skilled Nursing Facility to the existing Barlow Respiratory Hospital campus. The primary objective of the new Skilled Nursing Facility is to allow intensive care patients who have been newly removed from mechanical ventilation support to continue recovery without leaving the campus where they can be continuously monitored by physicians. The new building would be an 80,454-square-foot, 59.5-foot tall building containing 150 patient beds. The building would house all the services required by the Office of Statewide Health Planning and Development in four levels over one basement level. The Skilled Nursing Facility would be located on the site of an existing surface parking lot along Stadium way and would include a ground-floor parking garage with ingress/egress from an internal road/drive with direct access to Stadium Way. The building would be situated along Stadium Way with landscaping screening the west elevation.

Construction of the Skilled Nursing Facility would require demolition of two existing on-grade parking lots. ZA 93-0922 established a base requirement of 123 parking spaces for the current hospital facilities. Currently, 177 parking spaces are provided. Based on the parking requirements for Convalescent Home (LAMC Section 12.21 A4(d)(5)), 30 parking spaces are required to serve the Skilled Nursing Facility (150 x .2 = 30); resulting in a cumulative total of 153 required spaces after completion of the Project. As part of the Project, two new on-grade parking lots will be added to the campus. One lot would be located northeast of the new Skilled Nursing Facility, east of existing bungalows, with ingress/egress from a proposed new internal roadway with access to Stadium Way just north of the Skilled Nursing Facility. Construction of this parking lot would require the demolition of a vacant, 926-square-foot maintenance shed (Building 26) and 430-square-foot slab from a previously-demolished building (formerly Building 27). The second parking facility would also be on-grade along Stadium Way, just north of the existing Library and west of William's Hall, with ingress/egress from an existing internal roadway with direct access to Stadium Way. The latter parking facility would be screened with landscaping along the west side, adjacent to Stadium Way. After completion of the Project, 165 parking spaces will be provided at the Hospital campus, including 30 spaces within the ground floor of the Skilled Nursing Facility. There are 9 protected trees, 16 non-protected trees and 7 protected street trees, for a total of 34 trees on the Project Site and Public Right-of-way. Of the 9 protected trees on the project site, 6 trees (Tree Nos. 19, 20, 22, 23, 32, and 33) will be impacted by the Project. Of the 16 non-protected trees, 9 trees will be removed. The 7 protected street trees will remain intact. The Project includes the planting of 114 trees onsite. The Project also includes the export of 2,800 cubic yards of dirt.

The Project Site is designated as Los Angeles Historic-Cultural Monument No. 504 and is listed as the Barlow Sanitorium Historic District on the California Register of Historical Resources.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 2000 Stadium Way in the Silver Lake—Echo Park—Elysian Valley Community Plan Area in the City of Los Angeles ("City"). The Barlow Respiratory Hospital (BRH) campus is a triangular-shaped parcel, fronting Stadium Way to the west, Scott Avenue to the northeast, and Boylston Street to the southeast. As shown in **Figure 3-1, Regional Project Location**, at the end of **Section 3, Project Description**, regional access to the area of the Project Site is provided by the Golden State Freeway (Interstate [I] 5) via Stadium Way, approximately 1.3 miles to the north; State Route 110 (SR 110) via Stadium Way, approximately 0.7-mile to the southeast; and U.S. Route 101 via Glendale Boulevard, approximately 0.7-mile to the southwest. Local access to the Project Site is provided via driveways along Stadium Way and Scott Avenue. The Project Site is located approximately 0.25-mile east of the Sunset/Douglas bus stop and northeast of the Sunset/Vin Scully-Dodger Stadium bust stop, both for Los Angeles County Metropolitan Transportation Authority ("Metro") Line 2 service with stops every 20 minutes during weekdays and every 30 minutes during weekends and Line 4 service with stops every 10 minutes on weekdays and weekends.

3.2.2 Existing Conditions

The approximately 10.68-acre (465,211 square-foot) Project Site consists of one lot associated with Assessor Parcel Number (APN) 5415-012-001. As shown in **Figure 3-2, Existing Conditions**, and **Figure 3-3, Project Site Photos**, at the end of **Section 3**, the BRH campus is currently developed with 26 1- and 2-story buildings and structures totaling 100,031 square feet gross floor area, including the 26,817-square-foot Barlow Respiratory Hospital building. In 1992, the BRH campus was designated as a Los Angeles Historic-Cultural Monument (HCM [Monument No. 504]). Subsequently, BRH was listed on the California Register of Historical Resources (CRHR) as an historic district (Barlow Sanitorium Historic District [Historic District]), and was determined eligible for listing on the National Register of Historic Places (NRHP). A technical report prepared in 2012 concluded that there are a total of 38 buildings and landscape features of the BRH campus and that 32 are contributing to the significance of the Historic District. The Project Site currently contains 177 parking spaces, including 7 handicapped spaces, in 9 parking areas. Parking areas and internal roadways are accessible via three existing driveways along Stadium Way and two existing driveways along Scott Avenue. The development area portion of the Project Site contains a total of 34 trees, including 9 protected on-site trees consisting of 7 coast live oak trees (*Quercus agrifolia*), 1 Toyon (Heteromeles arbutifolia), and 1 Elderberry (Sambucus nigra); and 7 City street trees consisting of 5 Tasmania blue gum trees (*Eucalyptus globulus*), 1 Canary Island date palm tree (*Phoenix canariensis*), and 1 Toyon (Heteromeles arbutifolia).

The Project Site is zoned A1-1VL (Agriculture in Height District 1VL) and has a General Plan Land Use Category of Open Space. The Project Site is also located in a Transit Priority Area (Zoning Information File [ZI] No. 2452, a Tier 1 Transit Oriented Community (TOC), a Special Grading Area (BOE Basic Grid Map A-13372), an Urban Agriculture Incentive Zone, and a Very High Fire Hazard Severity Zone, and is subject to the Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations

(ZI No. 2462), Historic Preservation Review, and the Equine Keeping in the City of Los Angeles Checklist (ZI No. 2438).

3.2.3 Surrounding Land Uses

The land uses within the general vicinity consist of Elysian Park and Montecillo de Leo Politi Picnic Area to the north across Scott Avenue; single-family residences to the northeast along Boylston Street; Dodger Stadium and associated surface parking lots to the east across Boylston Street; single-family residences to the south along Vin Scully Avenue; and cottages and other residences associated with the BRH campus and Lilac Terrace Park to the west across Stadium Way, with single-family and multi-family uses further west across Elysian Park Drive.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

BRH operates as an acute-care, in-patient care facility with a total of 105 beds licensed as a long-term, acute-care hospital, and is a preeminent respiratory facility in the country. The typical BRH patient is admitted from an acute-care hospital after spending weeks or months on a ventilator. After recovering at BRH, these patients are transferred to offsite SNFs or sent home. The Project proposes to construct an onsite SNF in order to enable patients to continue recovery without leaving the campus where they can be continuously monitored by physicians.

The new SNF would be located in the southern portion of the existing campus on the site of an existing surface parking lot, and would be an 80,454-square-foot, 59.5-foot tall building containing 150 patient beds. The building would house all the services required by the Office of Statewide Health Planning and Development in four levels over one basement level. The basement level would contain mechanical and electrical systems as well as employee locker rooms and a kitchen. Access to the basement level would be provided via a separate, dedicated elevator lobby to be located in a service island between the proposed SNF and the existing Guild House, as well as an internal stairwell within the southern end of the building. The ground-floor level would contain on-grade vehicle and bicycle parking, additional mechanical and generator systems rooms, a lobby with elevator banks to the upper floors, and a coffee shop, as well as employee offices and a physical/occupational therapy room. Floors 2 through 4 would each contain 25 patient rooms and a private bathroom, including 1 semi-private room and 24 double rooms; an employee office; and a dining/activity room with a separate warming kitchen. Floors 2 and 3 would have a balcony at the northern and southern ends of the building, while Floor 4 would have a balcony at the southern end. All non-basement floors would be accessed via the lobby elevator banks as well as internal stairwells proposed for both the northern and southern ends of the building. A summary of the proposed SNF building development is presented in **Table 3-1, Development Summary**, and proposed site plans, building sections, and renderings are presented in **Figure 3-4** through **Figure 3-18** at the end of **Section 3**.

Table 3-1
Development Summary

	Number of Beds	Size (sf)
Room Type		
Semi-Private	6 (1 room per floor)	411 (346 room + 57 bath)
Double	144 (24 rooms per floor)	340 (290 room +44 bath)
Floor Area		
Basement		8,400
Floor 1		16,310
Floor 2		18,450
Floor 3		18,647
Floor 4		18,647
Total	**150 (75 rooms)**	**80,454**

sf = square feet
Source: Zakian Woo Architects, Barlow Respiratory Hospital Skilled Nursing Facility, Entitlements Application, December 24, 2020.

In connection with Project financing, As shown in **Figure 3-19, Preliminary Parcel Map**, the Applicant is proposing to subdivide the existing parcel into three separate parcels with boundaries generally determined by existing and proposed uses of the Project Site. Parcel 1 would be a 216,706-square-foot (4.98-acre) parcel generally located in the central and northwestern portion of the Project Site that would contain the BRH, Administration Building, Library, Williams Hall, Birge Hall, cottages, and bungalows. Parcel 2 would be a 91,979-square-foot (2.11-acre) parcel generally located in the northeastern portion of the Project Site that would contain Bosworth Hall. Parcel 3 would be a 156,528-square foot (3.59-acre) parcel generally located in the southern portion of the Project Site that would contain the proposed SNF building, Guild House, the Receiving Department Building, and other shops and shed structures.

As shown on **Figure 3-20, Site Demolition Plan**, construction of the Project would require the demolition of a vacant, 926-square-foot maintenance shed (Building 26), a 430-square-foot slab from a previously-demolished building in the central portion of the Project Site (formerly Building 27), and two existing parking lots in the southern portion of the Site. The maintenance shed (Building 26) has been identified as a contributing building to the Barlow Sanitorium Historic District. The Project would not remove any protected or City street trees, however, construction activities would encroach on six protected trees that include four coast live oak trees (*Quercus agrifolia*) identified as Tree Nos. 19, 20, 22, and 23, 1 Toyon (Heteromeles arbutifolia) identified as Tree No. 32, and 1 Elderberry (Sambucus nigra) identified as Tree No. 33 in the Tree Report (Appendix B).

3.3.2 Open Space and Landscaping

A total of 34 trees are located within or near the area proposed for development under the Project, including 9 protected trees onsite, 7 street trees, and 16 non-protected trees onsite The Project does not propose to remove any protected or City street trees, however, the Project will encroach on 6 protected trees identified as Tree Nos. 19, 20, 22, 23, 32, and 33 in **Appendix B**. The Project does not propose to remove any protected or City street trees, however the Project would require the removal of nine non-protected onsite trees. As shown on **Figure 3-21, Existing and Proposed Planting Schedule**, a total of 114 trees are proposed to be planted in the development area of the Project Site, primarily

as screening along Stadium Way and proposed structures, as well as along internal roadways and parking areas. The proposed planting would include 7 deodar cedar trees (*Deodar cedar*), 2 kaffirboom coral trees (*Erythrina caffra*), 5 Chinese flame trees (*Koelreuteria bipinnata*), 44 watermelon red crape myrtle trees (*Lagerstroemia indica*), 22 coast live oak (*Quercus agrifolia*), and 34 Brisbane box trees (*Tristania conferta*).

3.3.3 Access, Circulation, and Parking

Vehicular access to the SNF building and new parking lot proposed for the central portion of the Project Site, east of the bungalows would be via a driveway just north of the proposed SNF building. The driveway would have divided lanes for ingress and egress separated by a landscaped median. The ingress lane would have a dedicated, onsite turning lane along Stadium Way. The driveway would provide vehicular access to the proposed internal roadway with access to the on-grade parking within Floor 1 of the SNF building and the proposed new parking lot to the northeast. Vehicular access to the second proposed new parking lot to be located north of the Library building would be via an existing driveway mid-block along Stadium Way. The Project would not alter any other vehicular access points. Pedestrian access to the SNF building of the Project Site would be via Stadium Way to the proposed internal roadway to the Floor 1 lobby. Vehicular and pedestrian access and circulation can be seen in **Figure 3-22, Access, Circulation, and Street Plan**.

The Project would involve the removal, relocation, and re-striping of parking spaces throughout the Project Site. A total of 177 parking spaces currently exists at the Project Site within nine parking lots and areas striped for parking, including along internal roadways. According to Zoning Amendment ZA 1993-0922, the existing hospital campus uses have a base parking requirement of 123 parking spaces. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.21.A4(d)(5), 30 parking spaces are required to serve the proposed Skilled Nursing Facility, resulting in a total requirement of 165 spaces to serve the hospital campus upon completion of the Project. The Project would remove 87 existing parking spaces and, through construction of on-grade parking within the SNF building and two proposed new parking lots and re-striping of additional existing lots, would provide 75 new parking spaces. In total, 165 parking spaces would be provided at the Project Site, exceeding the requirement by 12 spaces. A summary of existing and proposed parking spaces by parking area is presented in **Table 3-2, Vehicle Parking Summary**, and viewed in **Figure 3-2, Existing Conditions**, and **Figure 3-4, Proposed Site Plan**.

Table 3-2
Vehicle Parking Summary

	Existing	Proposed
Type		
Standard	163	149
Compact	7	8
Handicap (regular)	6	6
Handicap (van)	1	2
Total	**177**	**165**

Table 3-2
Vehicle Parking Summary

	Existing	Proposed
Area		
Parking Area 1	38	43
Parking Area 2	16	16
Parking Area 3	5	5
Parking Area 4	24	37
Parking Area 5	51	26
Parking Area 6	28	30
Parking Area 7	8	3
Parking Area 8	3	--
Parking Area 9 (ADA)	4	5
Total	**177**	**165**

Pursuant to LAMC Section 12.21 A.16.(a)(2), the Project would be required to provide bicycle parking at a ratio of 1 short-term space per 10,000 square-feet and 1 long-term space per 5,000 square-feet. Accordingly, the 80,454-square-foot Project would provide 8 short-term and 16 long-term bicycle parking spaces for a total of 24 bicycle parking spaces. Long-term bicycle parking spaces would be provided at the service island between the proposed SNF building and the existing Guild House. Short-term bicycle parking spaces would be provided in the on-grade parking area within Floor 1 of the SNF building.

3.3.4 Anticipated Construction Schedule

The Project would be constructed over approximately 14 months. Construction activities would include clearing and removal of non-protected trees; demolition of the engineering building, slab, and parking areas; construction of SNF building and new parking lots; and restriping of existing parking lots. Demolition activities are anticipated to start in November 2022, and construction completion and building occupancy is anticipated in January 2024. The Project would require approximately 2,800 cubic yards of soil export. Exported soil would likely be disposed at Sunshine Canyon Landfill in Sylmar.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The IS/MND will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. City departments, commissions, and councils that may use this IS/MND in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council. The 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 17.50, Parcel Map Recordation clearance for subdivision for three parcels and a request to the Advisory Agency for the waiver of dedication and improvements on Stadium Way, Scott Avenue and Boylston Street;

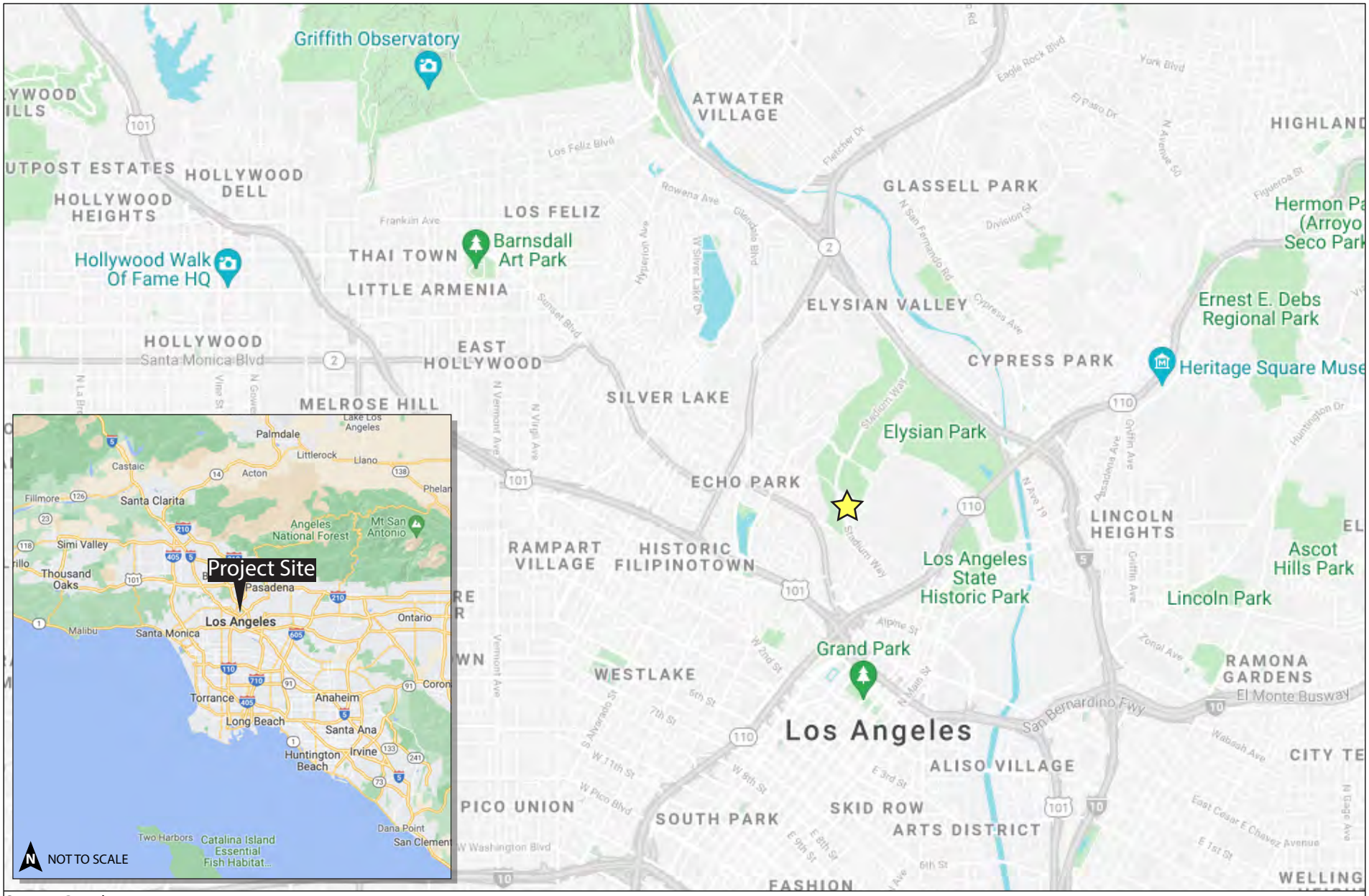
(2) Review pursuant to LAAC Section 22.171.14(b) for alteration to an Historic-Cultural Monument;

(3) Pursuant to LAMC Sections 12.24.M and 12.24.F, Approval of Plans;

(4) Pursuant to LAMC Section 6.05, Site Plan Review for a Project creating more than 50,000 square feet of non-residential floor area;

(5) Pursuant to Building Code Section 91.7003, approval of haul route; and

(6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to, haul route approval, grading permits, excavation permits, foundation permits, and building permits, in order to execute and implement the Project.

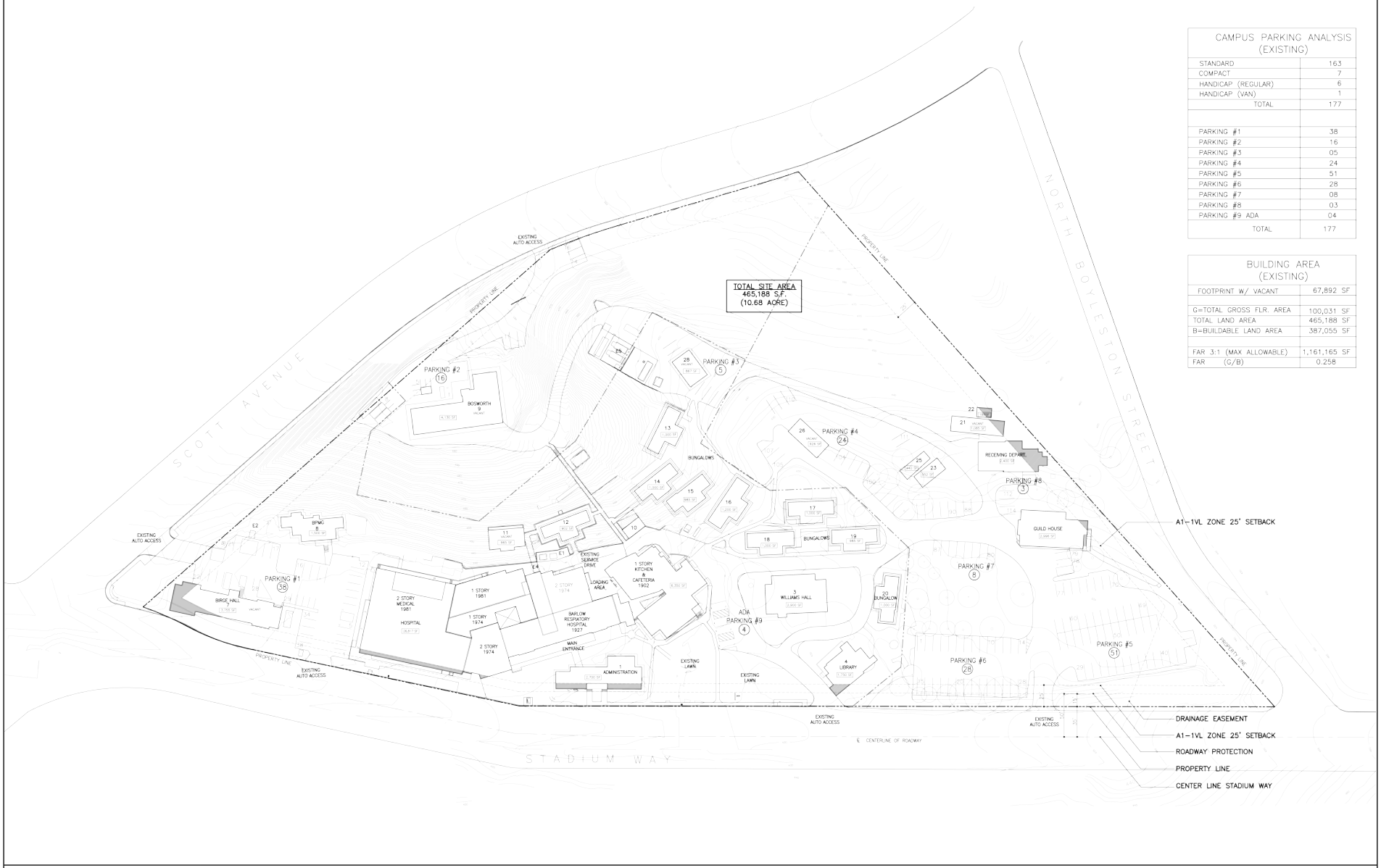


Source: Google, 2021

★ Project Site

0 0.5 1 1.5 2
Scale (Miles)

Figure 3-1
Regional Project Location



Source: Zakian Woo Architects, 2022

N

0 100 200 300 400

Scale (Feet)

Figure 3-2
Existing Conditions

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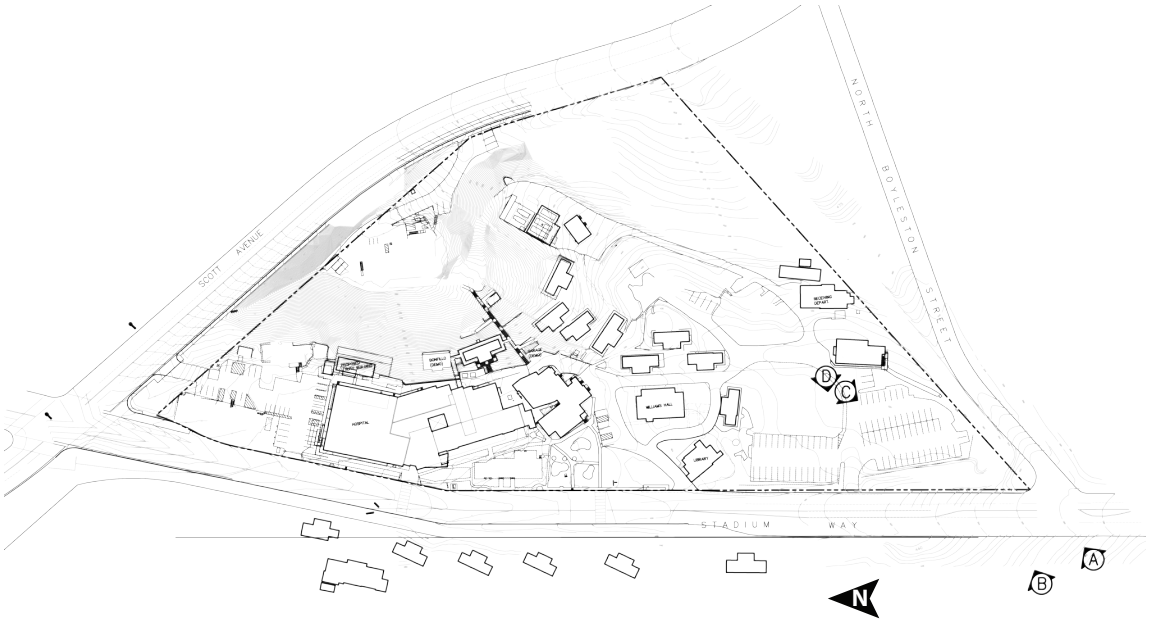

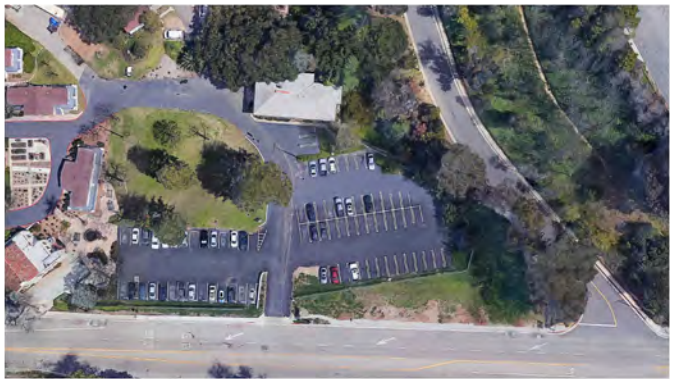

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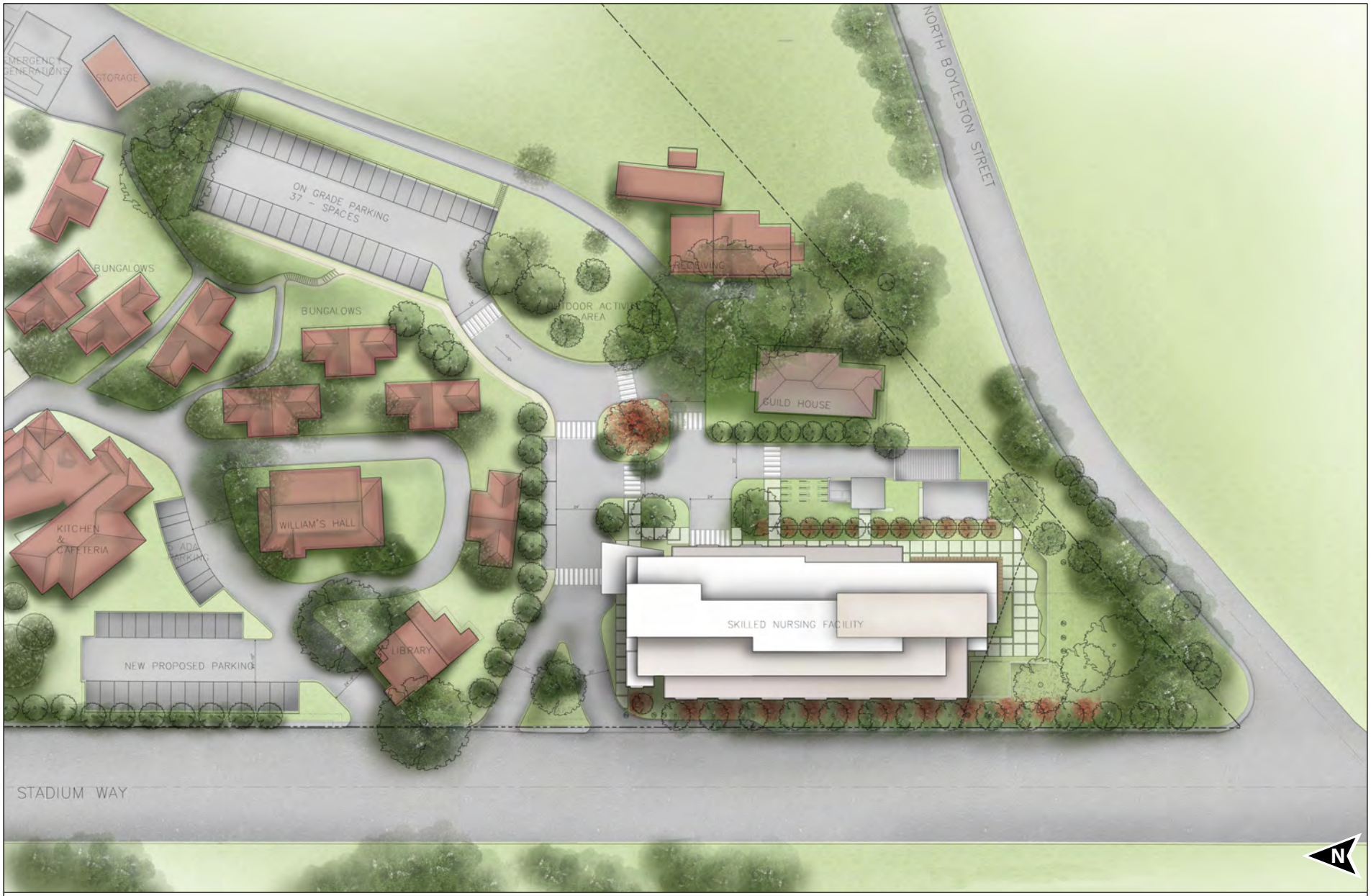
Source: Zakian Woo Architects, 2022

Figure 3-3
Project Site Photos

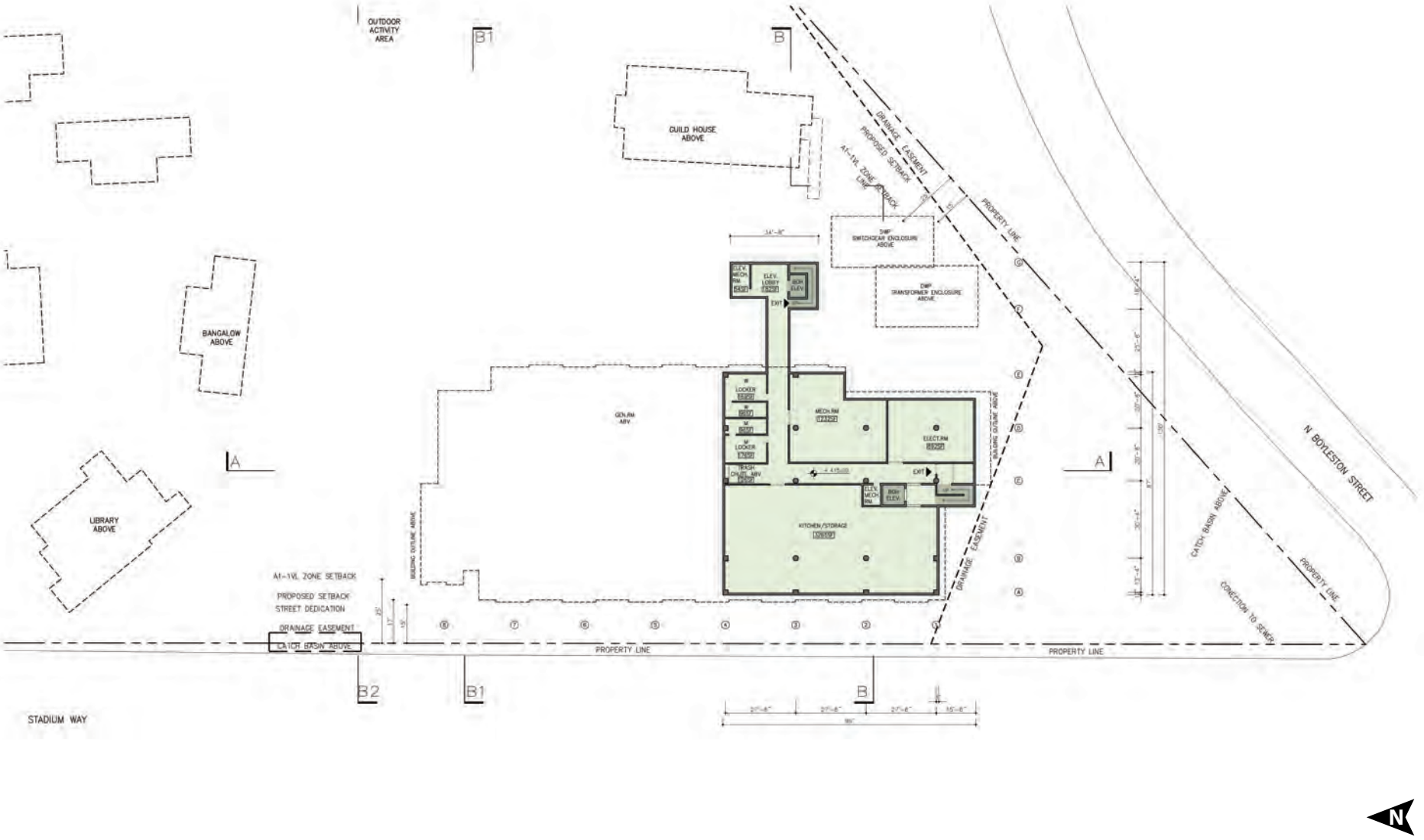
Source: Zakian Woo Architects, 2022

Figure 3-4
Proposed Site Plan



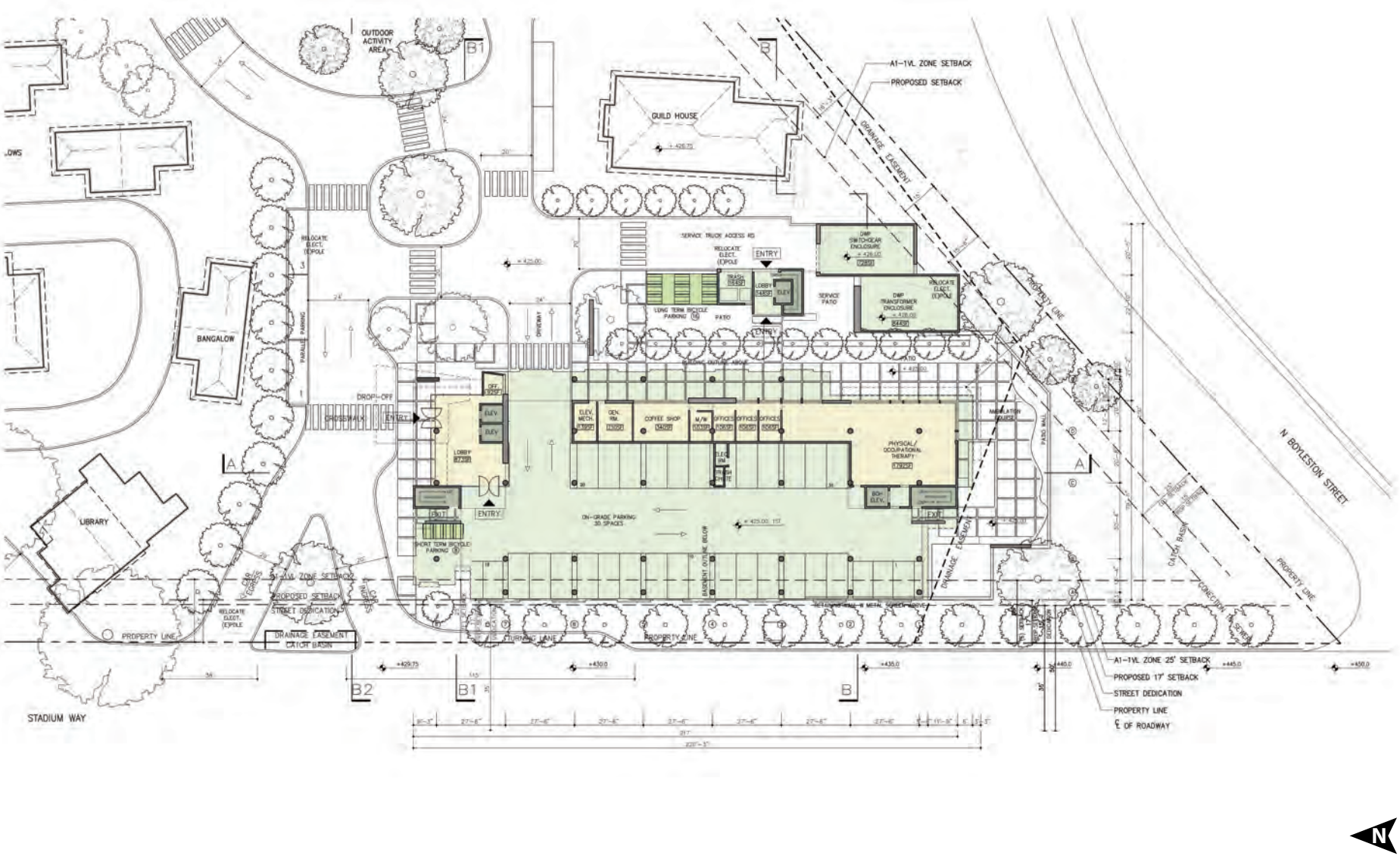
Source: Zakian Woo Architects, 2022

Figure 3-5
Enlarged Proposed Site Plan



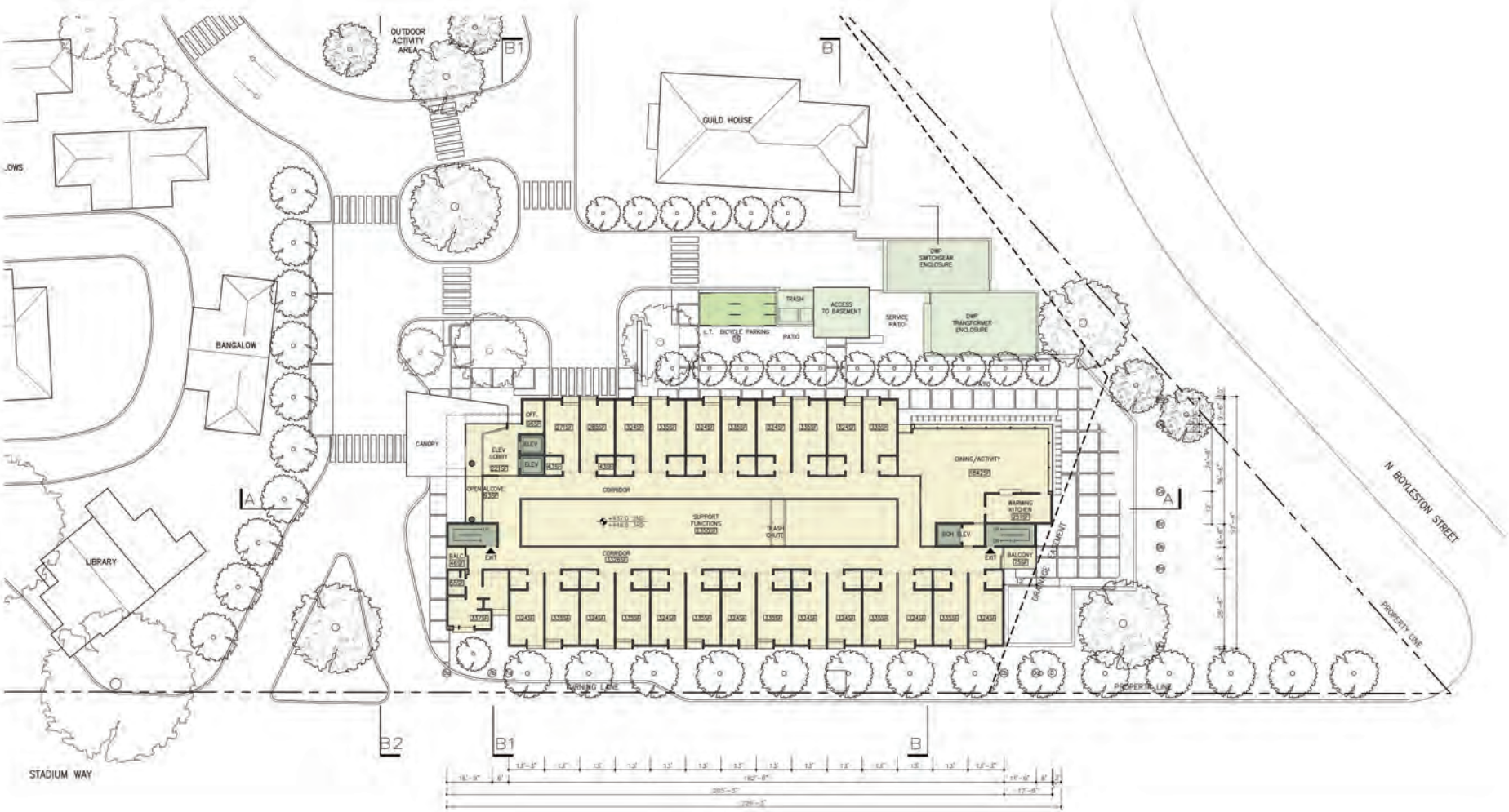
Source: Zakian Woo Architects, 2022

Figure 3-6
Basement Floor Plan



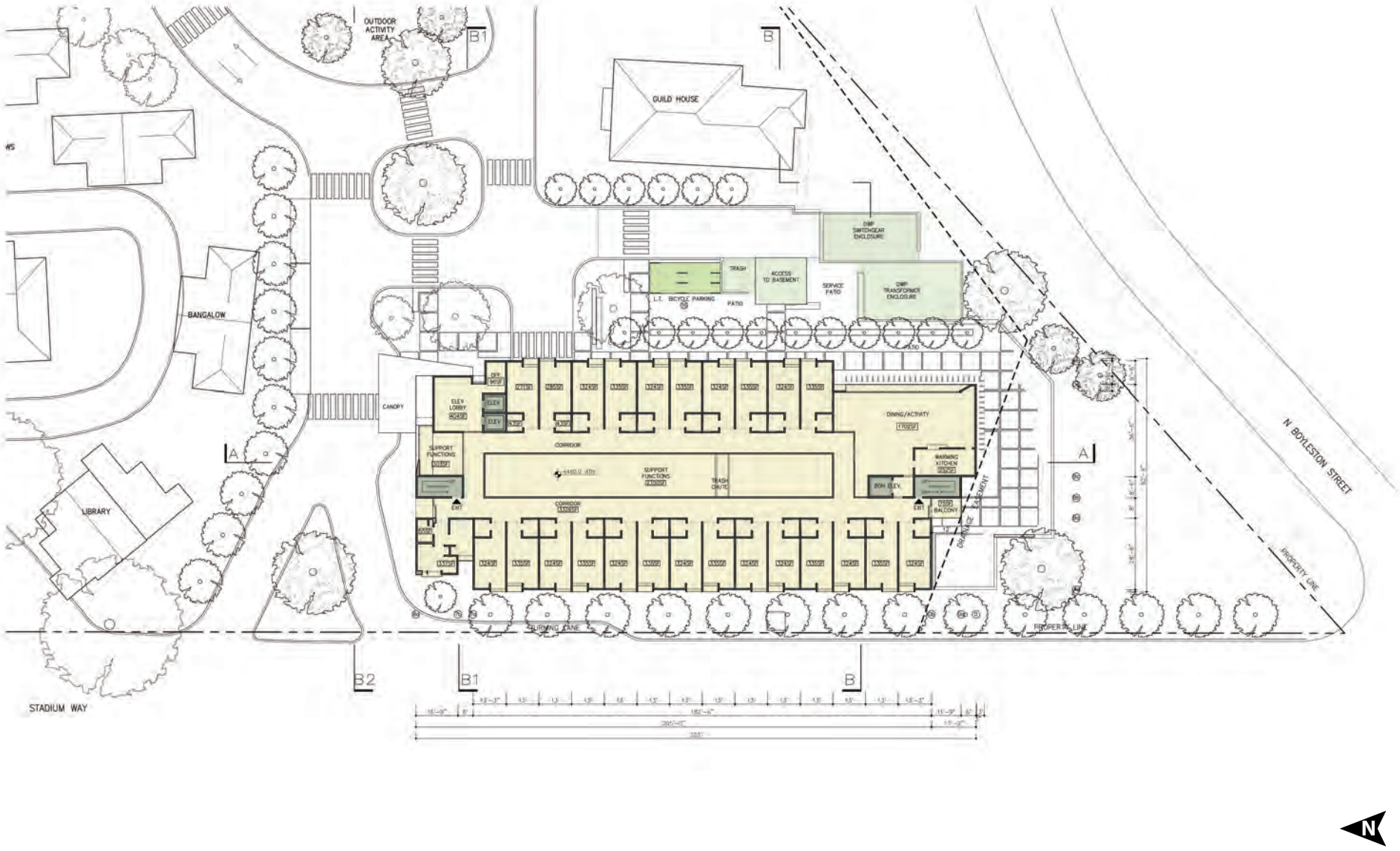
Source: Zakian Woo Architects, 2022

Figure 3-7
1st Floor Plan



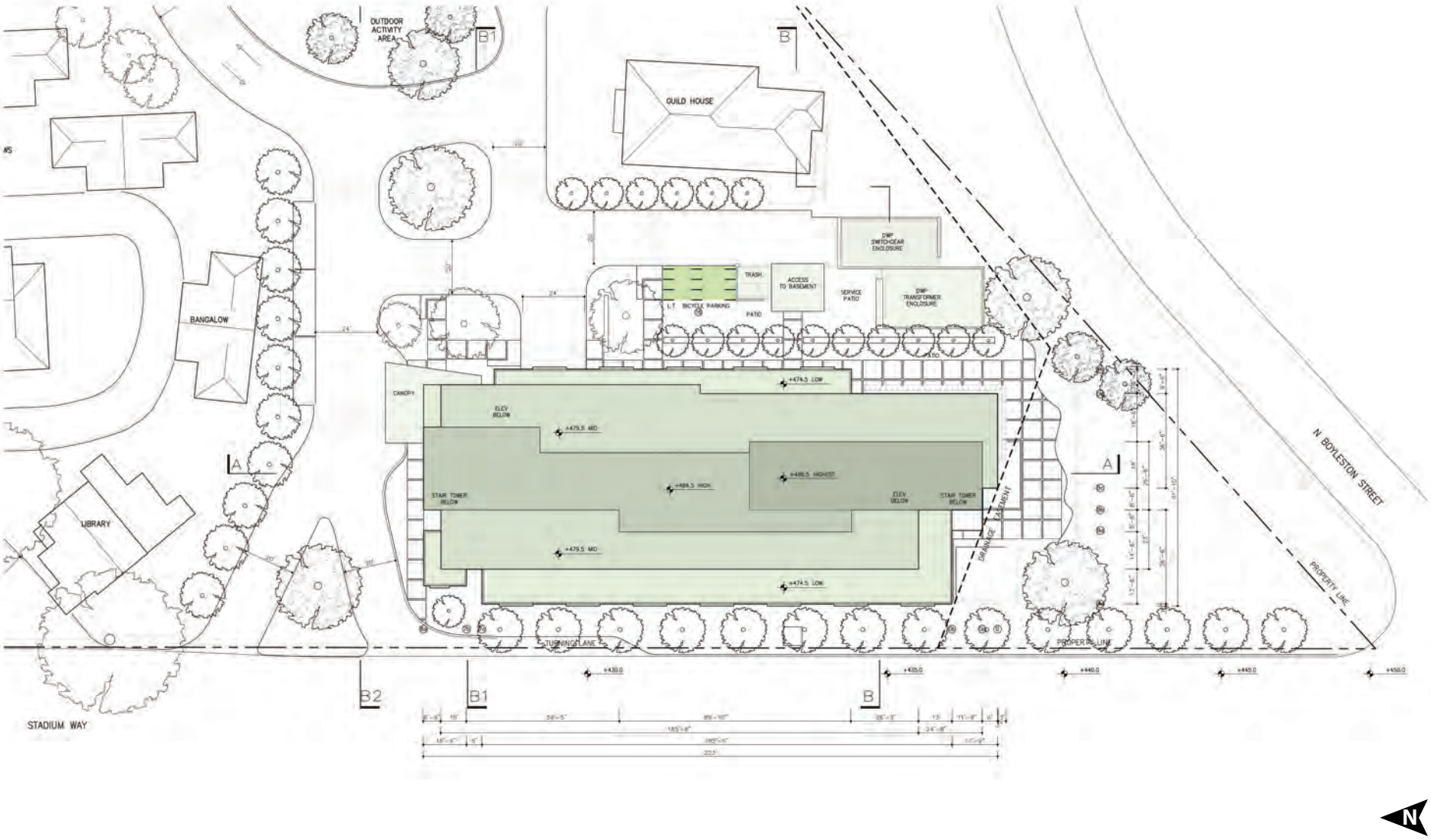
Source: Zakian Woo Architects, 2022

Figure 3-8
2nd and 3rd Floor Plan



Source: Zakian Woo Architects, 2022

Figure 3-9
4th Floor Plan



Source: Zakian Woo Architects, 2022

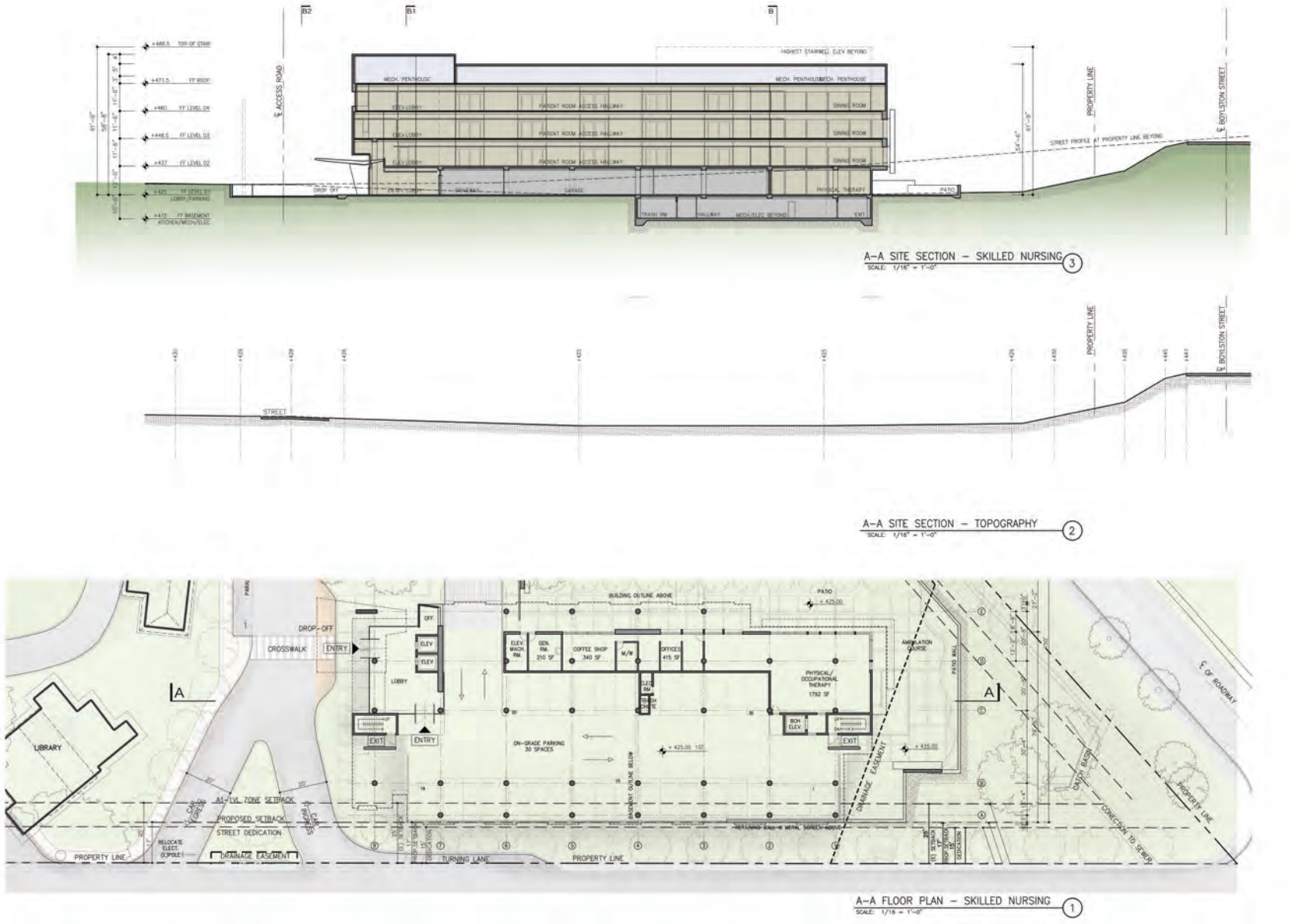
Figure 3-10
Roof Plan

Source: Zakian Woo Architects, 2022

Figure 3-11
North and East Elevations

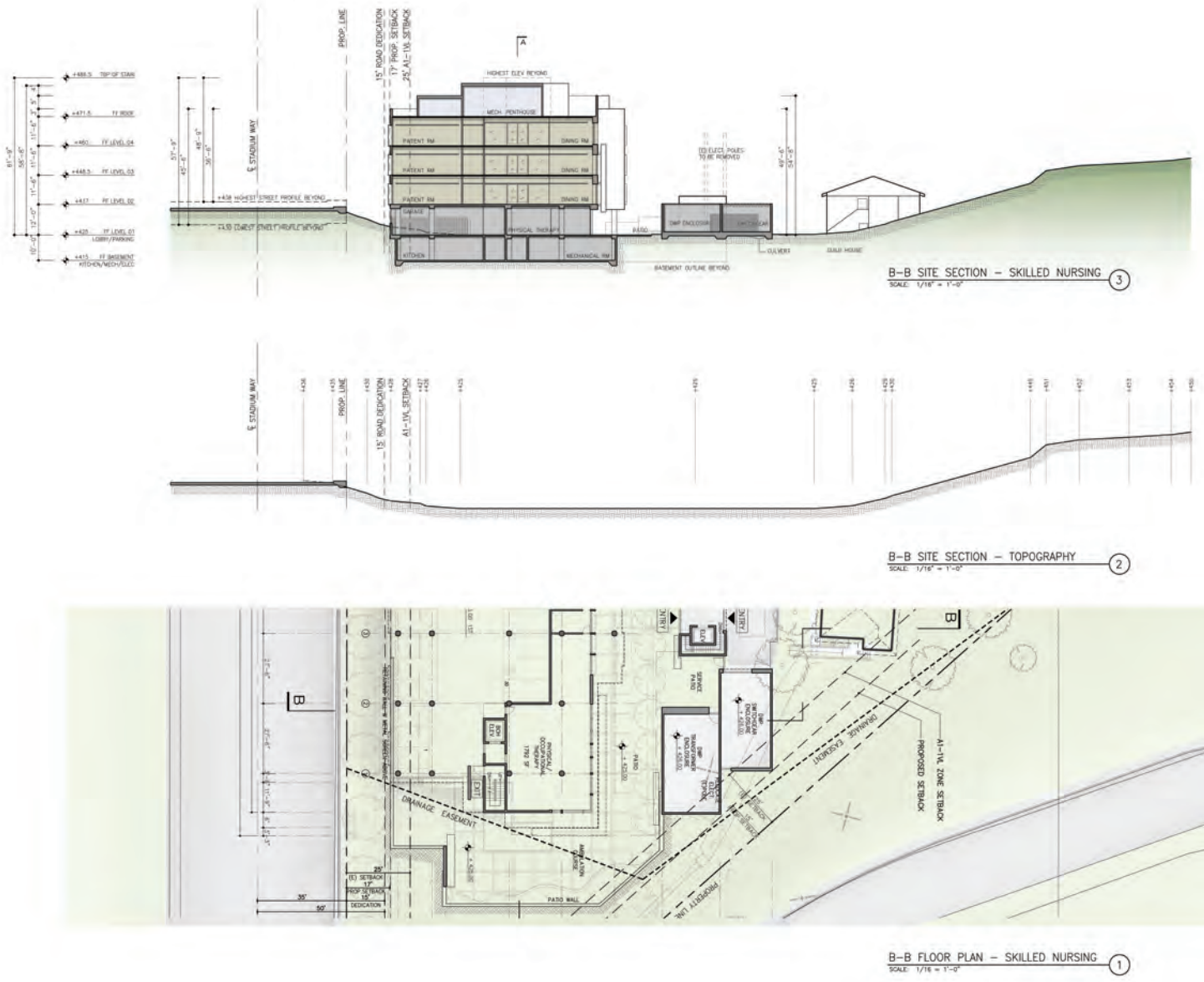
Source: Zakian Woo Architects, 2022

Figure 3-12
South and West Elevations



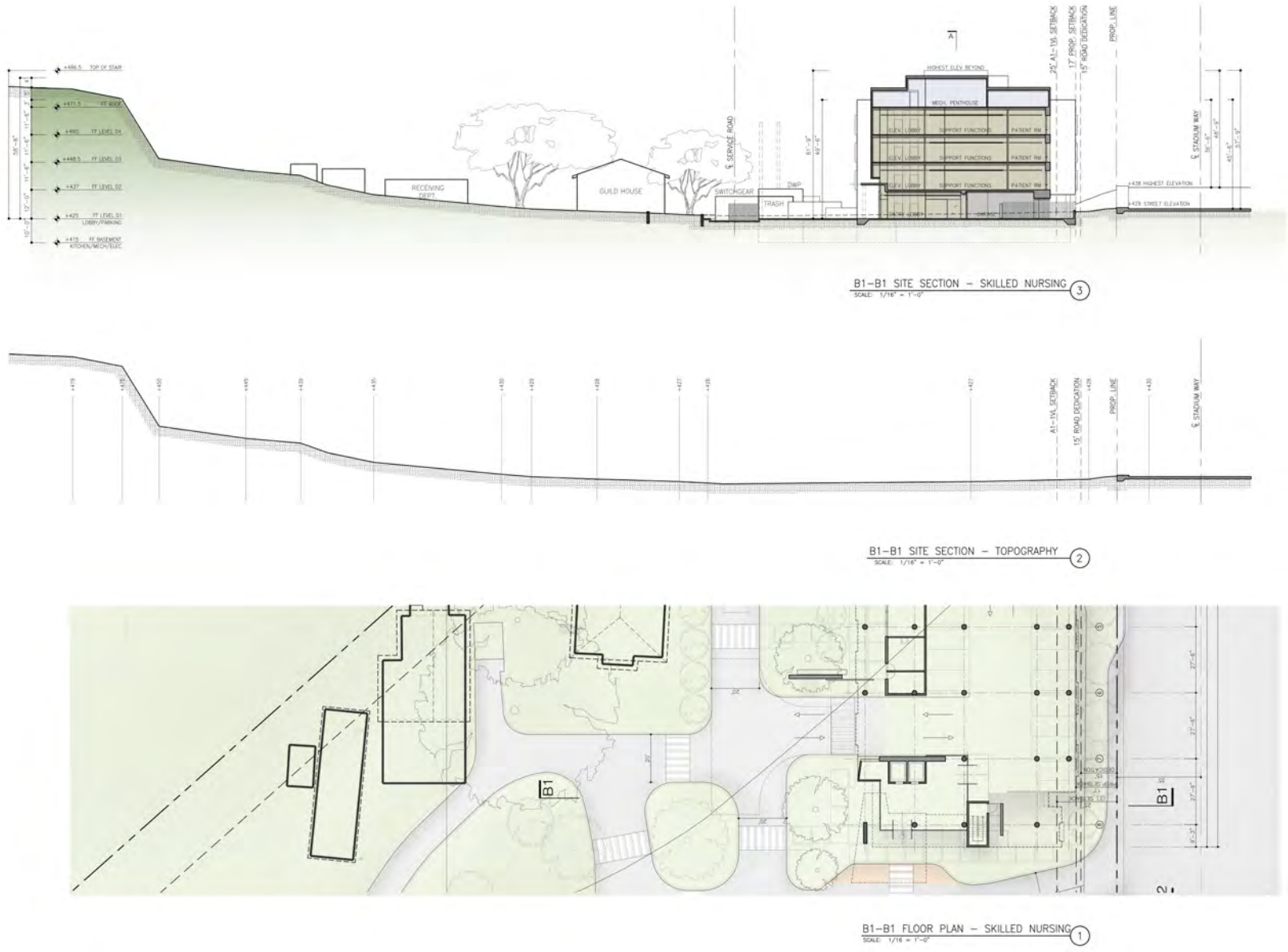
Source: Zakian Woo Architects, 2022

Figure 3-13
Cross Section A



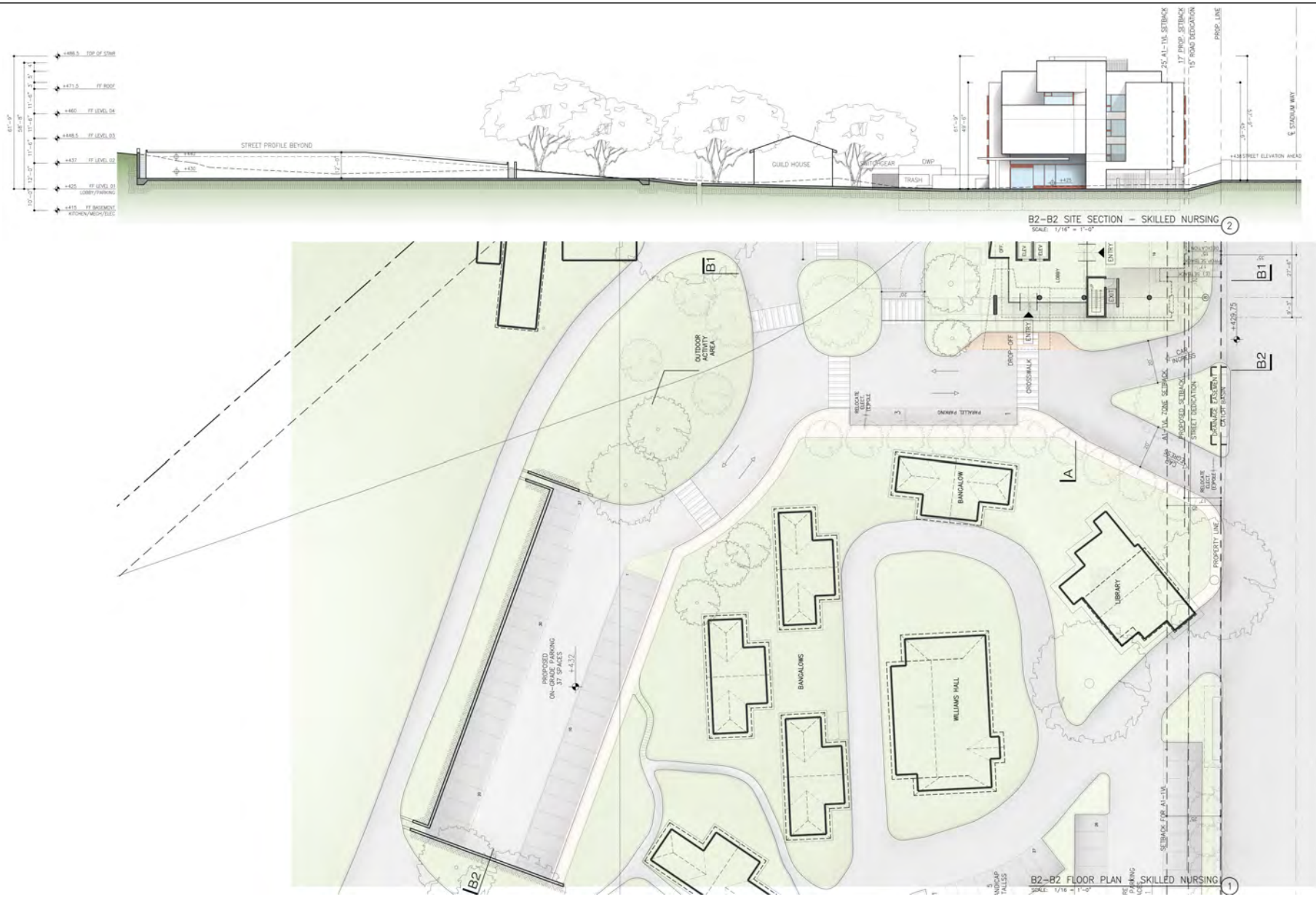
Source: Zakian Woo Architects, 2022

Figure 3-14
Cross Section B



Source: Zakian Woo Architects, 2022

Figure 3-15
Cross Section B1



Source: Zakian Woo Architects, 2022

Figure 3-16
Cross Section B2

NORTHEAST 5

SOUTHWEST 4

SOUTH 3

EAST (SOUTH) 2

NORTHEAST 1

Source: Zakian Woo Architects, 2022

Figure 3-17
Renderings 1

NORTHWEST 5

SOUTHEAST 4

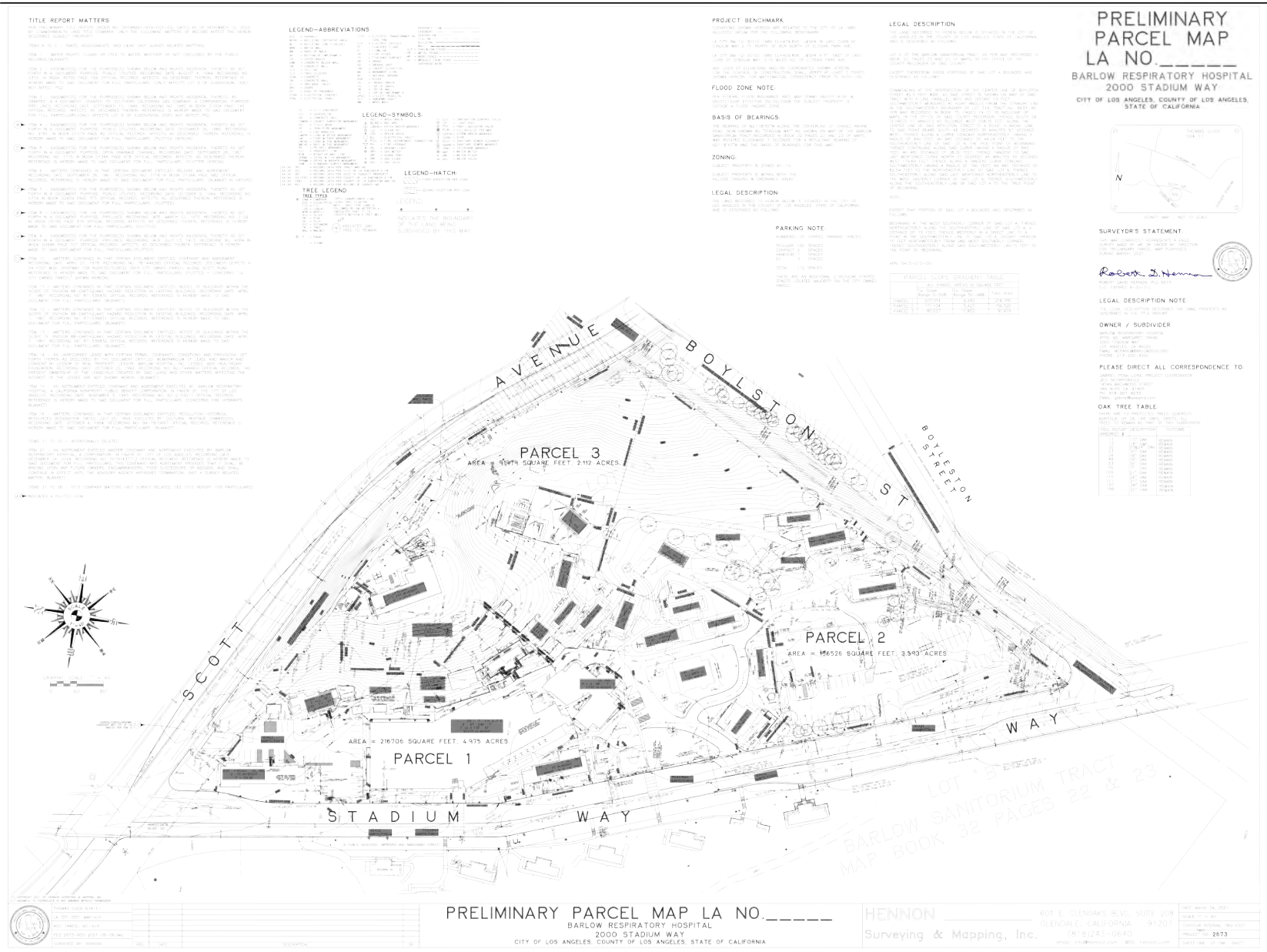
3 NORTH

2 EAST (NORTH)

NORTHWEST 1

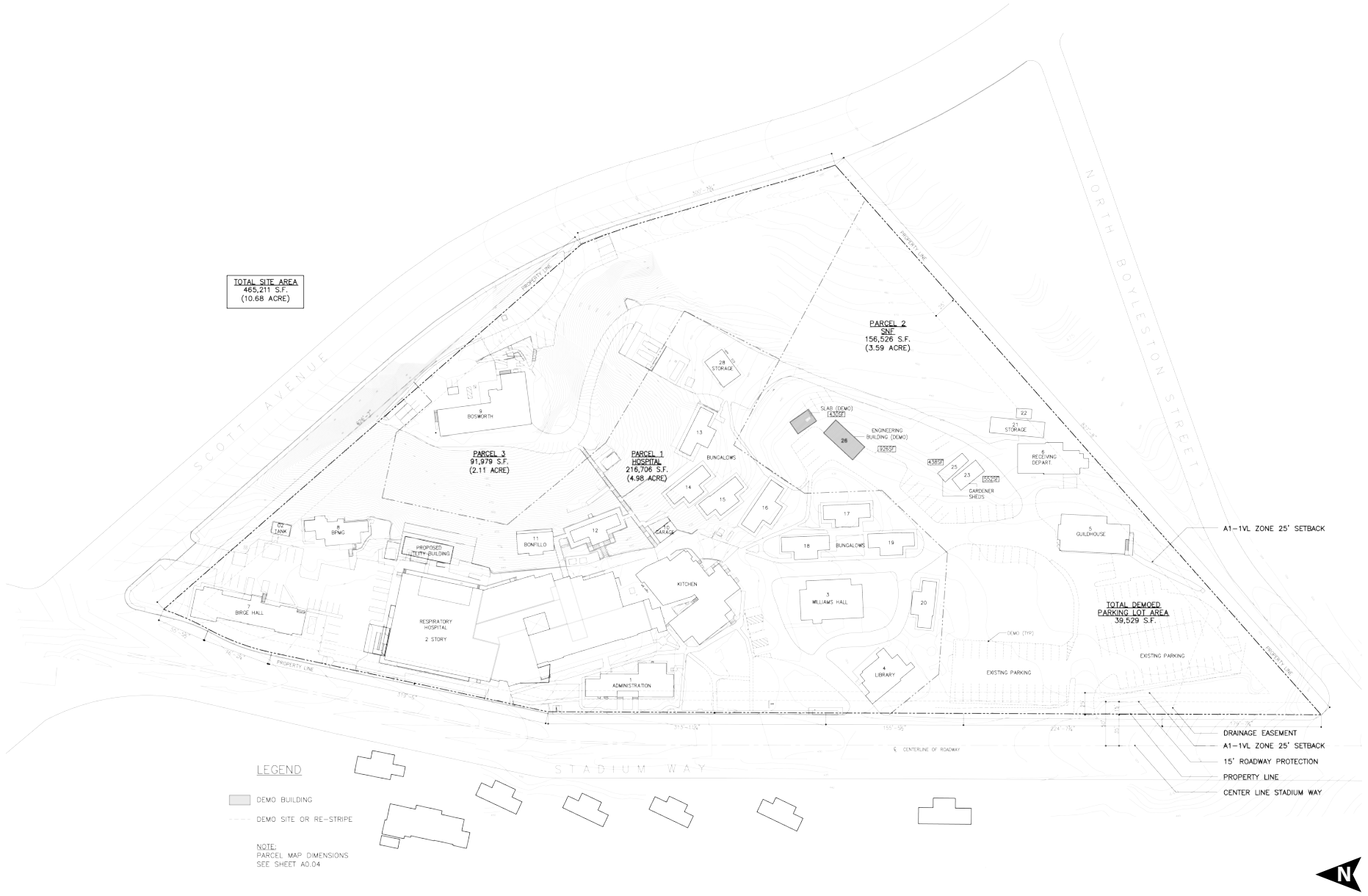
Source: Zakian Woo Architects, 2022

Figure 3-18
Renderings 2



Source: Hennon Surveying & Mapping, Inc., 2021

Figure 3-19
Preliminary Parcel Map



Source: Zakian Woo Architects, 2022

Figure 3-20
Site Demolition Plan

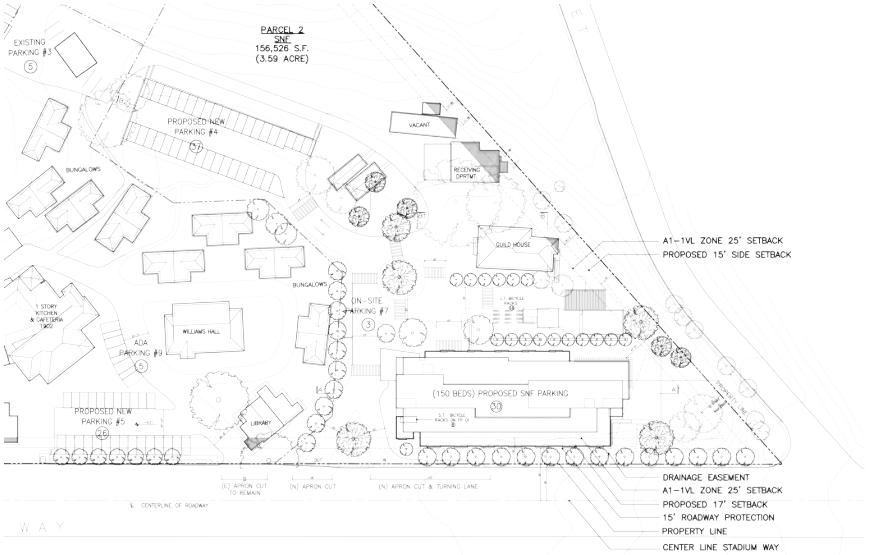
Source: Zakian Woo Architects, 2022

Figure 3-21
Existing and Proposed Planting Schedule

SERVICE FACILITIES

VEHICLE
PUBLIC/ STAFF CIRCULATION

PEDESTRIAN CIRCULATION



STREET PLAN

Source: Zakian Woo Architects, 2022

Figure 3-22
Access, Circulation, and Street Plan

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In 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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

No Impact. The Project Site is currently improved with a surface parking lot. The parking lot would be removed and replaced with the SNF building and other on-grade improvements, including construction of new and re-striping of existing parking lots and areas. The Project Site is located within a designated hillside area, however, the portions of the Project Site proposed for development under the Project have previously been graded and developed with parking lots and small structures, and the proposed Project activities would not alter the existing landform outside of these areas. Angel's Point, a vista point within Elysian Park, is located approximately 0.5-mile northeast of the location of the proposed SNF building. Angel's Point provides panoramic views of the Downtown Los Angeles skyline. The SNF building would not interfere with such views and would represent an insignificant portion of the Angel's Point viewshed. As such, the Project would not have a substantial adverse effect on a scenic vista. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. Within the Silver Lake—Echo Park—Elysian Valley Community Plan Area, SR 110 is a designated scenic highway. However, the Project Site is not located along SR 110. The Project Site is currently improved with a surface parking lot. In addition, due to intervening topography and vegetation, the Project Site is not viewable from SR 110. As such, the Project would not substantially damage scenic resources within a State scenic highway. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is located in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

Zoning Consistency

The Project Site is zoned A1-1VL (Agriculture in Height District 1VL). The BRH was first established as a sanatorium for tuberculosis patients in or about 1901. At such time, the City had not yet adopted a Citywide zoning ordinance to regulate the use and development of properties in the City. The City's zoning ordinance was subsequently adopted in 1921, which did not provide for the use of the Property as a hospital. Accordingly, in 1937, the City adopted Ordinance No. 78709 to allow Barlow to make necessary alterations, additions, and repairs and erect new hospital buildings in the (then) R1 Zone subject to the approval of plans. In accordance with Ordinance No. 78709, the City has since considered Barlow to be a "deemed-approved conditional use" under the jurisdiction of the Zoning Administrator. Barlow Hospital is also the subject of an existing ongoing "blanket variance." The ongoing variance was authorized in Ordinance 78709, as well as City Planning Cases 5421 and 5422 which authorized a "blanket variance…or the erection of such buildings as may be needed" (and which was used to approve hospital improvement plans in 1947, 1948, 1949, and 1961). The City has more recently acknowledged the ongoing variance in ZA 1993-0922, and again in its November 27, 2019 plan approval (ZA-1993-0922-CUZ-PA1; acknowledging a blanket variance for Barlow, which is currently administered as a "deemed approved conditional use" under LAMC Section 12.24F and 12.24M). As discussed in detail in response to **Checklist Section XI, Land Use**, following plan approval under the Project Site's existing CUP, the Project would be consistent with the zoning

for the Project Site, including the land use, FAR, height, and setback requirements, standards, and limits established in the LAMC for the A1-1VL zone.

Other Scenic Quality Regulations

Community Plan

The Project Site is located within the boundaries of the Silver Lake—Echo Park—Elysian Valley Community Plan. The Silver Lake—Echo Park—Elysian Valley Community Plan is one of the community plans that makes up the Land Use Element of the City of Los Angeles' General Plan. The community plans promote an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work, and invest in the community. The Silver Lake—Echo Park—Elysian Valley Community Plan Therefore, impacts related to conflicts with the Silver Lake—Echo Park—Elysian Valley Community Plan would be less than significant and no mitigation measures would be required.

Summary

Based on the above, the Project would be consistent with the zoning for the Project Site and the regulations of the Silver Lake—Echo Park—Elysian Valley Community Plan. As such, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact.

Light

The Project Site is currently a surface parking lot which is illuminated at night within the BRH campus. The Project Site is also located in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows), as well as Dodger Stadium and associated parking lots to the southeast. Nighttime security lighting for the Project would be provided to illuminate building entrances, parking areas, and internal roadways and walkways. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels. The nearest sensitive receptors in the vicinity of the Project Site are the single-family residences along Boylston Street to the northeast. However, shortest distance between the residences and any proposed source of new lighting (the proposed new parking lot in the central portion of the Project Site) would be 500 feet and there is no line of sight between the Project and such homes. Furthermore, these residences are located approximately 200 feet west of, and slightly higher than, the nearest Dodger Stadium parking lots and these residences currently experience moderate to high light levels during game and event nights. Because of distance, topography, and (on game and event nights) already high ambient light levels, Project light sources would not substantially increase ambient illumination levels in this residential neighborhood through light

spillover or sky glow or increase light levels. The Project's compliance with the City's lighting regulations, including LAMC Sections 12.21 A.5(k) and 93.0117, would also require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, or from above so as to minimize light trespass. As such, the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant and no mitigation measures would be required.

Glare

The Project Site is currently a surface parking lot which is illuminated at night within the BRH campus. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of the proposed building would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The proposed on-grade parking would be screened with landscaping, thereby minimizing potential nighttime glare from vehicles. As such, the Project would not create a new source of substantial glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. According to surveys conducted pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, the Site and surrounding area are considered urban and built up land and other land outside of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land (Farmland).[2] Therefore, the Project would not convert existing Farmland to non-agricultural use. Accordingly, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is not under a Williamson Act contract. The Project Site is zoned A1-1VL (Agriculture in Height District 1VL). However, there are no agricultural uses currently occurring at the Project Site or within the surrounding area. The Project Site has operated as a medical campus since its initial development in 1901 and currently operates under a Conditional Use Permit (CUP) which anticipates continuation and expansion of the current hospital use. The Project would be constructed and operated under the existing CUP and would not conflict with the existing agricultural zoning. Accordingly, impacts related to

[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, California Important Farmland Finder Interactive Map, available at: https://maps.conservation.ca.gov/DLRP/CIFF/, d September 21, 2021.*

conflicts with agricultural zoning and Williamson Act contracts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space) and no forest land exists on the Site. The City does not have specific zoning for timberland or timberland production, however, the Project Site is currently developed with medical institutional uses and does not include timberland or timberland production uses. Accordingly, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. No forest land exists at the Project Site. In addition, the surrounding vicinity is developed with residential, park and open space, and sports venue uses in a developed area of the City. Accordingly, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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 urban area of the City developed with medical campus uses and on-grade parking. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The Project would add facilities to the existing medical campus and parking uses at the Project Site consistent with the existing CUP for the Project Site. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or offsite. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

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

The following analysis of the potential air quality impacts of the Project is based, in part, on emissions modeling prepared for the Project using the California Emissions Estimator Modeling software (CalEEMod) prepared for the Project. The CalEEMod outputs are included as **Appendix A** to this IS/MND.

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

Less than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the National Ambient Air Quality Standard (NAAQS) (e.g., ozone, particulate matter ($PM_{2.5}$), and PM_{10}). The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from Southern California Association of Governments' (SCAG's) 2016 and 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) designed to focus growth near High Quality Transit Areas (HQTAs) and to reduce vehicle miles traveled (VMT).

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. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the

federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. 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, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The California Air Resources Board (CARB) is the lead agency for climate change programs and oversees all air pollution control efforts in California to attain and maintain health-based air quality standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG. As the AQMP control strategy is based on projections from local General Plans, projects which are consistent with local General Plans are considered consistent with the growth assumptions of the air quality related regional plans and their emissions are assumed to be accounted for in the AQMP emissions inventory. Projects which include amendments to General or Specific Plans, or are considered significant projects, undergo further scrutiny for AQMP consistency. As noted above, the 2016 AQMP has been adopted by the SCAQMD and CARB. Therefore, this analysis considers the Project's consistency with the 2016 AQMP.

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's *CEQA Air Quality Handbook,*[3] the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

[3] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.*

The Project's impacts with respect to these criteria are discussed to assess the consistency with SCAQMD's AQMP.

Consistency Criterion No. 1: The 2016 AQMP, discussed previously, was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment of the AQMP's goals. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards ("CAAQS") and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds ("LSTs") or regional significance thresholds were exceeded. The Project would not exceed the applicable LSTs or regional significance thresholds for construction activity (see discussion below under Questions 3(b), 3(c), and 3(d)). Therefore, the Project would not conflict with the AQMP according to this criterion.

Operational Impacts

The Project would not exceed the applicable LST or regional significance thresholds for operational activity (see discussion below under Questions 3(b), 3(c), and 3(d)). Therefore, the Project would not conflict with the AQMP according to this criterion.

On the basis of the preceding discussion, the Project is consistent with the first criterion.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Overview

Consistency with the AQMP assumptions is determined by performing an analysis of the Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Project are based on the same forecasts as the AQMP. The 2016-2040 RTP/SCS includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA.

On September 1, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and

bolster Southern California long-term economic viability.[4] The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these criteria.

As discussed in Section XIV, Population and Housing, the proposed Project would not exceed the population and housing projections of the 2020-2045 RTP/SCS for the Los Angeles subregion, and would therefore be consistent with the assumptions utilized in preparing the AQMP.

Regarding feasible air quality mitigation measures, the proposed Project does not have significant impacts that require mitigation as shown in **Appendix A**. Additionally, the proposed Project would comply with applicable regulatory measures enforced by the SCAQMD. SCAQMD enforces stationary and mobile source compliance with respect to both operational and construction emissions. The proposed Project would adhere to current and applicable regulatory compliance measures (including SCAQMD Rule 403: Fugitive Dust and Rule 1113: Architectural Coating). As such, the proposed Project is consistent with this criterion. No mitigation measures are required to meet SCAQMD air quality thresholds.

With respect to land use policies set forth in the AQMP, the proposed Project would implement several land use policies and strategies listed in the RTP/SCS and the AQMP. Such land use strategies set forth in the 2016 AQMP that are applicable to the proposed Project include planning for growth around livable corridors, providing more options for short trips/neighborhood mobility areas, expanding electric vehicle charging stations, supporting local sustainability planning, and balancing growth distribution between 500-foot buffer areas and HQTAs. The Project would expand the existing BRH campus through the construction of a new skilled nursing facility in the southern portion of the existing campus. The Project would increase the diversity of uses by providing skilled nursing facilities in the immediate area. The Project proposes to construct an onsite SNF in order to enable patients to continue recovery without leaving the campus where they can be continuously monitored by physicians, which would help reduce vehicle miles traveled by promoting internal capture trips. The BRH has continuously served the community since 1901 and operates as a deemed-approved conditional use pursuant to Ordinance No. 78709 and City Planning Cases 5421 and 5422, which allow Barlow to make necessary alterations, additions, and repairs and erect new hospital buildings, such as the proposed SNF. Following plan approval pursuant to LAMC Sections 12.24.M and 12.24.F, the Project would be consistent with the Project Site zoning under the CUP.

The Project Site is located within the boundaries of the Silver Lake–Echo Park–Elysian Valley Community Plan in a developed area of the City, and is currently improved with the BRH campus. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. The BRH is accessible from Sunset Boulevard, which is a major transportation corridor, and close to several freeways. Public transit is available in the surrounding vicinity. In

[4] *Southern California Association of Governments, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. As such, the Project is an appropriate location for the proposed use and would serve the local community's demand for a skilled nursing facility. Thus, the proposed Project would be compatible with the existing established land uses in the Project area. The proposed Project SNF use would generate an increase of approximately 60 employees on the Project Site. The Project's estimated employment growth projections would not conflict with SCAG's future growth projections for the City of Los Angeles. The Project Site is currently developed with the BRH complex and does not include residential units; thus, the Project would not result in the displacement of housing.

Sustainability features of the proposed Project include development of a skilled nursing facility that will meet or exceed California's Building Energy Efficiency Standards (Title 24) and use high efficiency HVAC systems. The proposed Project would be designed to meet the minimum energy efficiency standards of the Los Angeles Green Building Code.

In addition, regarding land use developments, such as the proposed Project, SCAG's 2016/2020 RTP/SCS land use goals and policies focus on the reduction of vehicle trips and VMT. Per the City's Traffic Assessment Guidelines (TAG), projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and greenhouse gases (GHG) goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2016/2020 RTP/SCS and would have a less-than-significant cumulative impact on VMT. As the Project would generate a total of 399 daily trips and can be sufficiently mitigated through TDM measures, the Project would not result in any significant VMT transportation impacts as shown in Appendix I. Furthermore, as the Project proposes a 150-patient bed skilled nursing facility, the Project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206(b)(2)(D); therefore, no further analysis of SCAG consistency is required and the Project is consistent with the RTP/SCS.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the proposed Project on air quality in the Air Basin. The proposed Project is an infill development near transit within an existing urbanized area that would provide a skilled nursing facility within a Transit Priority Area (TPA), thus reducing VMT. The proposed Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. As discussed above, the proposed Project would be consistent with the growth assumptions, goals, and policies of the AQMP and, therefore, would not conflict with or obstruct implementation of the SCAQMD's AQMP. This impact would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

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

Less than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants.

The Project has been evaluated to determine if it will violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it will result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin ("SCAB") is non-attainment under an applicable federal or state ambient air quality standard. The significance of these potential impacts is described below.

Standards of Significance

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in **Table III-1, SCAQMD Air Quality Significance Thresholds**. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. It should be noted that the SCAQMD provides a threshold for emissions of lead, however for purposes of this analysis no lead emissions are calculated as there are no substantive sources of lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

Table III-1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC [b]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO_2eq for industrial facilities	
Toxic Air Contaminants and Odor Thresholds		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	10.4 µg/m^3 (construction) [d] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation)	

Table III-1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]	
Sulfate 24-hour average	25 µg/m^3 (state)
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Source: SCAQMD CEQA Handbook (SCAQMD, 1993).*

[b] *The definition of volatile organic compounds (VOC) includes reactive organic gas (ROG) compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.*

[c] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.*

[d] *Ambient air quality threshold based on SCAQMD Rule 403.*

Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: March 2022.

Construction Emissions

Emissions are estimated using the California Emissions Estimator Model (CalEEMod) (Version 2020.4.0) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. CalEEMod is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[5]

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The program uses the Emission Factor (EMFAC2017) computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2017 and Off Road (OFFROAD2011) are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of Project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and

[5] *South Coast Air Quality Management District, California Emissions Estimator Model, http://www.aqmd.gov/caleemod/.*

emission calculations are available in the CalEEMod Output provided in **Appendix A** of this Initial Study document.

Construction activities associated with the Project will result in emissions of VOCs, nitrogen oxide (NO_X), sulfur oxide (SO_X), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Demolition
- Grading/Excavation
- Building Construction
- Architectural Coating
- Paving

Construction is expected to start no sooner than late November 2022 and take approximately 14 months. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[6] The construction activities for the Project are anticipated to include: demolition of an existing 20,000 square-foot (SF) surface parking lot, 430 SF concrete slab, and existing approximately 926 SF maintenance shed, grading/excavation, construction of an approximately 80,454 SF, 75 room, 150 bed skilled nursing facility, application of architectural coatings, and paving of a 165-space parking lot.

Dust is typically a major concern during demolition and excavation/grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (approximately 10.68 acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures is used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance

[6] *As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version 2020.4.0, Section 4.3.2 "Off-Road Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.*

with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur and is incorporated into the emissions modeling for the Project.

Construction emissions for construction worker vehicles traveling to and from the Project Site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 have been taken.

The estimated maximum daily construction emissions are summarized in **Table III-2, Construction-Related Regional Pollutant Emissions**. Detailed construction model outputs are presented in **Appendix A** to this document.

Table III-2
Construction-Related Regional Pollutant Emissions

Activity		Pollutant Emissions (pounds/day)					
		ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition	On-Site [a]	2.64	25.72	20.59	0.04	1.30	1.16
	Off-Site [b]	0.06	0.33	0.66	0.00	0.20	0.06
	Subtotal	2.70	26.05	21.26	0.04	1.51	1.22
Grading/ Excavation	On-Site [a]	3.62	38.84	29.04	0.06	5.23	2.93
	Off-Site [b]	0.15	3.20	1.44	0.01	0.58	0.17
	Subtotal	3.78	42.04	30.48	0.08	5.81	3.10
Building Construction	On-Site [a]	1.30	11.58	15.73	0.02	0.57	0.54
	Off-Site [b]	0.30	0.97	3.25	0.01	1.05	0.29
	Subtotal	1.60	12.55	18.98	0.04	1.62	0.83
Architectural Coating	On-Site [a]	26.31	1.83	2.90	0.00	0.08	0.08
	Off-Site [b]	0.06	0.04	0.58	0.00	0.18	0.05
	Subtotal	26.37	1.87	3.48	0.01	0.26	0.13
Paving	On-Site [a]	1.23	10.19	14.58	0.02	0.51	0.47
	Off-Site [b]	0.05	0.04	0.54	0.00	0.17	0.05
	Subtotal	1.28	10.23	15.13	0.02	0.68	0.51
Total for overlapping phases [c]		29.25	24.65	37.59	0.07	2.56	1.47
Maximum Daily Emissions		**29.25**	**42.04**	**37.59**	**0.08**	**5.81**	**3.10**
SCAQMD Thresholds		75	100	550	150	150	55
Exceeds Thresholds?		**No**	**No**	**No**	**No**	**No**	**No**

[a] *On-site emissions from equipment operated on-site that is not operated on public roads. On-site grading and site preparation PM_{-10} and $PM_{-2.5}$ emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.*
[b] *Off-site emissions from equipment operated on public roads.*
[c] *Construction, paving, and painting phases may overlap.*
*Source: CalEEMod Version 2020.4.0. Output, available in **Appendix A**.*
Note: Totals may not sum due to rounding.

As shown in **Table III-2**, emissions resulting from the Project construction would not exceed regional criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source regional emissions and no mitigation measures are required.

Operational Emissions

Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. Rule 1113 (Architectural Coatings) limits paints applied to buildings to 50g/L VOC content.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Fireplaces

The Project is not proposing to install any fireplaces and therefore would not result in any emissions associated with hearths/fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. Please see Section VI Energy for additional details on energy use.

Mobile Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project.

On July 30, 2019, the City of Los Angeles updated its travel demand model, impact evaluation methodology, and transportation impact thresholds based on vehicle miles traveled (VMT). In accordance with the new CEQA Section 15064.3, although the City considers the Level of Service (LOS) which measures vehicle delay during the Site Plan Review process, the Significance of Transportation Impacts for the purposes of CEQA are now determined using the VMT metric.

CalEEMod uses trip generation rates to determine mobile source emissions from Project-generated vehicle trips. Therefore, the weekday VMT trip rates from the traffic analysis (Transportation Assessment)[7] were used to analyze the mobile source emissions from the Project and the trip generation rate of 6.12 trips/room (DU) were used as the basis for the calculation of weekend (Saturday and Sunday) trips. The Transportation Assessment showed that the Project would generate 399 daily weekday vehicle trips (with incorporation of TDM strategies which are required to meet the VMT significance threshold). The CalEEMod program then applies the emission factors for each trip, which is provided by the EMFAC2017 model, to determine the vehicular traffic pollutant emissions.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts. The worst-case summer or winter criteria pollutant emissions created from the Project's long-term operations have been calculated and are shown below in **Table III-3, Regional Operational Pollutant Emissions.**

The results from **Table III-3** show that none of the SCAQMD regional thresholds would be exceeded. Thus, a less than significant impact would occur for Project-related operational-source regional emissions and no mitigation measures are required.

Therefore, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, thus, would be less than significant. No mitigation measures are required.

[7] *Overland Traffic Consultants, Inc. Transportation Assessment for Barlow Respiratory Hospital Skilled Nursing Facility, January 2022.*

Table III-3
Regional Operational Pollutant Emissions

Operational Activities	Pollutant Emissions (pounds/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Area Sources [a]	1.95	0.07	6.20	0.00	0.03	0.03
Energy Usage [b]	0.03	0.26	0.11	0.00	0.02	0.02
Mobile Sources [c]	2.48	2.65	24.67	0.05	5.71	1.55
Total Emissions	**4.45**	**2.98**	**30.98**	**0.06**	**5.76**	**1.60**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

a Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
b Energy usage consists of emissions from generation of electricity and on-site natural gas usage.
c Mobile sources consist of emissions from vehicles and road dust.
*Source: CalEEMod Version 2020.4.0; the higher of either summer or winter emissions for the Project, available in **Appendix A**.*

Mitigation Measures

None required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors;" they are also known to be locations where an individual can remain for 24 hours.

The land uses within the general vicinity consist of Elysian Park and Montecillo de Leo Politi Picnic Area to the north across Scott Avenue; single-family residences to the northeast along Boylston Street; Dodger Stadium and associated surface parking lots to the east across Boylston Street; single-family residences to the south along Vin Scully Avenue, with single-family and multi-family uses further west across Elysian Park Drive.

Construction

Localized Significance – Construction

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds ("LSTs").

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they

increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM_{10}, and $PM_{2.5}$ from the Project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Central Los Angeles source receptor area (SRA) 1 and a screening disturbance value of five acres per day (as the Project Site is approximately 10.68 acres).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest off-site sensitive receptors to the Project Site include: the residential uses located approximately 390 feet to the west, east of Elysian Park Drive, and the residential uses located approximately 345 feet to the east, south of N. Boylston Street; therefore, the 100-meter threshold was used. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts. **Table III-4, Local Construction Emissions at the Nearest Receptors**, shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

Table III-4
Local Construction Emissions at the Nearest Receptors

	On-Site Pollutant Emissions (pounds/day)			
Activity	**NO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Demolition	25.72	20.59	1.30	1.16
Grading/Excavation	38.84	29.04	5.23	2.93
Building Construction	11.58	15.73	0.57	0.54
Architectural Coating	1.83	2.90	0.08	0.08
Paving	10.19	14.58	0.51	0.47
SCAQMD Thresholds [a]	**165**	**3,030**	**69**	**18**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *The nearest sensitive receptors to the Project Site include: the residential uses located approximately 390 feet to the west, east of Elysian Park Drive, and the residential uses located approximately 345 feet to the east, south of N. Boylston Street; therefore, the 100 meter threshold was used.*

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 5 acres at a distance of 100 meters in SRA 1 Central Los Angeles.

The data provided in **Table III-4**, shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors.

Construction-Related Toxic Air Contaminants

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year

lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 14 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxic Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

Therefore, a less than significant local air quality impact would occur from construction of the Project and no mitigation measures are required.

Operation

Localized Significance – Operation

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive receptors to the Project Site include: the residential uses located approximately 390 feet to the west, east of Elysian Park Drive, and the residential uses located approximately 345 feet to the east, south of N. Boylston Street.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project includes the operation of a skilled nursing facility. Due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots Analysis

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and federal CO standards which were presented above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general Project vicinity. Because of reduced speeds and

vehicle queuing, “hot spots” potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles City Department of Transportation evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

Per the Transportation Assessment in **Appendix I** of this IS/MND, the Project would generate a total of 399 daily trips with incorporation of TDM measures. Figure 11 in the Transportation Assessment showed that intersection with the highest peak hour volumes in the Project vicinity is located at Scott Avenue and Stadium Way. The Future with Project Traffic Volumes AM Peak hour volume (during April only with a high number of baseball games) is 1,698, which would contribute to an average daily traffic (ADT) volume of 17,960. Therefore, as the intersection with the highest volume falls far short of 100,000 vehicles a day, no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the ongoing use of the Project.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

Mitigation Measures

None required.

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

Less than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

According to the SCAQMD *CEQA Air Quality Handbook*, an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

If the proposed Project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project involves the construction and operation of office and medical uses; which is not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Trash receptacles for the Project would be covered, and odors from trash would be contained within the trash area. Therefore, as the Project is required to comply with SCAQMD Rule 402, the Project would not create objectionable odors affecting a substantial number of people. Potential impacts associated with objectionable odors would be less than significant and no mitigation is required.

Cumulative Impacts

Cumulative projects include local development as well as general growth within the Project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area.

The Project area is out of State attainment for both ozone and particulate matter (PM_{10} and $PM_{2.5}$). Because the South Coast Air Basin is currently in nonattainment for PM_{10} and $PM_{2.5}$, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative

impact. As discussed above, the maximum mass daily regional construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and would not be cumulatively considerable. The Project would not result in a significant cumulative air quality emissions impact and no mitigation measures are required.

As with the Project, construction of the related projects is expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, similar to the Project, the related projects are also required to comply with SCAQMD Rule 402, and these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.

Mitigation Measures

None required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis of the potential biological resources impacts of the Project is based, in part, on the information and conclusions contained within the Protected Tree Report[8] (Tree Report) prepared for the Project by Jan C. Scow Consulting Arborists, LLC in January 2021. The Tree Report is included as **Appendix B** to this IS/MND and its findings, conclusions, and recommendations are incorporated by reference herein.

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

Less than Significant Impact. The SNF building would be located on an existing surface parking lot. The Project Site is located in an urbanized and developed area of the City and the area proposed for new development within the Site has undergone previous disturbance associated with surface parking areas. Species likely to occur onsite are limited to small terrestrial and avian species typically found in developed settings. However, within the area proposed for new development, there are 34 trees. These trees could potentially provide nesting sites for migratory birds, which could be disturbed or removed by the Project. As such, 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 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that that Project would not 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

[8] *Jan C. Scrow Consulting Arborists, LLC, Protected Tree Report for Skilled Nursing Facility at Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, CA 90026, April 27, 2022.*

Service. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. No watercourses are located on or within the vicinity of the Project Site and no riparian habitat or other sensitive natural communities, including wetlands, are mapped on or near the Project Site.[9] As such, the Project would not have the potential to effect riparian habitat or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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. As previously discussed, no wetlands are mapped on or near the Project Site.[10] In addition, the Project does not propose any filling or grading of any ravines or other hydrologically low-lying areas that may contain intermittent waterbodies. As such, the Project would not have the potential to effect wetlands. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is not is not located within a Regional Wildlife Linkage, Essential Connectivity Area, or other formally recognized wildlife movement corridor. Additionally, there are no waterways located in the vicinity of the Project Sites that are used by migratory fish, and there are no wildlife nursery sites in the area. Furthermore, the Project Site is located in an urbanized area of the City and is occupied by medical and support buildings and surface parking areas. Although there are undeveloped, open space areas on and adjacent to the Project Site, the Project Site and the adjacent Elysian Park area are isolated from other natural

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[9] *U.S. Fish and Wildlife Services, National Wetlands Inventory, Wetlands Mapper, available at: https://www.fws.gov/wetlands/data/mapper.html, accessed November 15, 2021.*

[10] *U.S. Fish and Wildlife Services, National Wetlands Inventory, Wetlands Mapper, available at: https://www.fws.gov/wetlands/data/mapper.html, accessed November 15, 2021.*

open space areas by freeways and highly developed areas of the City, and no connectivity for wildlife exists. As discussed previously, the Project would be required to comply with the MBTA, to reduce potential impacts to migratory bird species that could potentially nest in trees that would be removed as part of the Project. As such, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact with Mitigation Incorporated. According to the Tree Report, there are a total of 34 trees, including 9 protected on-site trees consisting of 7 coast live oak trees (*Quercus agrifolia*), 1 Toyon (Heteromeles arbutifolia), and 1 Elderberry (Sambucus nigra); and 7 City street trees consisting of 5 Tasmania blue gum trees (*Eucalyptus globulus*), 1 Canary Island date palm tree (*Phoenix canariensis*), and 1 Toyon (Heteromeles arbutifolia), and 18 non-protected onsite trees located within the area of the Project Site proposed for development of the new SNF and parking lots. The Project would require the removal of 9 non-protected trees, however, none of the trees that would be removed are protected species or street trees; therefore, the Project would not require a tree removal permit or replacement trees.[11] However, Project activities would encroach on 6 protected trees, including 4 coast live oak trees (*Quercus agrifolia*), 1 Toyon (Heteromeles arbutifolia), and 1 Elderberry (Sambucus nigra) identified as Tree Nos. 19, 20, 22, 23, 32, and 33 in **Appendix B**. The Project construction and operational activities would not cause the removal of any protected trees, but are expected to have minor impacts to 3 protected trees (Tree Nos. 22, 23, and 33), moderate impacts to 2 protected trees (Tree Nos. 19 and 32), and a major impact on 1 protected tree (Tree No. 20). Accordingly, mitigation measures **MM BIO-1** through **MM BIO-11** would be required. Mitigation measures **MM BIO-1** through **MM BIO-11** establish tree protection protocols, such as protective fencing, to be implemented during construction pursuant to the Site- and Project-specific Protected Tree Plan presented in **Figure IV-1, Protected Tree Plan**, (shown at the end of this Biological Resources section) as well as the proper pruning and landscape installation and irrigation in the vicinity of existing trees. The measures would also require the retention of a Project Arborist to conduct construction monitoring during activities with the potential to encroach on or damage protected coast live oak trees (*Quercus agrifolia*). Following implementation of mitigation measures **MM BIO-1** through **MM BIO-11**, the Project would not conflict with the City's protected tree ordinances and codes. Therefore, impacts would be less than significant with mitigation.

Mitigation Measures

MM BIO-1 **Contractor Responsibility.** The project applicant will ensure that all contractors have read and are familiar with the requirements laid out in these tree protection mitigation measures. A copy of this document and the Protected Tree Plan shall be kept on site at all times. It is the contractor's responsibility to become familiar

[11] *Jan C. Scow Consulting Arborists, LLC, Protected Tree Report for Skilled Nursing Facility at Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, CA 90026, January 14, 2021.*

with all the tree protection measures described below and to adhere to them as they apply to their portion of the work.

MM BIO-2 **Project Arborist**. The Project Applicant shall obtain a Project Arborist onsite to provide construction monitoring of certain construction activities. It is the applicant's responsibility to contract a Project Arborist that will be present for construction monitoring and project milestones as indicated in this report. We will provide our Project Arborist contract if requested by the applicant, but the applicant may hire any certified arborist of their choosing to fulfill this role. It is also the applicant's responsibility to notify the Project Arborist when those milestones requiring arborist presence are reached. The Project Arborist shall be provided with 72 hours of notification prior to their required onsite presence to conduct the construction monitoring. The Project Arborist shall be required to monitor the following:

- Clearing or grading;
- Any digging, excavating, trenching, or building within the canopy dripline of any protected tree;
- Any pruning of any protected tree's canopy or roots takes place; and
- Any other activity within the canopy dripline of any protected tree.

MM BIO-3 **General Tree Protection Measures**. The following general tree protection measures shall be applied where they are relevant. If there is a conflict between the Specific tree protection measures for this Project above and any of these General tree protection measures, the Specific tree protection measures shall supersede:

- All work conducted in the ground within the root protection zone of any protected tree shall be accomplished with hand tools only. The root protection zone is defined as the area within a circle with a radius equal to the greatest distance from the trunk to any overhanging foliage in the canopy.
- Where structural footings are required and major roots will be impacted, the footing depth shall be reduced to 12 inches. This may require additional "rebar" for added strength. An alternative shall involve bridging footings over roots and covering each root with plastic cloth and 2 to 4 inches of Styrofoam matting before pouring concrete.
- Any required trenching which has multiple trench path options shall be routed in such a manner to minimize root damage. Radial trenching is less harmful than tangential trenching because it runs parallel to tree roots rather than diagonal or perpendicular to them. Whenever possible trenching shall work around roots rather than cutting them. Pipes and cables shall be placed below uncut roots, and the same trench shall be utilized for as many utilities as possible.
- "Natural" or pre-construction grade shall be maintained for as great a distance from the trunk of each tree as construction permits. At no time during or after

construction shall soil be in contact with the trunk of the tree above natural grade.

- In areas where grade would be lowered, or where footings would be dug, some root cutting may be unavoidable. Cuts shall be made cleanly with a sharp saw or pruning tool, far enough behind the damage that all split and cracked root portions are removed. The cut shall be made at right angles to the root so that the wound is no larger than necessary. When practical, roots shall be back to a branching lateral root. Applying pruning wound treatment (e.g. “Tree Seal”) to cuts shall be prohibited.
- When removing pavement, as little disruption of soil as necessary shall be attempted. This may mean using hand tools within the root protection zone of protected trees. It may also mean removing the pavement in a backwards direction away from the trunks of protected trees, while keeping personnel and equipment on the pavement as it is removed.
- Pruning of oaks shall be limited to the removal of dead wood and the correction of potentially hazardous conditions, as evaluated by a qualified arborist. Pruning oaks excessively is harmful to them. Removal or reduction of major structural limbs shall be done only as required for actual building clearance or safety. If limbs must be removed, cuts shall be made perpendicular to the branch, to limit the size of the cut face. The branch bark collar shall be preserved (i.e. no “flush cuts”), and cuts shall be made in such a way as to prevent the tearing of bark from the tree. All pruning shall be done in accordance with ANSI A-300 pruning standards. Applying pruning wound treatment (e.g. “Tree Seal”) to cuts shall be prohibited.
- To minimize soil compaction, all activity and traffic within the root protection zone shall be kept to a minimum.
- The root protection zone shall not be subjected to flooding incidental to the construction work, or to disposal of construction debris such as paints, plasters, or chemical solutions. No equipment fueling or chemical mixing shall be done within the root protection zone.
- The amount of environmental change, including drastic increases or decreases in the amount or frequency of watering from historic conditions, which trees would be subjected to shall be minimized.
- Care shall be exercised not to allow equipment to physically damage the tree’s trunk, root crown, or lower scaffold branches during construction. This includes but is not limited to 1) impact damage by scrapers, buckets, or hoes; or 2) damage by tires, wheels, or tracks from operating in close proximity to trees.

MM BIO-4 **Order of Tree Protection Operations**. The following order of operations shall be consulted and followed in order to ensure best implementation of tree protection measures:

1. Prior to the start of any demolition or construction, protective fencing shall be installed as shown on the Protected Tree Plan and according to mitigation measure **MM BIO-5**.
2. After protective fencing is installed and verified by the Project Arborist, demolition and construction activities may commence.
3. Prior to excavation and construction of the parking area, an exploratory trench shall be dug near Tree 20 to determine root presence along the parking area curb in accordance with **MM BIO-7**. The Project Arborist shall inspect the trench before any work in the parking area commences.
4. Only after all demolition and construction outside the protective fencing areas is complete, protective fencing may be removed and work inside the protective fencing areas may commence. This includes demolition of remaining asphalt north of Tree 32, grubbing and landscaping activities.

MM BIO-5 **Protective Fencing**. Prior to the start of construction or demolition activities, protective fencing shall be installed as shown on the enclosed Protected Tree Plan. The Project Applicant shall ensure that the installed protective fencing is photographed for submittal to the City of LA Urban Forestry Department along with the Tree Report. The Project Arborist shall inspect all protective fencing upon installation. Fencing shall be chain-link, at least 5 feet high, and held in place by steel stakes driven directly into the ground.

There shall be no easy access into the protective fencing area. If a gate in the protective fencing is necessary, it shall be padlocked during construction activities with limited, authorized access only. A durable sign shall be securely affixed to the fencing that reads:

PROTECTED TREE
This fence shall not be moved or entered without authorization
[insert appropriate project contact information]

All protective fencing shall remain intact until construction is completed. No workers shall enter the fenced protection zones. No debris or equipment storage, waste disposal, equipment cleanout, outhouse, or vehicle parking shall be allowed within the fenced areas.

Protective fencing shall remain in place throughout demolition and construction and shall only be removed near the end of the project when asphalt demolition, grubbing, and landscaping inside the fenced areas is ready to begin.

MM BIO-6 **Demolition of Building 26 and Cement Slab Near Tree 19 and Tree 20**. Care shall be taken to minimize damage to the root systems and canopies of Tree 19 and Tree 20 during demolition of the Building 26 and the cement slab. The structures shall be demolished using manual labor (no machinery) within the

canopy driplines. Demolition of the foundations shall be done in a backwards direction within the canopy driplines, starting closest to the trunks of the trees and working away from them. All personnel, equipment, and debris shall remain on the foundation as it is removed to prevent disturbance of the exposed soil under the canopy driplines.

MM BIO-7 **Exploratory Trenching Near Tree 20**. Prior to excavation and construction of the parking lot proposed for the central portion of the Project Site, an exploratory trench shall be dug along the parking area curb edge within 15 feet of the trunk of Tree 20. The trench shall be as deep as the required excavation and subgrade activity for the curb and parking area, and as wide as necessary (away from the tree) to accommodate digging. The exploratory trench shall be dug using hand tools or an AirSpade only, and any roots less than two inches in diameter shall be cut cleanly using a sharp saw or pruning tool. No roots two inches or larger in diameter shall be cut during digging. The Project Arborist shall inspect the exploratory trench and the exposed roots that are two inches or larger in diameter and provide mitigation recommendations accordingly.

MM BIO-8 **Excavation Near Tree 22 and Tree 23**. If roots are encountered during excavation for the parking area curb near Tree 22 and Tree 23, cuts shall be made cleanly with a sharp saw or pruning tool, far enough behind any damage that all split and cracked root portions are removed. The cut shall be made at right angles to the root so that the wound is no larger than necessary. When practical, cut roots back to a branching lateral root. Applying pruning wound treatment (e.g. “Tree Seal”) to cuts shall be prohibited.

MM BIO-9 **Safety Pruning of Tree 19 and Tree 20**. The Project Arborist shall be consulted prior to safety pruning of Tree 19 and Tree 20. Any pruning shall be carried out by an ISA Certified Arborist, or under the direction of the Project Arborist. All pruning shall conform to ANSI A-300 pruning standards at a minimum.

MM BIO-10 **Landscaping Around Oak Trees**. When designing and installing landscaping and irrigation around existing protected oak trees, the following guidelines shall be followed:

- Grubbing work shall be done carefully to prevent damage to the roots of oak trees within 10 feet of their trunks. Any grubbing work within the protective fencing areas shall be completed after construction on the site is complete and protective fencing is ready to be removed;
- No planting of any type, irrigation, or irrigation overspray shall occur within 10 feet of any oak trunk;
- Only drought tolerant or native plants shall be planted within 20 feet of any oak trunk;
- No lawn or groundcover requiring frequent irrigation shall be planted within the canopy dripline of any oak tree;

- Three to four inches of organic mulch (freshly chipped tree trimmings) shall be maintained within 20 feet of oak trunks, wherever possible; and
- Underground irrigation lines shall be kept out of the oak canopy dripline to the extent possible, and shall be installed (when they are necessary within the dripline) without doing any root damage to the oak tree. Irrigation trenching within the canopy dripline of any oak shall be done using hand tools only.

MM-BIO 11 **Demolition of Asphalt Near Tree 32.** Asphalt located inside the protective fencing area near Tree 32 shall remain in place until demolition and construction outside the fenced area are complete and only work inside the fenced area remains. The asphalt shall be removed carefully using hand tools only. Care shall be taken not to damage roots under the asphalt with tools or debris. **If any roots measuring two inches in diameter or larger are encountered, work shall cease and the Project Arborist shall be consulted on how to proceed.**

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 located in an urbanized area of the City. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Site,[12] and the Site is not subject to any Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[13] As such, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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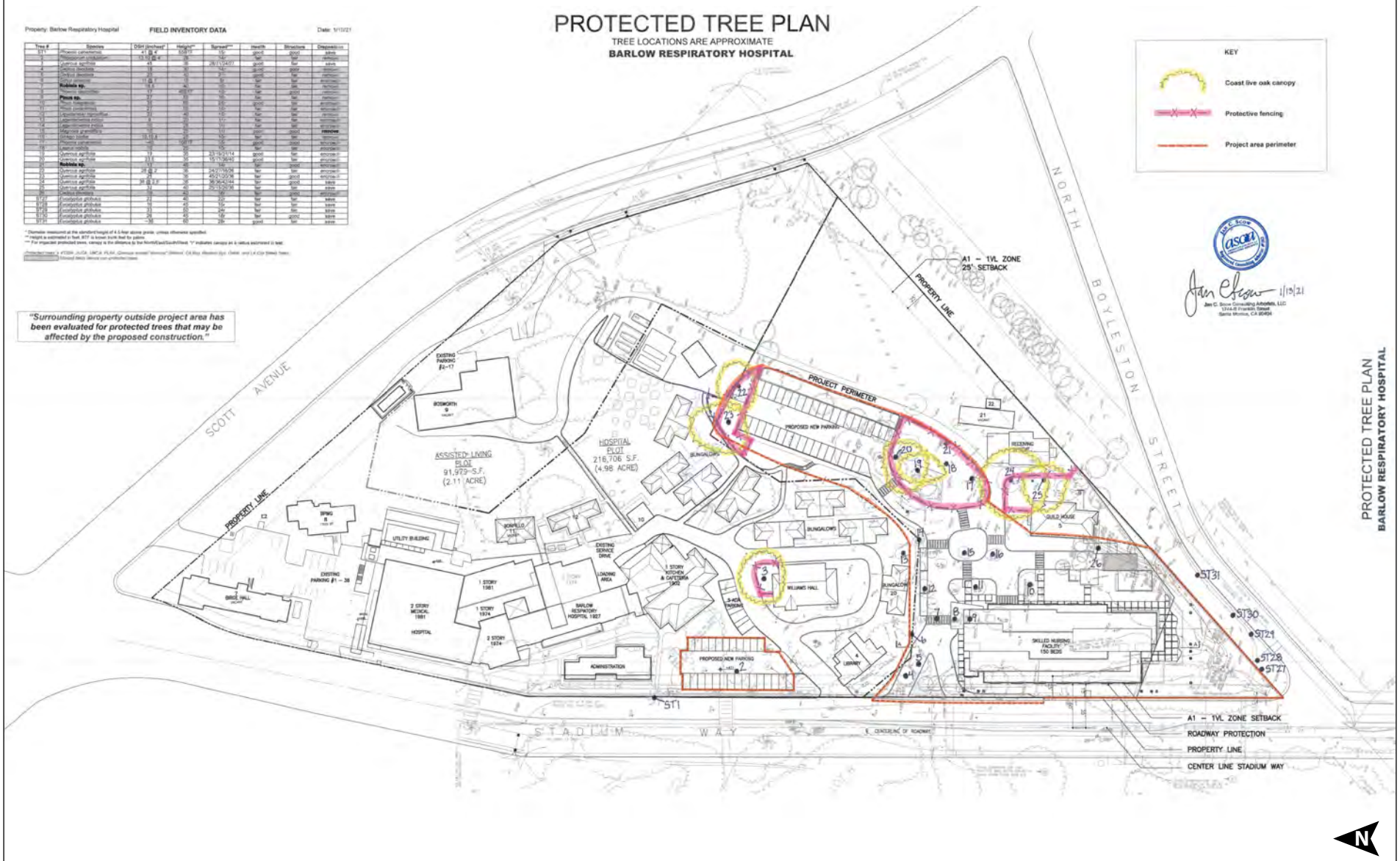
12 *City of Los Angeles, General Plan Conservation Element, Adopted September 26, 2001, Exhibit B2.*

13 *City of Los Angeles, Zone Information and Map Access System (ZIMAS), available at: http://zimas.lacity.org, accessed November 16, 2021.*



Source: Zakian Woo Architects, 2020 and Jan C. Scrow Consulting Arborists, 2021

Figure IV-1
Protected Tree Plan

V. CULTURAL RESOURCES

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

The following analysis of potential cultural resources impacts of the Project is based, in part, on an Historical Impacts Analysis report (Historical Report)[14] prepared for the Project by Kathryn McGee in April 2021 and revised July 2022, and a search of the California Historical Resources Information System for all recorded archaeological and built-environment resources and a review of cultural reports on file for the Project Site and vicinity conducted by the South Central Coastal Information Center (SCCIC) on February 2, 2022. The Historical Report is included as **Appendix C** to this IS/MND, the SCCIC records search is included as **Appendix D**, and their findings, conclusions, and recommendations are incorporated by reference herein.

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

Less than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. The City of Los Angeles CEQA Thresholds Guide states that a substantial adverse change in significance of an historic resource would occur if a project involves: demolition of a significant resource; relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource; conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and guidelines for Rehabilitating Historic Buildings; or construction that reduces the integrity or significance of important resources on the site or in the vicinity. CEQA Guidelines 15064.5(b)(3) also provides that generally, a project that follows the Secretary of the

[14] *Kathryn McGee, Impacts Analysis for the Barlow Respiratory Hospital Skilled Nursing Facility Project, prepared April 30, 2021, revised July 18, 2022.*

Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or 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.

Project Site History and Evaluation

The Barlow Sanatorium was founded in 1901 by Dr. Walter Jarvis Barlow with the purpose of providing care for indigent tuberculosis patients who resided in Los Angeles County; the first patient was admitted in 1903. The BRH campus qualifies as an historical resource under the California Environmental Quality Act (CEQA). It is historically significant as a rare, largely intact example of an early twentieth century tuberculosis treatment facility in Southern California, as well as for association with its founder, Dr. Walter Jarvis Barlow, and for its architecture, with most of the buildings constructed before 1930 and designed in the Shingle, Craftsman, and Spanish Revival architectural styles. In 1990, the BRH campus was designated by the City as Historic-Cultural Monument No. 504,[15] the boundaries of which are contiguous with the legal boundaries of the Barlow Hospital property, including the parcel to the west across Stadium Way outside of the boundaries of the Project Site. In 1992, the BRH campus was evaluated by consulting firm Historic Resources Group (HRG) and found eligible for listing on the National Register of Historic Places (1992 HRG Survey).[16] In 1994, it was assigned California Historical Resource Status Code (CHRSC) "2D," which means, "Contributor to a district determined eligible for the National Register by consensus through Section 106 process: Listed in the California Register."[17] Thus, the BRH campus is listed in the California Register as an historic district. The BRH campus was re-evaluated in 2012 in a technical report prepared by HRG (2012 HRG Report) as part of CEQA review for a project that was not ultimately implemented.[18] That technical report confirmed the property's continuing status as an HCM/Historic District with 32 contributing buildings and landscape features.

Project Impacts

Skilled Nursing Facility (SNF)

The proposed new SNF building and associated hardscape and landscape features would be located at the southern corner of the subject property on an area currently occupied by a surfaced parking lot and lawn with mature trees. This area of land was historically covered with an orchard or other foliage from 1928-1947, with the surface parking lot added by 1964. Neither the surface parking lot nor lawn area are designated as contributing features of the HCM/Historic District though some of the plantings in the lawn area may date from the district's period of significance.

The SNF building would be four stories and approximately 60 feet in height (including ground floor parking, a subterranean basement housing kitchen, electrical and mechanical facilities). The

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15 *Resolution, File No. 94 1810667, Historical Resources Designation for Barlow Sanitorium, 2000 Stadium, Los Angeles, CA 90026, City of Los Angeles Cultural Heritage Commission, October 9, 1990.*

16 *Historic Resources Group, Cultural Resources Evaluation of Barlow Hospital, February 1992, pages 23-24.*

17 *Built Environment Resource Directory, California Office of Historic Preservation, https://ohp.parks.ca.gov/?page_id=30338, accessed September 8, 2022.*

18 *Historic Resources Group, Historical Resources Technical Report, Barlow Hospital Replacement and Master Plan Project, April 2012.*

existing parking lot sits at a lower grade than Stadium Way and would enable the first floor of the SNF building to likewise sit below the grade of the street, reducing the apparent height of the new building as viewed from the street and from contributing buildings of the HCM/Historic District. Positioned in this corner of the property, away from most existing contributing buildings, the SNF building would be sited strategically to avoid interrupting the Hospital's historic bucolic setting and manner in which existing buildings relate to each other.

The SNF building has been sensitively designed with massing broken down into smaller volumes, especially at the north and south elevations, providing visual transition down to the lower scale of the contributing buildings of the HCM/Historic District. A one-story support structure and low walls would serve to further break down the mass and soften the edges of the SNF building near the adjacent historic Guild House Building.

The SNF building's architecture is simple and complements, rather than competes with, that of existing buildings. It is contemporary and does not promote a false sense of history. However, picking up on the historic use of the long-stay residential cottages, the SNF building employs residential motifs with a repetitive rhythm of windows and a ground floor elevation at the same level as its surrounding open spaces, creating a welcoming pedestrian experience and an ease of transition between the outside and inside. Large patient windows with projecting awning segments would break up the surface and help reduce the scale. Color differences would accentuate the different layering of the building's mass. A vertically oriented metal louver system attached at the exterior of the south east corner would breakdown the building mass, offer variety of scale, reduce visibility of occupants from the outside, increasing privacy, while allowing in plenty of daylight.

Landscaping

The Project preserves some mature trees and incorporates ample new landscaping to preserve the historic setting as a bucolic landscape while also providing visual buffering between new and old buildings (see **Figure 3-21, Planting Schedule**, previously presented in **Section 3, Project Description**). The landscape plan shows that existing mature trees include Oaks, Pines, Palms, Eucalyptus, Honey Locust varieties to be preserved. Additionally, proposed new trees have been selected to reference the setting of the historic landscape while softening edges of the new building, and include: Coast Live Oak, Cedar, Coral, Chinese Flame, Watermelon Red Crape Myrtle, and Brisbane Box trees. The 2012 HRG Report explains that there are contributing landscape features on the site that date from the period of significance, specifically in the "portions of the central green space that fronts building #2A and the space behind cottage #20." However, no precise configuration of the hardscape, trees, or plants are specifically called out as contributing. The proposed plan to retain as many mature trees as possible and replace existing green space with some new plantings to effectively preserve the historic sense of open space and character of the HCM/Historic District (see **Figure 3-17 and Figure 3-18**, previously presented in **Section 3, Project Description**). As provided by the 2012 HRG Report, "[t]he significance of the Barlow Hospital site derives from the collective interplay of topography, landscape, circulation pattern and buildings, rather than from any single contributing feature."[19]

[19] *Historic Resources Group, Historical Resources Technical Report, Barlow Hospital Replacement and Master Plan Project, April 2012, page 35.*

The natural, undeveloped hillsides surrounding the property would not be altered as part of the proposed project.

Parking Lot Areas

The Project would require 123 parking spaces to serve the hospital pursuant to ZA 93-0922. Based on the City's convalescent home parking requirements, 30 additional spaces would be required for the SNF building, resulting in a total requirement of 153 parking spaces for the Project. The Project proposes to provide 165 spaces through a combination of two new parking areas (Parking Lots 4 and 5) and in ground level parking within the SNF building. Parking Lot 5 would be located on an area adjacent to the existing Hospital administration building and landscaped with drought tolerant planting, where it would be accessible from an existing driveway to Stadium Way. Parking Lot 5 would be enhanced by new planting and street trees at Stadium Way to provide shade and screening. Parking Lot 4 would be located behind the Hospital's main campus buildings where it would be completely screened from view from the main campus by grade changes, existing landscaping in the area, and cottages at its west side. Construction of Parking Lot 4 would necessitate the removal of Building 26, which is a contributing building of the HCM/Historic District, and removal of an existing concrete slab (formerly for Building 27, demolished in 2012); both features are described detail below:

- **Building 26**. Building 26 is utilitarian and currently used for maintenance. The building is positioned at an angle though for purposes of this report is described as oriented to the west. The building is sited in a sunken paved area defined by a sloped landscaped berm to the north, east, and west. The slab for the former Building 27 (demolished c. 2012) is immediately northeast of Building 26. Three large metal storage containers are on top of the slab, with four additional large metal storage containers to the south of Building 26.

  Building 26 is one story and rectangular in plan with stucco exterior walls and a gable roof. Roofing material is contemporary composite. The primary west façade includes two pairs of wood ledged and braced panel garage doors at its north end; a small rectangular vent opening high on the wall, roughly centered in the elevation; and a pair of simple, contemporary doors at the south end of the elevation, accessed by a concrete stoop. The north elevation is a blank wall with a wood louver air vent below the gable peak and a contemporary wood canopy extending to the north, covering a modestly sized concrete patio, supported on wood posts. There is a utilitarian sink mounted to the wall. The south elevation has a matching wood louver air vent below the gable peak and a single widow centered in the elevation, with glass louvers and a window-mounted air-conditioning unit. The east elevation is not readily visible as it abuts the sloped hillside to the east.

  The interior of Building 26 is currently used for storage of maintenance supplies and configured as one open space with partition walls sectioning off the north and south halves of the interior. The north space is situated slightly lower than the south space. Walls, ceilings, and floors are clad in contemporary finishes. The following history of Building 26 is excerpted from the survey form prepared in 1992:[20]

  "The Maintenance Shop was built in 1916 as a bath building known as El Bano. Built at a cost of $3502.73, the donation of the Herman W. Hellman Estate, it afforded the medical

[20] *Historic Resources Group, El Bano, Building #26, Historic Resources Inventory Form, State of California – The Resources agency, Department of Parks and Recreation, Office of Historic Preservation, form prepared 1992.*

staff the opportunity to order hot or cold showers for the patients. The structure originally contained separate areas for men and women with multiple showers, dressing rooms, and toilets. El Bano featured a tile roof, a clerestory for light and ventilation, and stucco exterior walls. It was originally situated among the largest group of tent cottages. By 1919, with the installation of bathing facilities in the new cottages, the bathhouse was no longer needed. The Hellman family offered to convert the structure into a patient cottage. Instead, the structure was, apparently, moved in 1926 from the north side to the south side of the Garage (#27), where it became a workshop and garage, a use it retains today. The building retains its 1920s appearance and historic associations, and as such is a contributor to the potential Barlow historic district. It is an example of the type of patient service and maintenance structures on the property during its period of significance."

The following documents known alterations to Building 26:

- The building was moved to current location for use as a workshop and garage (1926);
- The main entrance, originally in the south elevation, was subsequently reoriented to the side;
- (northwest) elevation, with new garage and pedestrian doors added (date unknown);
- The original tile roof was replaced with contemporary composite material and original roof;
- cupola was removed (prior to 1992);
- The original, distinctive monitor roof structure was removed (after 2012);[21]
- The wood canopy and patio were added to north elevation (after 2012); and
- Alterations were made to the setting through removal of Doctors' and Nurses' Garage (the adjacent, former Building 27, described below, 2012).

The 1990 HCM designation is unclear about whether Building 26 is considered a contributing building to the designated HCM. The nomination includes a labeled map with list of numbered buildings. Building 26 is not included in that map or list.

The 1992 HRG Survey, which was prepared after the HCM designation, identifies Building 26 as a contributing feature of the historic district, and it is included in the California Built Environment Resource Directory as a contributing feature of the California Register-listed historic district. The eligibility of Building 26 was confirmed in HRG's 2012 Report.

Recent maintenance work to Building 26 included the removal of its distinctive monitor roofline, which leaves the building with few early features associated with its early history as a bathhouse. Building 26 is also minimally visible, due to its location within the property. Since being repurposed and subsequently relocated to its present location, it has been a

[21] *The precise date of removal of the monitor roof is unknown as no building permit is available documenting this work.*

simple building with few defining features and is utilitarian in its current function. However, Building 26 may continue to contribute to the significance of the HCM/Historic District.

- The concrete slab to be removed was historically associated with Building 27, the Doctors' and Nurses' Garage, constructed in 1921 (not extant). This building was a one-story utilitarian wood frame structure. Though it was documented in the 1992 HRG survey, it was found to be a non-contributor to the HCM/historic district at that time.[22] It was also found to be a non-contributor in the 2012 HRG Report. The garage was demolished around 2012, when a permit was issued for its demolition.[23] Removal of the slab would not remove any significant historic material.

Direct Impacts

The following evaluates potential direct impacts of the Project on the HCM/Historic District and potentially individual significant buildings on the Project Site. To this end, the Project is evaluated for conformance with each of the *Secretary's Standards*.

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

The Project would further the important historic use of the BRH campus as a hospital specializing in respiratory ailments. The new SNF would provide an additional and necessary expanded level of care for hospital patients weaning from prolonged mechanical ventilation. The proposed new building has been carefully sited in the southern corner of the property on an existing parking lot away from the other buildings in the historic hospital campus, thus, minimally altering existing distinctive spatial relationships between contributing buildings of the HCM/Historic District. While Building 26 would be removed to facilitate construction of the required parking, that building is minimally visible and utilitarian. Its removal would not change important spatial relationships that convey the history of the overall HCM/Historic District, which will continue to read as an early hospital campus. Therefore, the Project conforms with Standard 1.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

The historic character of the HCM/Historic District will be retained and preserved. As previously noted, the proposed new SNF building has been carefully sited to avoid impacting important spatial relationships that characterize the historic setting of the HCM/Historic District, which is currently characterized by one- and two-story buildings situated in a bucolic landscape. It's positioning slightly below the grade of Stadium Way further lessens the impact of the new building's height. No contributing hardscape or landscape features are proposed for removal. Proposed new hardscape and landscape is designed to integrate with the setting while softening the edges of the proposed new building. As previously noted, Building 26 would be removed, but its removal would not impair the ability of the historical resource to convey its significance as an early tuberculosis sanitorium. Both the HCM/historic district would continue to be eligible with its

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[22] *Historic Resources Group, Doctors' and Nurses' Garage, Historic Resources Inventory Form, State of California—The Resources Agency, Department of Parks and Recreation, Office of Historic Preservation, February 28, 1992.*

[23] *Application for Inspection to Demolish Building or Structure, 2000 N Stadium Way, City of Los Angeles Department of Building and Safety, Permit no. 12019-20000-00744, May 15, 2012.*

removal. Building 26 has always been a modest support structure, in its early history as a bathhouse and especially once converted to a maintenance building in 1926. It is inherently secondary in nature. Additionally, its current positioning in a physically isolated maintenance area apart from other contributing buildings already hinders a strong visual connection with the other campus buildings. Therefore, the Project conforms with Standard 2.

3. *Each property will 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 elements from other historic properties, will not be undertaken.*

The Project would not create a false sense of historical development. The architecture of the proposed new building is clearly contemporary in its design, with simple, rectangular forms and use of contemporary materials. By contrast, most existing buildings on the property were constructed before 1930 and designed in the Shingle, Craftsman, and Spanish Revival architectural styles. Therefore, the Project conforms with Standard 3.

4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

The Project would not remove any features of the HCM/Historic District that have taken on significance over time. Therefore, the Project conforms with Standard 4.

5. *Distinctive materials, features, finishes, and construction techniques or examples of craftmanship that characterizes a property will be preserved.*

The Project would not remove distinctive materials, features, finishes or construction techniques that characterize the property. The existing parking lot where the proposed new SNF building would be located is not considered significant. Building 26, to be removed as part of the Project, has been altered and, while it may remain eligible as a contributor to the HCM/Historic District, does not retain distinctive materials, features, finishes or construction techniques that would be removed as a result of the proposed project. There are no significant existing pathways or hardscape features in the area of the Project. Therefore, the Project conforms with Standard 5.

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

This standard is not readily applicable. The Project would not replace any deteriorated historic features.

7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

This standard is not readily applicable, as no chemical or physical treatments to historic material are proposed by the Project.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Given that most of the ground in the Project area appears to have already been previously disturbed, archaeological resources are not anticipated. In addition, as discussed in greater detail

in response to **Checklist Question V(b)** below, regulatory compliance measures and procedures related to the incidental discovery of archaeological resources discovered during construction are standard conditions of approval for grading permits required by the Department of City Planning and Building and Safety.

9. *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

The Project would not destroy historic materials, features, or spatial relationships that characterize the HCM/Historic District. As previously stated, the proposed new SNF building has been carefully sited on an existing parking lot to avoid removal of contributing buildings and positioned in a far corner of the BRH campus to avoid impacting important spatial relationships that characterize the HCM/Historic District. The architecture of the new building is clearly contemporary in design with rectangular massing and forms utilizing modern materials. Its height would be taller than immediately adjacent buildings, such as the two-story Guild House and one-story Library; though it would relate to the existing two-story Hospital building addition (constructed 1978). The regular grid of windows would reflect historic residential uses and motifs, especially of the 1978 Hospital addition. The new building would be articulated on its side elevations to reduce the sense of the mass. A new one-story support structure and low walls to the east further break down the mass and transition the scale down to a one-story height. Landscaping would be strategically used to soften the edges of the building and provide visual transition to the surrounding HCM/Historic District. As previously stated, no specific, contributing hardscape or landscape features are proposed for removal, though some areas of landscape that would be part of the Project date from the HCM/Historic District's period of significance. Proposed new hardscape and landscape is designed to integrate with the setting, while softening the edges of the proposed new building. In order to reference the historic bucolic setting, special attention has been paid to incorporating substantial landscaping and mature trees into the Project. As previously noted, Building 26 would be removed, but its removal would not adversely impact the HCM/Historic District. Therefore, the Project is in substantial conformance with Standard 9.

10. *New additions and adjacent or related new construction will 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.*

The Project would not be readily reversible. However, given that the location of the proposed new SNF building is on an existing parking lot in a corner as far away from historic buildings on the BRH campus as possible, the essential form and integrity of the HCM/Historic District would be unimpaired. Therefore, the Project conforms with Standard 10.

In summary, the Project is in substantial conformance with the *Secretary's Standards* and would not directly impact the HCM/Historic District, which would continue to convey its significant historical associations and maintain eligibility for listing locally and in the California Register.

Indirect Impacts

In general, CEQA describes an indirect impact as one that results from the "…alteration of the resource or its immediate surroundings such that the significance of an historical resource would

be materially impaired."[24] Given the Barlow Respiratory Hospital's property is relatively isolated from other surrounding development due to the topography, there do not appear to be any other properties that have a visual connection to the property such that they could be indirectly impacted. For purposes of completeness, it should be noted that Dodger Stadium is located nearby to the southeast, and was identified as an historical resource in SurveyLA,[25] but does not have a visual connection to the subject property. Therefore, the proposed project will not cause indirect impacts to historical resources, either on the property or nearby.

Conclusion

Barlow Respiratory Hospital is designated as a City of Los Angeles HCM and is listed in the California Register as an historic district. The Project involves demolition of one building (Building 26, maintenance building), which was not clearly identified as a contributing feature in the 1990 HCM designation but was later identified as a contributor to the HCM/Historic District. Despite alterations, Building 26 may remain eligible as a contributor to the HCM/Historic District. However, it is a minimally-visible, utilitarian building and its removal would not result in an historical resources impact on the overall HCM/Historic District. Given that the design of the Project locates the new building on an existing parking lot, as far away from existing buildings as possible, the historic bucolic setting would be adequately preserved and mature trees from the historic landscape would be retained and incorporated into the Project. The design of the new building and landscaping would not impair the ability of the existing HCM/Historic District to continue to convey its significance. In addition, there do not appear to be any other historical resources in the vicinity of the Project Site that could be indirectly impacted by the Project. As such, based on the above, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. Accordingly, no impacts would occur and no mitigation measures would be required.

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

Less than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources.

Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[26] A search of the California Historical Resources Information System conducted by the SCCIC for the Project Site confirmed that no archaeological resources have been recorded at the Project Site or within 0.5-mile. However, the SCCIC notes that the Project Site and vicinity have not been surveyed for archaeological

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[24] *CEQA Guidelines §15064.5(b)(1)).*

[25] *Historic Places LA, Dodger Stadium, available at: http://www.historicplacesla.org/reports/9b131f79-79b9-4403-91fe-6d4efef53dab, accessed September 8, 2022.*

[26] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.*

resources; therefore, the archaeological sensitivity of the Project Site is unknown.[27] Therefore, although the Project Site has experienced some disturbance as part of construction, operation, and maintenance of the buildings, roadways, and parking, there is potential for the inadvertent discovery of unknown archaeological resources during development of the Project, particularly during excavation for the basement level of the proposed SNF building. However, in accordance with standard conditions of approval for grading permits, the Department of City Planning and Building and Safety requires adherence to regulatory compliance measures and procedures related to the incidental discovery of archaeological resources discovered during construction. If archaeological resources are discovered during surface grading or construction activities, work is required to cease in the area of the find until a qualified archaeologist has evaluated the find and treated it in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project are prohibited from collecting or moving any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. The Project's mandatory adherence to this standard condition of approval would ensure that if any archaeological resources are encountered during construction, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. Should human remains be encountered unexpectedly during grading or construction activities, 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 Public Resources Code Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resource Code Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

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[27] *South Central Coastal Information Center, California State University, Fullerton, Department of Anthropology MH-426, Record Search Results for the Property Located at 2000 Stadium Way, SCCIC File # 23132.9348, February 2, 2022. See* ***Appendix D*** *of this Draft EIR.*

VI. ENERGY

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The following analysis of potential energy impacts of the Project is based, in part, on the CalEEMod model outputs prepared as part of the AQ/GHG Study and energy consumption worksheets prepared for the Project. The CalEEMod outputs are included in **Appendix A** of this IS/MND) and the energy consumption worksheets are included as **Appendix E** to this IS/MND.

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.

Construction

Transportation-Energy

During Project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site. The Project would require site preparation and grading, including hauling material offsite; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. As taken from the CalEEMod "Annual" modeling prepared for the Project, diesel-powered construction equipment (such as off-road equipment and hauling and vendor trucks) would result in approximately 547.68 metric tons of carbon dioxide ($MTCO_2$), or 1,207,634 pounds of CO_2, while gasoline-powered construction equipment (such as worker automobiles) would result in approximately 86.19 $MTCO_2$, or 190,049 pounds of CO_2.[28] According to CO_2 emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2 and burning one gallon of gasoline produces approximately 19.6 pounds of CO_2.[29] Based on the U.S. Energy Information Administration fuel consumption factors, and the Project's estimated "total CO_2" emissions presented in the CalEEMod output sheets, it is estimated that the Project's construction activities

[28] *See Construction Transportation Energy Worksheet included as **Appendix E** to this IS/MND.*

[29] *U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.*

would consume a total of approximately 54,545 gallons of diesel fuel and approximately 9,696 gallons of gasoline. According to fuel sales data from the California Energy Commission, fuel consumption in Los Angeles County was approximately 3.56 billion gallons of gasoline and 563 million gallons of diesel fuel in 2019.[30] Accordingly, the Project's transportation-energy consumption during construction would represent a negligible portion of annual gasoline and diesel consumption within Los Angeles County.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction Projects in the region. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary.

Electricity and Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, construction of the Project would not require electricity to power most construction equipment. Electrical demand during construction is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Electricity use during construction would vary during different phases of construction. The majority of construction equipment during demolition and grading would be gas- or diesel-powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction. Therefore, impacts would be less than significant and no mitigation measures would be required.

Operation

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and

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[30] *California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019. Diesel is adjusted to account for retail (49%) and non-retail (51%) diesel sales. Note that due to the atypical fuel consumption during 2020 as a result of the Covid-19 pandemic, 2019 sales data were relied on for this analysis.*

from the Project Site by employees, patients, and visitors. According to the CalEEMod data sheets prepared for the Project's AQ/GHG analysis (see **Appendix A**), the Project would result in 1,250,235 annual VMT. According to CARB's On-Road Emissions Factor (EMFAC) model, diesel-powered vehicles will account for 4.61 percent of all on-road VMT and will have an average fuel efficiency weighted for percentage of miles traveled of 12 miles per gallon (mpg) in 2024 (the Project's operational year), while gasoline-powered vehicles will account for 89.95 percent of on-road VMT with a fuel efficiency of 25 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles will account for the remaining on-road VMT.[31] Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the Project would consume approximately 4,803 gallons of diesel fuel and 44,983 gallons of gasoline per year.[32] For comparison purposes, the fuel usage during Project operation would represent 0.001 percent of the projected 2024 annual diesel fuel-related energy consumption and 0.001 percent of the projected 2024 annual on-road gasoline-related energy consumption in Los Angeles County.[33]

The Project's employees, patients, and visitors would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. And as detailed in **Checklist Section XVII, Transportation**, the Project would not conflict with transportation plans.

Electricity and Natural Gas

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the CalEEMod outputs (see **Appendix A**), the Project would have an electrical demand of 338,297 kilowatt-hours per year (kWh/yr) and a natural gas demand of 1,052,655 cubic-feet (cf) per year, or 2,884 cf per day.[34] Electricity would be provided to the Project Site by the Los Angeles Department of Water and Power (LADWP), which projects that its total sales in 2024-2025 fiscal year (the Project's operational year) will be 23,286 gigawatt-hours (GWh).[35] Natural gas would be provided to the Project Site by Southern California Gas Company (SoCalGas), which projects that natural gas consumption within

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31 *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See EMFAC Operational Transportation Energy Worksheet in* ***Appendix E*** *to this IS/MND.*

32 *Calculated as follows for diesel: 4.61 percent of total 1,250,235 VMT = 57,636 diesel VMT / 12 diesel mpg = 4,803 gallons of diesel. Calculated as follows for gasoline: 89.95 percent of total 1,250,235 VMT = 1,124,586 gasoline VMT / 25 gasoline mpg = 44,983 gallons of gasoline.*

33 *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.67 billion gallons of gasoline and 529 million gallons of diesel in 2024 (i.e., the Project's buildout year). See EMFAC Operational Transportation Energy Worksheet in* ***Appendix E*** *to this IS/MND.*

34 *Note that the CalEEMod outputs present the Project's operational natural gas demand as 1,025,980 kilo-British thermal units (kBTU) per year. 1 kBTU = 1.026 cubic feet; 1,025,980 kBTU per year x 1.026 = 1,052,655 cf per year; 1,052,655 cf per year / 365 days per year = 2,884 cf per day.*

35 *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.*

SoCalGas' planning area will be approximately 2,480 million cf per day in 2024.[36] As such, the Project's electrical demand would represent 0.001 percent of LADWP's available supplies. The Project's natural gas demand would represent 0.0001 percent of the natural gas consumption within SoCalGas' area.

The Project would comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Los Angeles Green Building Code contains mandatory measures for nonresidential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction Projects. Furthermore, the 2019 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. With regard to transportation related energy usage, as discussed in greater detail in **Checklist Section VIII, Greenhouse Gas Emissions**, the Project would not conflict with the goals of the City of Los Angeles Sustainable City pLAn and SCAG's 2020-2045 RTP/SCS, which incorporate VMT targets established by SB 375. The Project's expansion of an existing use on an infill Project Site located within 0.5-mile of a major transit stop would serve to reduce VMT and associated fuel consumption within the region. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction LADWP's projected and planned sales. Similarly, petroleum-based fuels during construction would also represent a small fraction of the projected fuel use in Los Angeles County. Therefore,

[36] *California Gas and Electric Utilities, 2020 California Gas Report, page 145.*

the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

VII. GEOLOGY AND SOILS

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

The following analysis of potential geology and soils impacts of the Project is based, in part, on the Geotechnical Evaluation Report (Geotech Report) prepared for the Project by Leighton Consulting, Inc. in November 2020.[37] The Geotech Report is included as **Appendix F** to this IS/MND and its findings, conclusions, and recommendations are incorporated by reference herein.

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 located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface fault rupture to built structures. Surface rupture of a fault generally occurs within 50 feet of an active fault line.

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a Preliminary Fault Rupture Zone.[38] There are several Alquist-Priolo Earthquake Fault Zones in the Los Angeles region; the nearest Alquist-Priolo Earthquake Fault Zone to the Project Site is associated with the Raymond Fault and the Hollywood Fault, located approximately 2.8 miles north of the Project Site.[39] As such, the potential for surface fault rupture at the Project Site would be low. The Project would involve the development of a SNF building and surface parking and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for fault rupture. As such, the Project would not cause substantial adverse effects involving rupture of a known fault. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. There are numerous active faults in the region; as discussed above, the nearest active faults with a

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[37] *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020.*

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

[39] *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

surface trace are the Raymond Fault and the Hollywood Fault. In addition, the Santa Monica Fault and the Newport-Inglewood Fault are both located within 3.2 miles and 8.6 miles, respectively, of the Project Site.[40]

However, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its seismic design considerations as established in the Geotech Report that would be reviewed and approved or revised by LADBS as part of the building permit process. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotech Report and with all of the conditions issued by LADBS as part of their required review and approval, which would account for seismic calculations from probabilistic seismic hazard modeling for the Site.

The potential seismic hazard to the Project Site would not be higher than in most areas of the City or elsewhere in the region. The development of a SNF building and surface parking is an expected use typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for. As such, the Project would not cause substantial adverse effects involving seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the Site.

The Project Site is mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California Geological Survey.[41] However, effects of liquefaction are minimized through compliance with applicable building safety regulations, such as the California Building Code and

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[40] *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020, pages 10-12.*

[41] *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

LAMC. Pursuant to City Building Code Section 91.7006.2, the Project would be required to prepare and submit a final, site-specific soils/geology report to LADBS for review and approval as part of the application for a grading permit. A previous site-specific liquefaction analysis conducted in 2017 in the vicinity of the BRH building found that the potential for liquefaction to occur at the Site is low.[42] The final soils/geology report would include a liquefaction hazard analysis specific to the subsurface characteristics at the location of the proposed new SNF building and site- and Project-specific design and construction considerations with regard to ground failure that the Project contractor would be required to implement. Review and approval of the final soils/geology report and design considerations by LADBS would ensure that development of the Project Site would occur in compliance with building safety requirements, including the California Building Code and the LAMC. As such, the Project would not cause substantial adverse effects involving seismic-related ground failure. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

iv. Landslides?

Less than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rock on steep sloping terrain. Thin regions on the western slopes of a canyon on the parcel across Stadium Way from the Project Site are mapped as potentially susceptible to seismically-induced landslides, however, the Project Site is not mapped as potentially susceptible to seismically-induced landslides, [43] and no landslides are mapped to known to exist within the area proposed for the new SNF building or within the Project Site.[44] In addition, the area proposed for the new SNF building has been previously graded and no steep slopes exist proximate to the development location. Furthermore, compliance with the City Building Code includes incorporation of the Site- and Project-specific design requirements for appropriate cut and fill slopes, excavation characteristics, slope clearance, retaining walls, and general design that are required to be established in the final soils/geology report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the final soils/geology report and with all of the conditions issued by LADBS per their review, which would account for kinematic and slope stability analyses for the Site. As such, the Project would not cause substantial adverse effects involving landslides. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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[42] *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020, page 14.*

[43] *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

[44] *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020, page 15.*

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

Less than Significant Impact. During construction, Project grading and excavation would expose soil for a limited time, allowing for possible wind and water erosion. During grading activities, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. Furthermore, the potential for soil erosion would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, onsite grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 or the LAMC, which addresses grading, excavations, and fills. The Project would also comply with the City's Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion.

During operation, as detailed in response to **Checklist Section X, Hydrology and Water Quality,** the Project would be required to comply with the NPDES standards and the City's Stormwater and Urban Runoff Pollution Control regulations and LID requirements to ensure pollutant loads from the Project Site are minimized for downstream receiving waters. Accordingly, the Project would implement LID BMPs to pre-treat/re-use the first flush from the Project Site to protect local water resources to the maximum extent practicable. Specifically, the Project would be required to prepare a LID Plan showing the incorporation of onsite BMPs to infiltrate, evapotranspirate, capture and use, and/or treat stormwater runoff to the maximum extent feasible. Specific BMPs may include infiltration basins, bioretention, permeable pavement, stormwater capture, planter boxes, and/or vegetated swales, among others. In addition to preventing the discharge of pollution, these LID BMPs also prevent erosion and siltation.

Based on the above, the Project would not result in substantial erosion or siltation during construction or operation as a result of the stringent requirements for the prevention of erosion that the Project would be subject to. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Potential impacts with respect to liquefaction and landslide potential are evaluated in **Checklist Questions VI(a.iii) and (a.iv)** above. As detailed above, the Project would not result in loss, injury, or death related to landslide or liquefaction. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is not identified as being located in an oil field or within an oil drilling area. Additionally, the Project itself does not propose direct withdrawal or injection of fluid into the subsurface soils beneath the Site. Furthermore, as previously discussed, compliance with the City Building Code includes incorporation of the Site- and Project-specific design requirements for soil stability established in the final soils/geology report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the final soils/geology report and with all of the conditions issued by LADBS per their review, which would account for slope stability at the Site. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. The Geotech Report determined that the subsurface materials at the Project Site have low expansion potential.[45] Furthermore, the Project would be required to comply with the City of Los Angeles Uniform Building Code, the Los Angeles Municipal Code, and other applicable building codes which include building foundation requirements appropriate to Site-specific conditions, such as expansion potential, established in the final soils/geology report that has would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the final soils/geology report and with all of the conditions issued by LADBS per their Approval Letter. As such, the Project would not risk life or property resulting from expansive soil. Therefore, no impacts would occur and no mitigation measures would be necessary.

Mitigation Measures

None required.

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[45] *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020, page 8.*

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 in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Although there are no known paleontological resources within the Project Site,[46] the Site and surroundings are within an area identified as having bedrock where fossils are likely to be found.[47] In addition, several fossil localities occurring in the same subsurface deposits have been identified in the vicinity of the Project Site, the nearest of which was fossilized fish (*Thyrsocles kriegeri*) encountered approximately 104 feet below the ground surface near the intersection of San Fernando Road and Humbolt Street, 1.4 miles to the east.[48] Portions of the Project Site and the vicinity have been previously disturbed and developed and no paleontological finds have been identified. However, the proposed new SNF building would contain a basement level that would require deeper excavation into native soils that may contain paleontological resources than previously performed at the Site. The Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources should they be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources."[49] Pursuant to the requirement of the Conservation Element, the City has established the following standard condition of approval related to paleontological resources: in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant

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46 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, page 2.15-4.*

47 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles, page 2.15-5.*

48 *Letter from Alyssa Bell, Ph.D., Natural History Museum of Los Angeles County, re: Paleontological resources for the Barlow Respiratory Hospital Project, November 19, 2021.*

49 *City of Los Angeles, General Plan, Conservation Element, Adopted September 26, 2001, page II-5.*

and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. As such, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Less than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds.

Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. The City has adopted the LA Green Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. Through required implementation of the LAGBC, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs.

CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions. Because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts

on the environment. The Climate Change Scoping Plan approved by the California Air Resources Board; the City's LA Green Plan; and Sustainable City pLAn all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill (AB) 32) and the Global warming Solutions Act (also known as Senate Bill (SB) 32). Thus, the Lead Agency has determined that the Project would not have a significant effect on the environment if the Project is found to be consistent with AB 32/SB 32 and SB 375 (through demonstration of conformance with the 2020–2045 RTP/SCS) and the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 Climate Change Scoping Plan, and the Sustainable City pLAn/L.A.'s Green New Deal. The Project's consistency with these applicable regulatory plans and policies is discussed in threshold (b) below.

However, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water/wastewater, and construction equipment. The following provides the methodology used to calculate the Project-related GHG emissions and the Project impacts.

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. CalEEMod Version 2020.4.0 was used to calculate the GHG emissions from the Project. The CalEEMod Annual Output for year 2024 for the Project, is available in **Appendix A**, of this document. Each source of GHG emissions is described in greater detail below.

Table VIII-1
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	1.30
Energy Usage (Electricity & Natural Gas)	161.57
Mobile Sources (Motor Vehicles)	424.64
Solid Waste Generation	17.35
Water/Wastewater	37.46
Construction Emissions	16.77
Project Total	**659.08**

*Calculation sheets are provided in **Appendix A** of this document.*
Source: CalEEMod Version 2020.4.0 for Opening Year 2024 for the Project.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. The Project would comply with SCAQMD Rule 1113. SCAQMD Rule 1113 states that paints applied to building envelope are limited to 50g/L VOC content. No changes were made to the default area source emissions.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.[50]

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the Project. The vehicle trips associated with the Project have been analyzed based on the Project trip generation rates and VMT data. As discussed in Section XVII of this document, the Project would generate a total of 399 daily trips with incorporation of TDM measures. Based on the data in the Transportation Assessment, with incorporation of TDM measures, the Project would not result in any significant VMT transportation impacts.

Emissions of GHGs associated with mobile sources from operation of the Project are based on the average daily trip rate, trip distance, the GHG emission factors for the mobile sources, and the Global Warming Potential (GWP) values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the South Coast Air Basin as provided in EMFAC2017 and CalEEMod. Annual mobile source GHG emissions in units of MTCO2e are generally calculated as follows:

Annual Emissions [MTCO2e] = (Σi (Units × ADT × DTRIP × Days × EF × GWP)i) ÷ 2204.6

Where:

Units = Number of vehicles (same vehicle model year and class)
ADT = Average daily trip rate [trips/day]
DTRIP = Trip distance [miles/trip]
Days = Number of days per year [days/year]
EF = GHG emission factor [pounds per mile]
GWP = Global warming potential [CO_2 = 1, CH_4 = 25, N_2O = 298]
2204.6 = Conversion factor [pounds/MT]
i = Summation index

Waste

Waste includes the GHG emissions generated from the processing of waste from the Project as well as the GHG emissions from the waste once it is interred into a landfill. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion

[50] *No changes were made to the CalEEMod default energy use settings. The baseline for the current CalEEMod energy use defaults is 2019 Title 24 Standards*

rate of approximately 76 percent by year 2012.[51] AB 341 requires that 75 percent of waste be diverted from landfills by 2020. It is anticipated that the Project would recycle at least 50 percent of its solid waste. However, to be conservative, no reduction was taken. No other changes were made to the default waste parameters.

Water/Wastewater

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. No changes were made to the default water usage parameters.

Construction

The construction-related GHG emissions were also included in the analysis and were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The construction-related GHG emissions were calculated by CalEEMod.

The GHG emissions have been calculated based on the parameters as described in Section III above. A summary of the results is shown below in **Table VIII-1, Project-Related GHG Emissions**, and the CalEEMod Model run for the Project is provided in **Appendix A** of this document. **Table VIII-1** shows that the total for the Project's emissions would be 659.08 $MTCO_2e$ per year.

As stated above, because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

As set forth above, the Project would generate incrementally increased GHG emissions over existing conditions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. As discussed under threshold b) below, the Project would be consistent with the 2020–2045 RTP/SCS, the Climate Change Scoping Plan, and the Sustainable City pLAn/L.A.'s Green New Deal. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of project design features discussed in other sections of this IS/MND, would minimize the Project's GHG emissions. Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts with respect to GHGs would be less than significant. No mitigation measures would be required.

Mitigation Measures

None required.

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[51] *City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.*

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

Less than Significant Impact. A significant air quality impact may occur if a project is not consistent with the AB32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

Applicable plans adopted for the purpose of reducing GHG emissions include the CARB Scoping Plan (2008 and 2017 Scoping Plans), the City of Los Angeles Sustainable City pLAn, and the 2016/2020 RTP/SCS discussed below.

Consistency with CARB Scoping Plan

CARB's Scoping Plan identifies strategies to reduce California's GHG emissions in support of Assembly Bill ("AB") 32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation.

Reduction measures are grouped into 18 action categories, as follows:

California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions. 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.

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.

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).

Renewables Portfolio Standards. Achieve 50 percent renewable energy mix statewide by 2030.

Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.

Regional Transportation-Related GHG Targets. Develop regional GHG emissions reduction targets for passenger vehicles.

Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.

Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.

Million Solar Roofs Program. Install 3,000 megawatts of solar-electric capacity under California's existing solar programs.

Medium- and Heavy-Duty Vehicles. Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010.5 Future, yet to be determined improvements, includes hybridization of MD and HD trucks.

Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG 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.

High Speed Rail. Support implementation of a high-speed rail 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.

High Global Warming Potential Gases. Adopt measures to reduce high warming global potential gases.

Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.

Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration was 5 million $MTCO_2e$/yr.

Water. Continue efficiency programs and use cleaner energy sources to move and treat water.

Agriculture. In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program was made mandatory in 2020.

Table VIII-2, Scoping Plan Consistency Summary, summarizes the Project's consistency with the State Scoping Plan. As summarized, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping. As shown above, the Project would be consistent with the applicable measures established in the Scoping Plan.

Table VIII-2
Scoping Plan Consistency Summary

Action	Supporting Measures	Consistency
Cap-and-Trade Program	--	**Not Applicable**. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect commercial/residential projects.
Light-Duty Vehicle Standards	T-1	**Not Applicable**. This is a statewide measure establishing vehicle emissions standards.

Table VIII-2
Scoping Plan Consistency Summary

Action	Supporting Measures	Consistency
Energy Efficiency	E-1 E-2 CR-1 CR-2	**No Conflict**. The Project would include a variety of building, water, and solid waste efficiencies consistent with 2019 CALGREEN requirements.
Renewables Portfolio Standard	E-3	**Not Applicable**. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	**Not Applicable**. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related Greenhouse Gas Targets	T-3	**Not Applicable.** This is a statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	**Not Applicable**. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5 T-6	**Not Applicable**. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are yet to be implemented and would be voluntary, the proposed Project would not interfere with their implementation.
Million Solar Roofs (MSR) Program	E-4	**Not Applicable**. The MSR program sets a goal for use of solar systems throughout the state as a whole. The project currently does not include solar energy generation, and it is unknown if the building roof structure would be designed to support solar panels in the future.
Medium- & Heavy-Duty Vehicles	T-7 T-8	**Not Applicable**. MD and HD trucks and trailers accessing the Project would be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the Project would interfere with implementation of these requirements and programs.
Industrial Emissions	I-1 I-2 I-3 I-4 I-5	**Not Applicable**. These measures are applicable to large industrial facilities (> 500,000 $MTCO_2e$/yr) and other intensive uses such as refineries.
High Speed Rail	T-9	**Not Applicable**. Supports increased mobility choice.
Green Building Strategy	GB-1	**No Conflict**. The Project would include a variety of building, water, and solid waste efficiencies consistent with CALGREEN requirements.
High Global Warming Potential Gases	H-1 H-2 H-3 H-4 H-5 H-6 H-7	**Not Applicable**. The proposed Project is not a substantial source of high GWP emissions and would comply with any future changes in air conditioning, fire protection suppressant, and other requirements.

Table VIII-2
Scoping Plan Consistency Summary

Action	Supporting Measures	Consistency
Recycling and Waste	RW-1 RW-2 RW-3	**No Conflict**. The Project would recycle a minimum of 50 percent diversion to recycling from construction activities and operations pursuant to AB 939, AB 341, and AB 75 requirements.
Sustainable Forests	F-1	**No Conflict**. The Project would increase carbon sequestration by increasing on-site trees per the Project landscaping plan.
Water	W-1 W-2 W-3 W-4 W-5 W-6	**No Conflict**. The Project would include use of low-flow fixtures and water-efficient landscaping pursuant to CalGreen requirements.
Agriculture	A-1	**Not Applicable**. The Project is not an agricultural use.
Note: Supporting measures can be found at the following link: https://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf *Table Source: EcoTierra Consulting, 2022.*		

Consistency with SB 32

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05, to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed above, is consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 target are too far in the future to define in detail." In the First Scoping Plan Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; largescale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."

Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively, the 2050 target of Executive Order S-3-05 has not been codified, so the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (Cleveland National). The case arose from San Diego Association of Governments (SANDAG's) adoption of its 2050 Regional Transportation Plan,

which included its Sustainable Communities Strategy, as required by SB 375. On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, since the Project is much smaller in size and scope in comparison to the Regional Transportation Plan examined in Cleveland National, assessing the Project's consistency with regard to the 2050 target of Executive Order S-3-05 is not necessary for determining compliance with CEQA.

The 2017 Scoping Plan builds on the 2008 Scoping Plan in order to achieve the 40 percent reduction from 1990 levels by 2030. Major elements of the 2017 Scoping Plan framework that will achieve the GHG reductions include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing Zero Emission Vehicle (ZEV) buses and trucks. When adopted, this measure would apply to all trucks accessing the Project site; this may include existing trucks or new trucks purchased by the project proponent, which could be eligible for incentives that expedite the Project's implementation of ZEVs.
- Low Carbon Fuel Standard (LCFS), with an increased stringency (20 percent by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
- Implementing SB 350, which expands Renewables Portfolio Standard (RPS) to 50 percent and doubles energy efficiency savings by 2030. When adopted, this measure would apply when electricity is provided to the Project by a utility company.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. When adopted, this measure would apply to all trucks accessing the Project Site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
- Post-2020 Cap-and-Trade Program that includes declining caps. When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
- 20 percent reduction in GHG emissions from refineries by 2030. When adopted, the Project would be required to comply with this measure if it were to utilize any fuel from refineries.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink. This is a statewide measure that would not apply to the Project.

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.[52]

LA Sustainable City pLAn

While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The 2019 L.A. New Green Deal is the first four-year update to the Sustainable City pLAn. It augments, expands, and elaborates in more detail the City's vision for a sustainable future and it addresses the climate emergency with accelerated targets and new aggressive goals. The Project would contribute towards the attainment of the aspirations and goals previously identified in the Regulatory Framework discussion above by:

- Obtaining power from a utility provider that supplies 55% renewable energy by 2025.
- Including components that will reduce building energy use per square foot 22% by 2025.
- Reducing Vehicle Miles Traveled per capita by at least 13% by 2025.
- Ensuring 57% of new housing units are built within 1,500 feet of transit.

The proposed Project would use energy from the Los Angeles Department of Water and Power (LADWP), which currently provides 34 percent of electricity via renewable sources but has committed to providing an increasing percentage from renewable sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The proposed Project would be designed and constructed to meet LA Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The proposed Project would include Energy Star® appliances where applicable and would be a modern development with energy efficient heaters and air conditioning systems. As such, the proposed Project would be consistent with the goals and initiatives in the L.A. Green New Deal.

A discussion of the Project's consistency with the Sustainable City pLAn targets is provided below in **Table VIII-3, Project Consistency with the LA Sustainable City pLAn**.

Table VIII-3
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Local Water. 20% reduction in water use per capita by 2017; 22.5% by 2025; and 25% by 2035.	**No conflict**. The Project would be consistent with the LAMC to reduce water consumption by 20 percent. The Project is required to follow CalGreen Standards which mandates a 20 percent reduction in indoor water use.

[52] *California Legislative Information, Senate Bill No. 32, [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.*

Table VIII-3
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Solar Power. Increase cumulative total megawatts of local solar photovoltaic power to between 900-1,500 megawatts by 2025 and 1,500 to 1,800 megawatts by 2035 as well as increasing the cumulative total megawatts of energy storage capacity to at least 1,654 to 1,750 megawatts by 2025.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, Energy Star appliances, and LED lighting.
Energy Efficient Buildings. Reduce energy use per square foot below 2013 baseline levels for all building types by at least 14% by 2025 and 30% by 2035 and use energy efficiency to deliver 15% of all of the City's projected electricity needs by 2020.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. Project would include, but not be limited to: The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, and high efficiency HVAC systems.
Carbon and Climate Leadership. Reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. Improve GHG efficiency of the City from 2009 levels by 55 percent by 2025 and 75 percent by 2035.	**No conflict.** The Project would be designed to incorporate energy and water efficient design that meet or exceed the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code standards and incorporate energy and water efficiency measures. The Project includes design features and compliance with Code measures that will assist in the reduction of Project-related GHG emissions. Some of these design features include: The Project would include, but not be limited to: enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls would enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair would further enhance the health and wellness of the occupants. Water usage would be minimized via the use of low flow plumbing fixtures throughout the project. The irrigation system shall be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The parking/drop-off area would encourage ridesharing and carpooling, while the on-site parking would include preferential parking for electric and low-emitting vehicles, and the project site already has electric vehicle charging stations.

Table VIII-3
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Waste and Landfills. Increase land fill diversion rates to at least 90 percent by 2025 and 95 percent by 2035, as well as increasing proportion of waste products and recyclable commodities productively reused and repurposed within the County of Los Angeles to at least 25 percent by 2025 and 50 percent by 2035.	**No conflict**. the Project would be required to implement recycling programs that reduce waste to landfills by a minimum of 75 percent (per AB 341). The Project would be served by a solid waste collection and recycling service that may include mixed-waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets. The Project would also comply with the City of Los Angeles Space Allocation Ordinance (171,687) which requires that developments include a recycling area or a room of a specified size on the Project Site.
Housing and Development. Increase cumulative new housing unit construction to 100k by 2021, 150k by 2025, and 275k by 2035. Ensure proportion of new housing units built within 1,500 feet of transit is at least 57 percent by 2025 and 65 percent by 2035.	**Not applicable.** The Project includes construction of a skilled nursing facility. The proposed Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the facility.
Mobility and Transit. Reduce daily VMT per capita by at least 5 percent by 2025 and 10 percent by 2035. Increase the percentage of all trips made by walking, biking, or transit to at least 35 percent by 2025 and 50 percent by 2035.	**No conflict.** The Project is an urban center/infill development located in close proximity to transit. Additionally, the Project is a skilled nursing facility. EV charging stations are already on site. The Project provides 8 short term bicycle parking spaces and 16 long-term bicycle parking spaces, located and configured in compliance with applicable requirements of the LAMC.
Air Quality. Increase the percentage of electric and zero emissions vehicles in the city to 10 percent by 2025 and 25 percent by 2035 as well as increasing the percentage of port-related goods movement trips that use zero-emissions technology to at least 15 percent in 2025 and 25 percent in 2035.	**No conflict**. The Project would comply with applicable City of Los Angeles Building Codes pertaining to building code requirements for charging station prewiring and installation of charging stations at workplaces.
Note: This analysis focuses on the Sustainable City pLAn targets most applicable to the Project. *Source: City of Los Angles Sustainable City pLAn, April 2015 and L.A.'s Green New Deal Sustainable City pLAn 2019.*	

The analysis above describes the consistency of the Project with the City's Sustainable City pLAn. As discussed in **Table VIII-2** and **Table VIII-3**, generally the Project's consistency with the plans and policies should be demonstrated by a combination of regulatory compliance (green building code etc.) as well as Project-specific characteristics (water conservation, energy conservation, and other features consistent with these plans). Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for the reduction of GHG emissions.

As discussed above, the Project would comply with the LA Green Building Code and CALGreen Code which would ensure energy efficiency and installation of water conserving fixtures. Moreover, the Project Site would utilize energy from LADWP, which is actively increasing its use of renewable sources. The Project would locate a skilled nursing facility use close to transit opportunities. The Project Site is located approximately 0.25-mile east of the Sunset/Douglas bus

stop and northeast of the Sunset/Vin Scully-Dodger Stadium bust stop, both for Los Angeles County Metropolitan Transportation Authority ("Metro") Line 2 service with stops every 20 minutes during weekdays and every 30 minutes during weekends and Line 4 service with stops every 10 minutes on weekdays and weekends. In addition, the Project would provide 24 bicycle parking spaces. Therefore, the Project would be consistent with the goals of the LA Green Plan.

City of Los Angeles Sustainable City pLAn

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. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control. It also provides specific targets related to housing and development, as well as mobility and transit, including the reduction of 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 Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s Green New Deal. This latest document establishes targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable city pLAn/Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development that would densify an existing land use within a Transit Priority Area (TPA).

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. The Project would generally comply with these aspirations as the Project is an infill development, which is located near regional and local transit services. The Project would be well-served by transit and would generally further goals to reduce GHG emissions by promoting infill development, density, more efficient transportation, etc. Furthermore, the Project would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project employees. Therefore, the Project would be consistent with the Sustainable City pLAn and the Green New Deal.

LA Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2020 comply with the current Los Angeles Green Building Code as amended to comply with the 2019 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include: electric vehicle chargers already on-site; enhanced energy-efficiency via high-performance glazing as well as enhanced façade, and roof insulation values; low-water use plumbing fixtures/appliances, water-efficient landscaping, and drip irrigation. The Project would comply with the City of Los Angeles' Green Building Ordinance standards and reduce emissions beyond a "Business-as-Usual" scenario.

2020-2045 RTP/SCS

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[53, 54]

On September 1, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020– 2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[55] Applicable Goals and Guiding Principles of the 2020-2045 RTP/STS include:

- Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Enhance the preservation, security, and resilience of the regional transportation system.
- Increase person and goods movement and travel choices within the transportation system.
- Reduce greenhouse gas emissions and improve air quality
- Support health and equitable communities.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS.

Consistent with SCAG's 2020 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand. The Project Site is located within a Transit Priority Area (TPA). As discussed previously, the Project Site is an urban center location close to jobs, off-site housing, shopping, and entertainment uses and in close proximity to public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The 2020 RTP/SCS projects that these urban center/infill areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

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[53] *Southern California Association of Governments, Final 2016-2040 RTP/SCS.*

[54] *Southern California Association of Governments, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance off GHG Quantification Determination, June 2016.*

[55] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- New approximately 80,454 square foot, skilled nursing facility;
- Jobs closer to transit;
- New job growth focused in TPA; and
- Biking and walking infrastructure to improve active transportation options and transit access.

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

The Project would be located in an area well-served by public transit. Specifically, the Project Site is located approximately 0.25-mile east of the Sunset/Douglas bus stop and northeast of the Sunset/Vin Scully-Dodger Stadium bust stop, both for Metro Line 2 service with stops every 20 minutes during weekdays and every 30 minutes during weekends and Line 4 service with stops every 10 minutes on weekdays and weekends. The Project would include bicycle facilities and create a pedestrian-friendly environment by providing landscaped walkways. The Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the area. The Project would not conflict with RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation.

As demonstrated above, the Project would be consistent with the applicable goals, including those pertaining to reductions in GHG emissions, in the 2020 RTP/SCS.

The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Project-specific impacts with respect to GHG emissions would be less than significant, and no mitigation is required.

Cumulative Impacts

A cumulatively considerable impact would occur where the impact of the Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to

California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. Given that the analysis above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would also be considered less than significant.

Mitigation Measures

None required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

A Phase I Environmental Assessment (Environmental Assessment) of the Project Site was prepared by Rincon Consultants, Inc. in November 2020.[56] The Environmental Assessment included a review of environmental regulatory databases, aerial photographs, and topographic and fire insurance maps, as well as a reconnaissance survey of existing conditions of the Site. The Environmental Assessment was prepared in order to identify potential recognized environmental conditions (REC), controlled RECs, historical RECs, and de minimus conditions associated with the Project Site. Pursuant to American Society of Testing and Materials (ASTM) E1527-13:

- A REC is defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; 3) under conditions that pose a material threat of a future release to the environment."
- A controlled REC is defined as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."
- An historical REC is defined as "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by regulatory authority, without subjecting the property to any required controls (for example, use restrictions, activity and use limitations, institutional controls, or engineering controls)."
- A de minimus condition is defined as "a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimus conditions are not recognized environmental conditions nor controlled recognized environmental conditions."

The following analysis of potential hazards and hazardous materials impacts of the Project is based, in part, on the Environmental Assessment, included as **Appendix G** to this IS/MND, and its findings, conclusions, and recommendations are incorporated by reference herein.

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. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, standard construction BMPs for the use and handling of such materials would be implemented to avoid or reduce the potential for associated hazards to occur. Any use of

[56] *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020.*

potentially hazardous materials during construction of the proposed Project would comply with all local, state, and federal regulations regarding the handling of potentially hazardous materials. Furthermore, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Based on the age of Building 26, asbestos-containing materials (ACMs) and lead-based paint (LBP) may be present. However, the Project would be subject to existing regulatory compliance with regards to the removal, transport, and disposal of ACMs and LBP that may be within the existing structure. In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found within Building 26, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6(c), Code of Federal Regulations, Title 29, Section 1926.1101(b), Code of Federal Regulations, Title 40, Part 61, Subpart M, and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1. Adherence to the regulations and procedures would ensure that all ACMs and LBP would be remediated and disposed of in accordance with federal, state, and local regulations.

The use and disposal of hazardous materials associated with operations of the SNF building would not differ dramatically in type and quantity from existing operations (e.g., mercury, pharmaceuticals, radiologicals, sterilants and disinfectants, cleaning solvents, laboratory chemicals, and pesticides for landscaping), none of which are currently considered environmental concerns. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Medical waste generated would continue to be managed in accordance with a Medical Waste Management Plan in compliance with California Department of Public Health standards. Medical waste would continue to be transported offsite by a licensed transporter for appropriate disposal on a regular basis.

Based on the above, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (vehicle fuels, paints, oils, and transmission fluids) occur, if ACMs and LBP that may be

encountered in Building 26 are not properly handled and disposed of, or if contaminated soils and/or groundwater are encountered during excavation and proper erosion controls are not implemented. The Project could also release hazardous materials into the environment during operation is spills or emissions of hazardous materials required for normal operation (mercury, pharmaceuticals, radiologicals, sterilants and disinfectants, cleaning solvents, laboratory chemicals, and pesticides) occurs.

Construction

During construction, standard construction BMPs for the use and handling of hazardous materials required for construction would be implemented to avoid or reduce the potential for spills and releases pursuant to local, state, and federal regulations. In addition, the Project would be subject to existing regulatory compliance with regards to the removal, transport, and disposal of ACMs and LBP that may be within Building 26. As previously discussed, an Environmental Assessment of the Project Site was prepared to identify potential RECs associated with the Project Site that may indicate the release of contaminants within the soil and groundwater beneath the Site. The Environmental Assessment identified potential RECs associated with: previous and an existing onsite laundry building; an existing onsite UST; an existing onsite emergency generator; an existing onsite hydraulic trash compactor; previous onsite agricultural use; and previous offsite agricultural use to the east. Evaluations and conclusions regarding these potential RECs are discussed below:

Onsite laundry building. According to the historical resources reviewed, an onsite laundry building was present along the Project Site's western boundary from as early as 1919 until at least 1970. The building is existing today; however, onsite laundry operations have relocated to the central portion of the Project Site. Volatile organic compounds are typically associated with dry cleaners; however, the facility was not identified as a dry cleaner in other historical sources reviewed. Based on the lack of evidence the facility was utilized as a dry cleaner, the onsite laundry building is considered a *de minimis* condition.[57]

Onsite UST. According to environmental regulatory databases, the Project Site is associated with a UST. No additional information was available in the environmental regulatory databases. A 3,000-gallon diesel UST is located north of the main hospital building, on the southern side of the Birge Hall. The UST supports the onsite emergency generator. A monitoring system is in place for the UST and there have been no known releases of fuel. Previous environmental assessment of the Project Site concluded that the continued operation of the UST in accordance with all local and state regulations and with the utilization of the leak detection monitoring system does pose any known hazard to the public or the environment.[58] The Environmental Assessment prepared for the Project Site in conjunction with the Project also did not recommend any further assessment of the UST.[59]

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[57] *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 23.*

[58] *Citadel Environmental Services, Inc., Phase I Environmental Site Assessment Report: Barlow Respiratory Hospital, page 5 as included in City of Los Angeles, Barlow Hospital Replacement and Master Plan Project, Draft EIR, April 2012, page IV.F-11.*

[59] *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 23.*

Onsite emergency generator. During the site reconnaissance, an emergency generator was observed southeast of the Bosworth building, north of the existing parking areas in the central portion of the Project Site. No indications of release were observed from the emergency generator. Therefore, the onsite emergency generator on the Project Site is considered a *de minimis* condition.[60]

Onsite hydraulic trash compactor. During the site reconnaissance, a hydraulic trash compactor was observed next to the emergency generator. Minor staining was observed on the ground surrounding the trash compactor. However, the trash compactor and surrounding concrete appear to be in good condition. Therefore, the onsite hydraulic trash compactor on the Project Site is considered a *de minimis* condition.[61]

Former agricultural uses of the Project Site. According to the historical resources reviewed, the Project Site appears to have been used for agricultural purposes from as early as 1977 through at least 1994. One possible orchard was present in the southeastern portion of the property from 1977 to 1979 and one possible orchard was present in the central portion of the property from 1989 and 1994. Agricultural land use is typically associated with the use of pesticides and arsenic. However, based on Site activities and the size of the possible orchard, the former use of the Project Site for agricultural purposes is considered a *de minimis* condition.[62]

Based on the above, no indications of soil and/or groundwater contamination beneath the Project Site were identified by the Environmental Assessment. Furthermore, the Project would be required to prevent the transport of soil from the Project Site by stormwater runoff and winds through the use of appropriate BMPs pursuant to the requirements of the Project's SWPPP and in compliance with the latest NPDES Stormwater Regulations. As further detailed in **Checklist Section X, Hydrology and Water Quality**, if groundwater were encountered during construction, temporary pumps and filtration would be used in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations during construction.

Operation

As previously discussed, the use and disposal of hazardous materials associated with operations of the SNF building would not differ dramatically in type and quantity from existing operations and use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Medical waste would continue to be managed in accordance with a Medical Waste Management Plan in compliance with California Department of Public Health standards and transported offsite by a licensed transporter for appropriate disposal on a regular basis. In addition, the Project Site is not located within a Methane Zone or Methane Buffer Zone[63] and would, therefore, not experience methane seepage.

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60 *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 23.*

61 *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 23.*

62 *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, pages 23 - 25.*

63 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

Conclusions

Based on the above, the Project would not encounter contaminated soil and/or ground water during construction and construction and operation would be subject to federal, state, and local regulations regarding the handling, storage, use, transport, and disposal of hazardous materials. As such, the Project would not 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. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located within 0.25-mile of the Project Site; the nearest school is Downtown Magnet High School (1081 W. Temple Street), located approximately 0.7-mile south of the Project Site. As such, the Project would not emit or handle hazardous materials, substances, or waste within 0.25-mile of a school. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. California Government Code Section 65962.5 requires various State agencies 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. A records review conducted as part of the Environmental Assessment found that the Project Site is listed on 10 government databases of hazardous materials sites as Barlow Respiratory Hospital (2000 Stadium Way) and 3 databases as Chris Brownlie Hospice (1300 Scott Avenue) as detailed in **Table IX-1, Project Site Hazardous Materials Database Search Results**.[64]

[64] *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 8.*

Table IX-1
Project Site Hazardous Materials Database Search Results

Database	Comments
Barlow Respiratory Hospital	
RCRA NonGen/NLR	The facility is listed as a non-generator that does not presently generate hazardous waste.
HAZNET	The facility disposed of various hazardous waste in the years 1988, 1990, 1991, 1994 through 1999, 2002, through 2010, 2013, 2014, 2015, and 2017, including asbestos containing waste, waste oil and mixed oil, and unspecified oil-containing waste
HWTS	The facility is classified as a general medical and surgical hospital and has been inactive as of 2000.
EMI	The facility is listed as active under the South Coast Air Quality Management District.
UST	The facility is associated with an underground storage tank.
FINDS	Database reveals no pertinent information.
CERS HAZ WASTE/CERS TANKS/CERS	The facility is classified as a hazardous waste generator, a chemical storage facility, and is associated with an underground storage tank. Violations have been reported, but the facility has since returned to compliance.
HAZMAT	The status of the facility is listed as active.
ECHO	The facility is listed as active under the Resource Recovery and Conservation Act.
Chris Brownlie Hospice	
RCRA-SQG	The facility is classified as a small-quantity generator of hazardous waste.
FINDS	Database reveals no pertinent information.
ECHO	Facility is listed as active under the Resource Recovery and Conservation Act.

Source: Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020.

As shown in **Table IX-1**, the Project Site is included on various hazardous materials databases indicating that the facility is classified as a chemical storage facility and has disposed of various hazardous waste. Violations associated with the Project Site's listing on the CERS HAZ WASTE/CERS TANKS/CERS database have been reported, however the Project Site has returned to compliance and the Environmental Assessment did not indicate that the previous violations represent a REC at the Site. The Project Site is also identified as containing a UST. As detailed in response to **Checklist Question IX(B)**, the UST is a 3,000-gallon tank located adjacent to the south side of Birge Hall and is used for diesel storage for an onsite generator. Based on the location of the UST, the Environmental Assessment did not recommend additional follow up assessment of the UST.[65] Accordingly, the UST does not represent a REC associated with the Site. As such, the Project would not create a significant hazard to the public or environment as a result of its inclusion on lists of hazardous materials sites. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

[65] *Rincon Consultants, Inc., Phase I Environmental Assessment, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, December 22, 2020, page 23.*

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 any airport's influence area nor within two miles of an existing airport.[66] The nearest airport is the Hollywood Burbank Airport, located approximately 10.5 miles northwest of the Project Site. Therefore, no safety hazards or excessive noise from airports would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is located along Stadium Way, Boylston Street, and Scott Avenue, which are not designated as a Primary or Secondary Disaster Routes; however, Sunset Boulevard in the vicinity of the Project Site is identified as a Secondary Disaster Route.[67] It is expected that Project construction activities and staging areas would remain entirely onsite and would not require temporary street and/or lane closure(s) on Stadium Way, Boylston Street, or Scott Avenue. As discussed in **Checklist Section XVII, Transportation**, in the event that lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with the Construction Management Plan (see PDF TR-1 in **Checklist Section XVII, Transportation**) that would be implemented to ensure adequate emergency access and circulation during construction.

With regards to operation, the Project would not cause permanent alterations to offsite vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would continue to be provided from Stadium Way, Boylston Street, and Scott Avenue as needed and appropriate. The Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As discussed in **Checklist Section XV, Public Services**, the Project's proposed design, including ingress/egress and internal circulation, would be subject to review and approval by the Los Angeles fire and police departments. The Project would introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed under **Checklist Section XVII, Transportation**, the Project would result in less-than-significant traffic impacts. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806.

Based on the above, emergency access to the Project Site and surrounding uses would be maintained at all times. As such, the Project would not impair implementation of or physically

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66 *Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, June 2012, available at: http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf.*

67 *Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, available at: http://dpw.lacounty.gov/dsg/disasterRoutes/map/disaster_rdm-South.pdf.*

interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone.[68] This designation includes "lands designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors."[69] Areas designated within a Very High Fire Hazard Severity Zone are be required to be designed and constructed in accordance with the Los Angeles Fire Code and would be required to incorporate measures to reduce fire risk, such as fire-retardant plantings, vegetation clearance; and sprinkler systems. Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with Los Angeles Fire Department (LAFD) to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Additionally, the Applicant would be required to maintain defensible space per regulation found in the California Public Resources Code 4291 as applicable. Accordingly, the Project would comply with current building codes as well as regulations regarding maintenance of defensible space and would not directly or indirectly expose people or structures to significant risk of loss involving wildland fires. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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[68] *City of Los Angeles Department of City Planning, Zone Information & Map Access System,* available at*: http://zimas.lacity.org.*

[69] *City of Los Angeles Department of City Planning, Zone Information & Map Access System,* available at*: http://zimas.lacity.org, accessed October 3, 2021.*

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or offsite;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Less than Significant Impact. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board ("RWQCB"). Applicable regulations include the NPDES permitting system; the City's Stormwater and Urban Runoff Pollution Control regulations (LAMC Article 4.4); the City's LID requirements (Ordinance No. 183,833), which reduce potential water quality impacts during the construction and operation of a project; and Ordinance 173,494, which

grants LADBS authority to withhold grading and/or building permits unless a project incorporates development BMPs to control stormwater pollution.

Construction

During Project construction, particularly during the grading phase, 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, onsite 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. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a SWPPP under the NPDES Construction General Permit. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook*, *Part A Construction Activities*. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Should the Project require temporary dewatering, temporary pumps and filtration would be utilized in compliance with the NPDES permit. Any such temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, all grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion impacts to acceptable levels. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, would ensure that soil erosion or the loss of topsoil are minimized.

Operation

Stormwater runoff from the Project Site has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (oil/grease, cleaners, and trash). The Project would be required to comply with the NPDES standards and the City's Stormwater and Urban Runoff Pollution Control regulations and LID requirements to ensure pollutant loads from the Project Site are minimized for downstream receiving waters. The ordinances contain requirements for operation of projects to integrate BMPs and LID standards for lessening water quality impacts of development, reducing changes to existing hydrology, and minimizing the percentage of impervious surfaces consistent with the City's landscape ordinance and other related requirements in the City's LID Handbook. Specifically, the Project would be required to prepare a LID Plan showing the incorporation of onsite BMPs to infiltrate, evapotranspirate, capture and use, and/or treat stormwater runoff to the maximum extent feasible. Specific BMPs may include infiltration basins, bioretention, permeable pavement, stormwater capture, planter boxes, and/or vegetated swales, among others. Conformance would be ensured during the City's building plan review and approval process.

Summary

Based on the above, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Historic high groundwater in the vicinity of the Project Site is approximately 20 feet below ground surface, however, subsurface excavations at the Project Site have encountered groundwater at depths ranging from 5 to 23 feet below ground surface.[70] The Project Site does not overlie a groundwater basin,[71] therefore, the groundwater beneath the Project Site is considered perched groundwater, with no hydrologic connection to a regional groundwater source. Construction and operation of the Project would use a municipal water supply and do not propose the use of any wells or other means of extracting groundwater for water supply use. During construction, temporary dewatering may be required, however, due to the temporary nature of construction activities and because the groundwater that may be extracted by the Project is not hydrologically connected to a regional groundwater basin, dewatering activities would not have the potential to decrease groundwater supplies. During operation, potable water would be supplied by the LADWP, which draws water supplies from distant sources and which conducts its own assessments and mitigation of potential environmental impacts. The Project does not propose permanent dewatering. Furthermore, although the Project would increase the amount of impervious cover at the Site through the addition of the SNF building, internal roadways, and parking areas, a substantial portion of the proposed development would occur in areas currently covered by impervious surfaces (parking areas and internal roadways) and the majority of the Project Site's 10.68 acres would remain open space with no impervious cover. As such, the Project would not substantially decrease groundwater supplies or interfere with groundwater management. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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70 *Leighton Consulting, Inc., Geotechnical Evaluation Report, Proposed Skilled Nursing Facility, Barlow Respiratory Hospital, 2000 Stadium Way, Los Angeles, California, November 24, 2020, page 9.*

71 *California Department of Water Resources, Sustainable Groundwater Management Act Basin Prioritization Interactive Map, available at: https://gis.water.ca.gov/app/bp-dashboard/final/, accessed November 26, 2021.*

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 offsite;

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

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Less than Significant Impact. Project construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments and pollutants from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Storm Water Pollution Prevention Plan (SWPPP), which must be acceptable to the City and in compliance with the NPDES Stormwater Regulations. In addition, as detailed in response to **Checklist Question X(a),** the Project would be required to implement LID BMPs pursuant to NPDES standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494). In addition to ensuring that pollutant loads from the Project Site are minimized for downstream receiving waters, LID BMPs also control the amount of surface water runoff leaving the Project Sites during a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period.

Due to the stringent controls imposed under the NPDES Permit, including preparation of a SWPPP for construction activities and implementation of LID BMPs during operation, the Project would not alter the existing drainage pattern of the Project Site in a manner that would result in erosion, flooding, exceedance of storm drainage systems, or provide sources of polluted runoff. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

iv. Impede or redirect flood flows?

Less than Significant Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for

areas of minimal flooding.[72] In addition, no watercourses that may overflow or breech a levee are located on or near the Project Site.[73] The Site is not located within a tsunami hazard area or potential inundation area of a dam or flood control basin.[74] As such, the Project would not be expected to encounter flood flows that may be impeded or redirected. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. As detailed above under **Checklist Question X(c)(iv)**, the Project Site is not located within a flood hazard, tsunami, or seiche zone. Furthermore, as discussed in greater detail in **Checklist Section IX, Hazards and Hazardous Materials**, typical hazardous materials utilized by medical facilities (e.g., mercury, pharmaceuticals, radiologicals, sterilants and disinfectants, cleaning solvents, laboratory chemicals, and pesticides for landscaping) would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Water quality control plans applicable to the Project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the

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[72] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1628F, effective September 26, 2008, website: http://msc.fema.gov/portal.*

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

[74] *County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990.*

governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL)[75] Implementation Plans and Watershed Management Plans.

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, construction of the Project would prevent the spread of contaminants into groundwater through compliance with all relevant NPDES requirements related to discharges from dewatering operations and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the NPDES Permit, including implementation of an SWPPP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the use and disposal of hazardous materials associated with operations of the SNF building would not differ dramatically in type and quantity from existing operations. While the development of the new SNF building would slightly increase the use of onsite hazardous materials, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically overdrafted basins until 2020) to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically overdrafted basins) to achieve groundwater sustainability.

The Project Site does not overlie a groundwater basin.[76] As previously discussed, construction may encounter groundwater, however, the groundwater beneath the Project Site is considered perched groundwater that is not connected to a regional groundwater source. As such, dewatering activities required by the Project would not reduce regional groundwater supplies. Operation of the Project would not require permanent dewatering; therefore, the extraction of groundwater would not be required. Additionally, the Project would not have the potential to impact the amount of groundwater recharge as the new SNF building would be constructed on a portion of the Site that is currently largely covered with impervious parking surfaces and the majority of the Project

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[75] *Total Maximum Daily Load (TMDL)is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.*

[76] *California Department of Water Resources, Sustainable Groundwater Management Act Basin Prioritization Interactive Map, available at: https://gis.water.ca.gov/app/bp-dashboard/final/, accessed November 26, 2021.*

Site's 10.6 acres would remain open space with no impervious cover. Furthermore, the Project would receive its water from the LADWP. Both the LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Furthermore, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando Valley Basin. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years. As described in detail in **Checklist Question XIX(b),** the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Physically divide an established community?

Less than Significant Impact. The Project Site is currently improved with the BRH. Accordingly, it will not divide an established community. Therefore, related impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Regionally, the Project Site is located within the planning area of SCAG, the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. As the Project proposes a 150-patient bed skilled nursing facility, the Project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206(b)(2)(D); therefore, no further analysis of SCAG consistency is required. The Project is also located within the regional planning area of the SCAQMD AQMP. As evaluated in **Checklist Section III, Air Quality**, the Project is consistent with the AQMP, and no further analysis is required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of local land use plans and the zoning ordinance, discussed below.

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Silver Lake—Echo Park—Elysian Valley Community Plan Area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table XI-1, Project Consistency with the Framework Element**. Applicable objectives and policies for the Project begin with Objective 3.1. As shown, the Project would be consistent with the applicable objectives and policies.

Table XI-1
Project Consistency with the Framework Element

Objective/Policy [1]	Project Consistency
Distribution of Land Uses	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors	**Consistent.** The Project would expand the existing BRH campus through the construction of a new SNF in the southern portion of the existing campus. The Project would increase the diversity of uses by providing a SNF in the immediate area.
Land Use Chapter	
Objective 3.17: Maintain significant historic and architectural districts while allowing for the development of economically viable uses.	**Consistent.** As discussed in greater detail in response to **Checklist Section V, Cultural Resources**, the Project would not directly impact the HCM/Historic District and is consistent with the Secretary's Standards.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** All proposed improvements associated with the Project would occur on the existing BRH property. Additionally, the BRH campus is accessible from Sunset Boulevard, which is a major transportation corridor, and close to several freeways. Public transit is available in the surrounding vicinity.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent:** The Project would develop a currently underutilized portion of the BRH site with a new SNF that would be constructed to the latest resource-efficient requirements of the LA Green Building Code, thereby improving the quality of life and aesthetic quality of the public realm.
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 continuous visible and non-visible presence of employees and patients at all times of the day would provide a sense of security during evening and early morning hours. Project features intended to enhance safety on the Project Site include maintaining open space areas and visual sightline corridors on the Project Site; and illuminating outdoor common areas, pedestrian walkways, and parking areas on the Project Site.

1 City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.
Source (table): EcoTierra Consulting, November 2021.

Silver Lake—Echo Park—Elysian Valley Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Silver Lake—Echo Park—Elysian Valley Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. This current Community Plan sets forth planning goals and objectives to maintain the community's distinctive character.

As set forth in the Community Plan, the Project Site is designated for Open Space, which allows for the discontinued use of said space through the approval of a Conditional Use Permit (CUP).[77] The BRH operates under a CUP and the Project Site is an improved area of the BRH property. Therefore, the Project would be consistent with this land use designation. The Project's consistency with the applicable objectives and policies of the Silver Lake—Echo Park—Elysian Valley Community Plan is presented in **Table XI-2, Project Consistency with the Silver Lake—Echo Park—Elysian Valley Community Plan**. As shown, the Project would be consistent with the applicable objectives and policies.

Table XI-2
Project Consistency with the Silver Lake—Echo Park—Elysian Valley Community Plan

Objective/Policy [1]	Project Consistency
Chapter III. Land Use Policies and Programs	
Objective 1-5: Preserve and enhance neighborhoods with distinctive and significant historic or architectural character.	**Consistent.** The Project proposes to add additional needed facilities to the existing BRH campus through the construction of a new SNF in the southern portion of the existing campus. The Project proposes a number of architectural design features intended to ensure compatibility with Project Site's architectural heritage, including building articulation and modulation at regular intervals. Ultimately, the Project is expected to be constructed in accordance with conditions set forth in the Letter of Determination issued by the Department of City Planning..
Goal 8: A community with adequate police facilities and services to protect the community's residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services.	**Consistent.** As discussed in **Checklist Section XV.b, Police Protection**, of this document, the Project would be designed in accordance with the requirements of the Los Angeles Police Department (LAPD). Property taxes, sales taxes and special revenue taxes provided as a result of the implementation of the Project would provide funds to offset the impacts of the proposed Project on the LAPD.
Goal 9: Protect the community through a comprehensive fire and life safety program.	**Consistent.** As discussed in **Checklist Section XV.a, Fire Protection**, of this document, the Project would be designed in accordance with the requirements of the Los Angeles Fire Department (LAFD). Additionally, the Project would provide adequate access, fire hydrants, and water pressure. Property taxes, sales taxes and special revenue taxes provided as a result of the implementation of the Project would provide funds to offset the impacts of the proposed Project on the LAFD.
Goal 11: Encourage alternative modes of transportation to the use of single occupant vehicles (sov) in order to reduce vehicular trips.	**Consistent.** There are opportunities for visitors and employees of the Project to use alternative transportation. Public transit is available in the surrounding vicinity.

[77] *City of Los Angeles, General Plan Land Use Map, Silver Lake—Echo Park—Elysian Valley Community Plan, as of June 30, 2013, available at: https://planning.lacity.org/odocument/3cea4f7c-87a0-41af-bcdf-187b9b0bade9/SLKplanmap.pdf, accessed November 2021.*

Table XI-2
Project Consistency with the Silver Lake—Echo Park—Elysian Valley Community Plan

Objective/Policy [1]	Project Consistency
Goal 16-1.1: Assist private owners of existing historic resources and historically or architecturally significant structures to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.	**Consistent.** As discussed in greater detail in response to **Checklist Section V, Cultural Resources**, the Project would not directly impact the HCM/Historic District and is consistent with the Secretary's Standards.
Chapter V. Urban Design	
Commercial Site Planning	
2. Minimizing the number of driveways/curb cuts which provide access from Arterials.	**Consistent**. Vehicular access to the SNF building and new parking lot proposed for the central portion of the Project Site, would be via a driveway just north of the proposed SNF building along Stadium Way. Vehicular access to the second proposed new parking lot to be located north of the Library building would be via an existing driveway mid-block along Stadium Way, thereby minimizing the number of driveways/curb cuts.
7. Providing fully landscaped and maintained unused building setback areas, and strips between driveways and walkways which allow safe and inviting pedestrian access to the rear of properties.	**Consistent.** Total of 114 trees are proposed to be planted in the development area of the Project Site, primarily as screening along Stadium Way and proposed structures, as well as along internal roadways and parking areas. Additionally, the new driveway, located north of the proposed SNF building, would have divided lanes for ingress and egress separated by a landscaped median.
9. Undergrounding new utility service, including Internet services.	**Consistent.** If new utility connections are required the Applicant would place them underground.
10. Screen all mechanical and electrical equipment from public view.	**Consistent.** All mechanical and electrical equipment would be screened from potential public view.
11. Screen all rooftop equipment and building appurtenances from public views.	**Consistent.** All rooftop equipment would be screened from potential public view.
12. Enclose trash areas behind buildings for all projects.	**Consistent.** All trash areas would be enclosed and screened from view within the subterranean parking area.
13. Incorporate design element that enhance safety, including lighting, appropriate security devices, and exposing common areas to view.	**Consistent**. Night lighting for the Project would be provided to illuminate building entrances and driveways, and for security purposes. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn.

1 City of Los Angeles Department of City Planning, Silver Lake—Echo Park—Elysian Valley, adopted August 11, 2004.
Source (table): EcoTierra Consulting, November 2021.

Los Angeles Municipal Code

Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I, the Planning and Zoning Code and Section 12.21A(17). The Project is requesting the following discretionary entitlements, reviews, permits, and approvals:

(1) Pursuant to LAMC Section 17.50, Parcel Map Recordation clearance for subdivision for three parcels and a request to the Advisory Agency for the waiver of dedication and improvements on Stadium Way, Scott Avenue and Boylston Street;

(2) Review pursuant to LAAC Section 22.171.14(b) for alteration to an Historic-Cultural Monument;

(3) Pursuant to LAMC Sections 12.24.M and 12.24.F, Approval of Plans;

(4) Pursuant to LAMC Section 6.05, Site Plan Review for a Project creating more than 50,000 square feet of non-residential floor area;

(5) Pursuant to Building Code Section 91.7003, approval of haul route; and

(6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to, haul route approval, grading permits, excavation permits, foundation permits, and building permits, in order to execute and implement the Project.

The following paragraphs discuss the Project's compliance with the building standards of the LAMC.

Land Use

The Project Site is zoned A1-1VL (Agriculture in Height District 1VL). The BRH was first established as a sanatorium for tuberculosis patients in or about 1901. At such time, the City had not yet adopted a Citywide zoning ordinance to regulate the use and development of properties in the City. The City's zoning ordinance was subsequently adopted in 1921, which did not provide for the use of the Property as a hospital. Accordingly, in 1937, the City adopted Ordinance No. 78709 to allow Barlow to make necessary alterations, additions, and repairs and erect new hospital buildings in the (then) R1 Zone subject to the approval of plans. In accordance with Ordinance No. 78709, the City has since considered Barlow to be a "deemed-approved conditional use" under the jurisdiction of the Zoning Administrator. Barlow Hospital is also the subject of an existing ongoing "blanket variance." The ongoing variance was authorized in Ordinance 78709, as well as City Planning Cases 5421 and 5422 which authorized a "blanket variance…for the erection of such buildings as may be needed" (and which was used to approve hospital improvement plans in 1947, 1948, 1949, and 1961). The City has more recently acknowledged the ongoing variance in ZA 1993-0922, and again in its November 27, 2019 plan approval (ZA-1993-0922-CUZ-PA1; acknowledging a blanket variance for Barlow, which is currently administered as a "deemed approved conditional use" under LAMC Section 12.24F and 12.24M). Subject to the Plan Approval, the Project would be consistent with the zoning regulations governing use of the Project Site.

Floor Area

The Project Site is subject to the FAR requirements of LAMC Section 21.21.1.A which allows a FAR not to exceed 3:1 for Height District 1VL. The Project Site has a buildable land area of 387,055 square feet, which would allow a total of 1,161,165 square feet of development at the Site. With the removal of Building 26 and the addition of the 80,454-square-foot SNF, the Project would result in a total of 163,820 square feet of development at the Project Site for a total FAR of 0.423:1, which would be consistent with the allowed FAR under the LAMC.

Height

Development of the Project Site is regulated by the CUP process established by Ordinance 78709 in 1937, as well as City Planning Cases 5421 and 5422 to facilitate maintenance and expansion of the BRH use. The SNF building would be four stories and 59-feet, 6-inches in lieu of three stories and 45-feet generally required for A1 uses in the A1-1VL zone. The elevation of the site of the proposed SNF building is approximately 12 feet below the general grade of Stadium Way, the SNF building would have a three-story appearance from Stadium Way. Following the Plan Approval, the Project would be consistent with the Project Site zoning under the CUP.

Setbacks

Development of the Project Site is regulated by the Master CUP process established by Ordinance 78709 in 1937, as well as City Planning Cases 5421 and 5422 to facilitate maintenance and expansion of the BRH use. The Project proposes plan approval under the BRH Campus' existing Master CUP for a 15-foot side yard setback along Boylston Street in lieu of the 25-foot yard setback required for A1 uses in the A1-1VL zone; and a 17-foot front yard setback along Stadium Way in lieu of the 25-foot yard setback for A1 uses in the AI-1LV zone. Following the Plan Approval, the Project would be consistent with the Project Site zoning under the CUP.

Parking

The Project would involve the removal, relocation, and re-striping of parking spaces throughout the Project Site. A total of 177 parking spaces currently exists at the Project Site within 9 parking lots and areas striped for parking, including along internal roadways. According to ZA 1993-0922, the existing campus uses have a base parking requirement of 123 parking spaces and pursuant to Los Angeles Municipal Code (LAMC) Section 12.21.A4(d)(5), the proposed SNF use would be required to provide 30 parking spaces, for a total of 153 required parking spaces. The Project would remove 87 existing parking spaces and, through construction of on-grade parking within the SNF building and two proposed new parking lots and re-striping of additional existing lots, would provide 75 new parking spaces. In total, 165 parking spaces would be provided at the Project Site, exceeding the requirement by 12 spaces.

Pursuant to LAMC Section 12.21 A.16.(a)(2), the Project would be required to provide bicycle parking at a ratio of 1 short-term space per 10,000 square-feet and 1 long-term space per 5,000 square-feet. Consistent with the requirements of the LAMC, the 80,454-square-foot Project would provide 8 short-term and 16 long-term bicycle parking spaces for a total of 24 bicycle parking spaces. Long-term bicycle parking spaces would be provided at the service island between the proposed SNF building and the existing Guild House. Short-term bicycle parking spaces would be provided in the on-grade parking area within Floor 1 of the SNF building.

Los Angeles Green Building Code

The current 2020 LA Green Building Code is based on the 2013 California Green Building Standards Code (commonly known as 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 LA Green Building Code:

- All new buildings (residential and non-residential);

- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential)

The Project would meet the requirements in the LA Green Building Code. The building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures (including all bathroom and plumbing fixtures), non-volatile organic compound paints/adhesives, drought-tolerant planting, and high-performance building envelopment.

Summary

As detailed above, with the Plan Approval, the Project would be consistent with the applicable land use plans, policies, and regulations. Furthermore, the Project would be reviewed by numerous City departments, including the Department of City Planning, LADBS, LAFD, BOE, LADBS, and the Department of Transportation, and would be required to comply with all conditions imposed by those agencies in order to be consistent with the applicable department plans and policies. As such, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

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

No Impact. The Division of Oil, Gas, and Geothermal Resources Online Mapping System was reviewed for information pertaining to oil and gas exploration on or nearby the subject property.

No oil wells were identified within 500 feet of the subject property.[78] Additionally, the Project Site is not located within an oil field or oil drilling area,[79] nor within a surface mining district or MRZ-2 zone.[80] The Site is currently designated for Minimum and Low Residential land uses and not for mineral extraction land uses. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Accordingly, the Project would not result in the loss of availability of a known mineral resource of statewide or regional importance. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As detailed in response to Threshold a) above, the Project would have no impact on known mineral resources because the Project Site is not classified as containing significant mineral deposits, is not designated for mineral extraction land uses, and is not located within an oil field or drilling area. The Project Site is not currently zoned for mineral extraction and neither the Site nor the surrounding area are used or designated as potentially available for the extraction of mineral resources. As such, the Project would not result in the loss of availability of a known mineral resource recovery site of local importance. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

[78] *California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Finder Interactive Web Map, available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.24794/34.07564/18, accessed November 2021.*

[79] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.*

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

Less than Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 decibels (dBA) CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

Goal A city where noise does not reduce the quality of urban life.

Objective 1 Reduce airport and harbor related noise impacts.

Objective 2 Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Objective 3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. Office buildings, business, and professional commercial uses, such as the Project, is considered conditionally acceptable with unmitigated exterior noise levels of less than 77 dBA CNEL. For conditionally acceptable exterior noise levels, new construction, or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as HVAC equipment and trash enclosure activity are typically evaluated against standards established under a jurisdiction's Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from commercial noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Section 114.03 prohibits loading or unloading any

vehicle, or operate dollies, carts, forklifts, or other wheeled equipment causing impulsive sound, raucous or unnecessary sound within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M of the following day. Also, Section 114.06 prohibits installation, operation or use of any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.

City of Los Angeles Construction Noise Standards

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) 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. However, the above limitation does not apply where technically infeasible (i.e., the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):
  - are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
  - range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
  - already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Operational Stationary-Source Noise

- If Project-related operational (stationary source) noise levels exceed the exterior ambient noise levels at adjacent sensitive receiver locations by 5 dBA Leq (LAMC § 112.02).

Construction Noise and Vibration

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) 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. However, the above limitation does not apply where technically infeasible (i.e., the noise limitation

cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

The City currently does not have significance criteria to assess vibration impacts during construction. Thus, Federal Transit Administration (FTA) guidelines set forth in FTA's Transit Noise and Vibration Assessment, dated September 2018, are used to evaluate potential impacts related to construction vibration for both potential building damage and human annoyance. The FTA guidelines regarding construction vibration are the most current guidelines and are commonly used in evaluating vibration impacts.

Based on this FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

- Project construction activities cause ground-borne vibration levels to exceed 0.5 PPV at the nearest off-site reinforced-concrete, steel, or timber building.
- Project construction activities cause ground-borne vibration levels to exceed 0.3 PPV at the nearest off-site engineered concrete and masonry building.
- Project construction activities cause ground-borne vibration levels to exceed 0.2 PPV at the nearest off-site non-engineered timber and masonry building.
- Project construction activities cause ground-borne vibration levels to exceed 0.12 PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Based on FTA guidance, construction vibration impacts associated with human annoyance would be significant if the following were to occur (applicable to frequent events; 70 or more vibration events per day):

- Project construction activities cause ground-borne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential and hotel uses.
- Project construction activities cause ground-borne vibration levels to exceed 65 VdB at off-site studio (recording/broadcast) uses.

Existing Noise Level Measurements

To assess the existing noise level environment, four short-term, 15-minute noise level measurements were taken at sensitive receiver locations in the Project study area and shown on **Figure XIII-1, Noise Measurement Locations**. The receiver locations were selected to describe and document the existing noise environment within the Project study area. The 15-Minute Noise Measurement Datasheet (see **Appendix H**) provides the location of the Project site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected on February 8, 2022.

Source: Google Earth, 2022; EcoTierra Consulting, 2022

Noise Measurement Location (NM#)

N

0 250 500 750 1,000

Scale (Feet)

Figure XIII-1
Noise Measurement Locations

Measurement Procedure and Criteria

The noise measurements were taken using the Larson Davis SoundTrack LxT1 sound level meter, which conforms to industry standards set forth in American National Standard Institute (ANSI) S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1, and is consistent with the requirements specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above the ground. The sound level meter was programmed to record the average sound level (Leq) over a period of 15 minutes in accordance with LAMC Section 111.01(a).

Noise Measurement Locations

The short-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the Project Site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects.

This is demonstrated in the Caltrans general site location guidelines which indicate that, "*sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources."* Further, FTA guidance states, *"it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community*."

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before- and after-Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

Noise Measurement Results

The results of the measurements are summarized in **Table XIII-1, Existing Ambient Noise Levels**. The noise monitoring outputs are provided in **Appendix H** of this document.

Table XIII-1
Existing Ambient Noise Levels

Noise Measurement Location	Location	Primary Noise Sources	Noise Levels [a]		
			L_{eq}	L_{max}	L_{min}
NM1	On the BRH campus in proximity to the hospital chapel	Traffic along Stadium Way, hospital staff and groundskeepers, AC units, and aircraft.	49.7	59.9	39.3
NM2	On the BRH campus in proximity to the hospital cafeteria	Traffic along Stadium Way, hospital staff and groundskeepers, and aircraft.	47.4	57.4	41.2
NM3	In the road adjacent to residential use at 1448 N. Boylston Street	Light traffic along Scott Avenue, birds, leaf rustle, aircraft.	55.4	76.3	41.0
NM4	Adjacent to the WW1 memorial along Victory memorial Grove on Elysian Park Drive	Traffic along Stadium Way, pedestrians, and aircraft.	50.0	60.8	44.1

[a] *Noise measurements were taken on February 8, 2022 at each location for a duration of 15 minutes.*
*See **Appendix H** for noise data.*
Source: EcoTierra, 2022.

As shown in **Table XIII-1**, the ambient recorded noise levels range from 47.4 dBA Leq to 55.4 dBA Leq in the Project vicinity. Figure XIII-1 Noise Measurements available in **Appendix H** shows the locations of the noise measurements.

Construction Noise Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project.

The City of Los Angeles General Plan Noise Element defines noise-sensitive uses as: "*single-family and 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*." Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

On-Site Construction Noise

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Demolition
- Grading/Excavation
- Building Construction

- Architectural Coating
- Paving

The Project is anticipated to start demolition no sooner than late November 2022, and construction is anticipated to last approximately 14 months with final buildout occurring around January 2024.

The closest off-site sensitive receptors to the Project Site include:

- The residential uses located approximately 345 feet to the east, south of N. Boylston Street (NM3),
- The residential uses located approximately 390 feet to the west, east of Elysian Park Drive (NM4), and

Other noise sensitive land uses are located further from the Project Site and would experience lower impacts. Several bungalows are located across the street, on the western side of Stadium Way; however, that area is part of the BRH campus and the bungalows look to be derelict and in a state of disrepair (holes in the walls, roofs etc.); therefore, these uses are not included as sensitive receptors as they are not habitable. Construction and demolition noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

A summary of noise level data for a variety of construction equipment compiled by the FTA is presented in **Table XIII-2, Noise Range of Project Construction Equipment.** Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings.

Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. Distances to receptors were based on the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. The highest noise levels during each construction phase at the closest receptors are presented in **Table XIII-2**, and worksheets are included as **Appendix H** to this document.

As defined by the Section 41.40 of the LAMC, a project would normally have a significant impact on noise levels from construction if construction activity (including demolition) or repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, occurs between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, or between 6:00 P.M. and 8:00 A.M. on Saturday. Per Section 112.05 of the LAMC, a significant impact on noise levels from construction could also occur if equipment is operated in a manner that causes it to exceed 75 dBA at a distance of 50 feet, between the hours of 7:00 A.M. and 10:00 P.M.

The above noise level limitations do not apply where compliance is deemed to be technically infeasible, which means that said noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction techniques during the operation of the equipment.

Table XIII-2
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical Use Factor (%)	Typical Noise Level at 50 Feet (Lmax dBA)
Compressor (air)	No	40	78
Concrete Mixer Truck	No	40	79
Concrete Pump	No	20	81
Concrete Saw	No	20	90
Crane	No	16	81
Drill Rig	No	20	79
Dozer	No	40	82
Forklift [a, b]	No	50	61
Front End Loader	No	40	79
Generator	No	50	81
Grader	No	40	85
Haul/Dump Truck	No	40	76
Paver	No	50	77
Pickup Truck	No	50	77
Roller	No	20	80
Tractor/Loader Backhoe	No	40	79
Welder/Torch	No	40	74

a Warehouse & Forklift Noise Exposure - NoiseTesting.info Carl Stautins, November 4, 2014 http://www.noisetesting.info/blog/carl-strautins/page-3/
b Data provided Leq as measured at the operator. Sound Level at 50 feet is estimated.
Source: FHWA RCNM User's Guide, 2006.

The highest unmitigated Project construction noise levels at the nearest sensitive receptors during construction are shown in **Table XIII-3, Unmitigated Construction Noise Levels at Closest Receptor Locations**. As shown in **Table XIII-3**, the highest construction noise levels, which would occur during the grading/excavation phase, would result in less than significant noise levels at the closest off-site sensitive receptor location, NM3, which is located approximately 345 feet to the east, south of N. Boylston Street.

As shown in **Table XIII-3**, construction noise levels at the closest off-site sensitive receptors may reach up to 66.4 dBA Leq during the grading/excavation phase, which would not exceed the 75 dBA construction noise level defined by the Section 41.40 of the LAMC. Therefore, construction noise impacts would be less than significant and no mitigation would be required.

Table XIII-3
Unmitigated Construction Noise Levels at Closest Receptor Locations

Receptor Location [a]	Maximum Unmitigated Construction Noise Levels [b]	Applicable Standard (dBA) [c]	Exceeds Standard?
(NM3) OFFSITE - The residential uses located approximately 345 feet to the east, south of N. Boyston Street	66.4	75	No
(NM4) OFFSITE – The residential uses located approximately 390 feet to the west, east of Elysian Park Drive	63.9	75	No

*a Locations of noise measurements are shown on **Figure XIII-1**.*
*b Construction noise worksheets showing noise levels for all phases of construction are provided in **Appendix H**.*
c The applicable LAMC standard is 75 dBAleq
Source: EcoTierra, 2022.

Off-Site Construction Noise

The highest potential for off-site construction noise is sourced from hauling trips. During the demolition duration of 25 days, the Project would generate approximately 2 haul truck trips per day (1 inbound, 1 outbound) travelling to and from the Project Site. During the grading/excavation duration of 30 days, the Project would generate approximately 12 haul truck trips per day (6 inbound, 6 outbound) travelling to and from the Project Site. The anticipated outbound haul route from the Project Site would be along Stadium Way, to Riverside Drive, to the 5 freeway. Approximately 2,800 cy of soil will be excavated and exported from the Project Site. There are park uses, playgrounds and a few scattered single-family dwellings along the route. Building frontages along the haul route are located approximately 40 feet or more from the roadway center line. As shown in Table 4.17 above, typical noise from haul trucks driving by can reach up to 76 dBA Lmax at a distance of 50 feet. As the residential uses are located along the northern side of Riverside Drive, which is located less than 200 feet from the northbound lanes of the I-5 freeway, the noise level generated by a Project haul truck passing by would be similar to the ambient noise levels at receptor locations along haul route roadway segments. Therefore, impacts from off-site construction noise would be less than significant and no mitigation measures are required.

Operational Noise Impacts

Off-Site Traffic Noise

Existing and Existing Plus Project traffic noise levels were modeled utilizing the Federal Highway Administration (FHWA) Traffic Noise Prediction Model - FHWA-RD-77-108 at a distance of 50 feet from roadway centerline. The uniform distance allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. These worksheets are included as **Appendix H**. The modeling is theoretical, and is considered conservative because it does not account for any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference in with and without Project conditions. Roadway input parameters are based on ADTs, speeds, and vehicle

distribution data. The potential off- site noise impacts caused by an increase of traffic volumes from operation of the Project on the nearby roadways were calculated for the following scenarios:

"Existing" refers to existing year 2022 traffic noise conditions. "*Existing Plus Project"* refers to existing year 2022 traffic noise conditions plus traffic generated by the Project. Both scenarios are demonstrated in **Table XIII-4, Off-Site Traffic Noise Impacts– Existing with Project Conditions**.

Table XIII-4
Off-Site Traffic Noise Impacts – Existing with Project Conditions

Noise Levels 50 feet from Roadway Centerline [a]						
	Existing (2022)		Existing Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant?
Academy Road						
w/o Stadium Way	15,540	69.6	15,570	69.6	0.0	**No**
e/o Stadium Way	5,970	65.5	5,970	65.5	0.0	**No**
Scott Avenue						
w/o Elysian Park Drive	680	56.0	690	56.1	0.1	**No**
e/o Elysian Park Drive	820	56.8	860	57.0	0.2	**No**
w/o Stadium Way	1,280	58.8	1,300	58.8	0.0	**No**
e/o Stadium Way	90	47.2	90	47.2	0.0	**No**
Vin Scully Avenue						
w/o Stadium Way	180	50.3	220	51.1	0.8	**No**
e/o Stadium Way	170	50.0	170	50.0	0.0	**No**
Elysian Park Drive						
n/o Scott Ave	30	42.5	30	42.5	0.0	**No**
s/o Scott Ave	0	0.0	0	0.0	0.0	**No**
Stadium Way						
n/o Academy Road	1,290	58.8	1,300	58.8	0.0	**No**
n/o Scott Ave	120	48.5	130	48.8	0.3	**No**
s/o Scott Ave	14,910	69.4	14,970	69.5	0.1	**No**
n/o Vin Scully Ave	1,220	58.6	1,350	59.0	0.4	**No**
s/o Vin Scully Ave	19,880	70.7	19,890	70.7	0.0	**No**

Notes: ADT = average daily trips, dB = decibels, CNEL = community noise equivalent level
a The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.
Source: EcoTierra, 2022.

A significant impact may occur from traffic noise when the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or

- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

As shown in **Table XIII-4**, Project generated vehicular trips from all of the modeled roadway's segments would result in an increase in ambient noise levels of 0.8 dBA[81] over the Existing scenario, and would not exceed the Noise Element threshold standards presented above. Therefore, traffic noise impacts to off-site receptors due to Project generated trips would be less than significant and no mitigation measures are required.

On-Site Operational Noise

This section analyzes the potential on-site operational noise impacts due to the Project's stationary noise sources.

Parking Noise

The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Activity levels are anticipated to be higher in the early morning and evening when the largest number of employees would enter and exit. However, these events would occur at low exiting and entering speeds, which would not generate high noise levels. During these times, the noise levels can range from 44 to 63 dBA Leq.[82] Operational noise generated by motor vehicles within the Project Site is regulated under the LAMC. Specifically, Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of the property to exceed the ambient noise level by more than five decibels. LAMC Section 114.06 prohibits any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes. LAMC Section 114.03 prohibits loading or unloading of any vehicle, operating any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. of the following day. Onsite receptors are currently exposed to parking activities that would generate similar noise levels to those of the proposed project. The closest offsite residential use is over 300 feet from the parking area and parking activities are anticipated to be inaudible at this distance. Therefore, through compliance with existing LAMC regulations, noise impacts associated with parking would be less than significant and no mitigation measures are required.

Stationary Noise Sources

As part of the Project, HVAC units, and exhaust fans would be installed for the proposed uses. Although the operation of this equipment would generate noise, the design of all mechanical equipment would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering

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[81] *As the increase in noise levels is 0.8 dBA CNEL at 50 feet from the centerline, it would also be an increase of 0.8 dBA CNEL at the property line of affected uses.*

[82] *Source: Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.*

equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels. Therefore, impacts related to stationary noise sources would be less than significant with compliance with existing LAMC regulations. No mitigation measures are required.

Mitigation Measures

None required.

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

Less than Significant with Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Standards

The City's General Plan and Municipal Code do not identify specific vibration level standards. Therefore, applicable vibration standards identified by the Caltrans Transportation and

Construction Vibration Guidance Manual were used in the analysis. The vibration damage criteria adopted by the FTA are shown in **Table XIII-5, Construction Vibration Damage Criteria**.

Table XIII-5
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories:

(1) Vibration Category 1 – High Sensitivity,

(2) Vibration Category 2 – Residential, and

(3) Vibration Category 3 – Institutional.

The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The vibration criteria associated with human annoyance for these three land-use categories are shown in **Table XIII-6, Groundborne Vibration Criteria for General Assessment**. No thresholds have been adopted or recommended for commercial or office uses.

Significance Criteria

Vibration impacts shall be considered significant if any of the following occur as a direct result of the Project:

- If short-term Project generated construction vibration levels exceed the FTA building damage vibration criteria listed in **Table XIII-5** or the FTA human annoyance standards for frequent events listed in **Table XIII-7**.

Table XIII-6
Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events	Occasional Events	Infrequent Events
Category 1	65 VdB	65 VdB	65 VdB
Category 2	72 VdB	75 VdB	80 VdB
Category 3	75 VdB	78 VdB	83 VdB
Per FTA Transit Noise and Vibration Impact Assessment, September 2018, page 8-1, infrequent events are fewer than 30 vibration events of the same kind per day. Occasional events are between 30 and 70 vibration events of the same source per day. Frequent events are more than 70 vibration events of the same source per day. *Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.*			

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Table XIII-7, Construction Equipment Vibration Source Levels identifies various PPV levels for the types of construction equipment that would operate during the construction of the Project. For example, as shown in **Table XIII-7**, a vibratory roller could generate up to 0.21 PPV at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV) at a distance of 25 feet (two of the most vibratory pieces of construction equipment). Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 PPV. It should also be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table XIII-7
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, Table 7-4. September 2018.		

Annoyance to Persons

The primary effect of perceptible vibration is often a concern. However, secondary effects, such as the rattling of a china cabinet, can also occur, even when vibration levels are well below

perception. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is running on a treadmill. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

The nearest off-site buildings are located over 300 feet from the Project Boundary and would not be affected by construction-based vibration. Per the FTA Transportation and Construction Vibration Guidance Manual (May 2018), land uses sensitive to vibration include: buildings where people normally sleep, such as dwelling units, hotels, and hospitals; research and manufacturing facilities that are vibration-sensitive such as hospitals with vibration-sensitive equipment and universities conducting physical research operations; and institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, and doctors' offices. Further, the FTA states that commercial or industrial locations including office buildings are not included in this category, unless there is vibration-sensitive activity or equipment within the building.

Architectural Damage

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

Table XIII-5 above identifies a PPV level of 0.12 as the threshold at which there is a risk to buildings extremely susceptible to vibration damage (such as historical buildings) and a PPV level of 0.2 as the threshold at which there is a risk to non-engineered timber and masonry buildings. The building façade of the existing onsite hospital buildings are located approximately 8 feet from construction activity areas. At a distance of 8 feet, a large bulldozer would generate 0.492 in/sec PPV. At a distance of 8 feet, a vibratory roller would generate 1.16 in/sec PPV (see vibration calculations available in **Appendix H** for details). Therefore, vibration damage to the closest buildings could potentially occur during construction of the Project.

As shown in **Table XIII-5**, above, the FTA's the vibration criterion for potential structural damage to FTA Building Category IV - Buildings extremely susceptible to vibration damage is 0.12 in/sec PPV;[83] the vibration criterion for potential structural damage to FTA Building Category III – Non-engineered timber and masonry buildings is 0.2 in/sec PPV.[84] Some of the onsite buildings that would be closest to areas of construction activity, such as the library, Williams Hall and the bungalows adjacent to the proposed parking lot, are classified as buildings that contribute to a historic district; therefore, they are classified as FTA type IV buildings and are subject to the 0.12 in/sec PPV criterion. At a distance of 20 feet from building facades, the vibration level from a large bulldozer drill is 0.124 in/sec PPV. At a distance of 36 feet from building facades, the vibration level from a vibratory roller is 0.122 in/sec PPV. Therefore, to avoid the potential for any structural damage to the adjacent buildings during construction, a bulldozer must not be operated within 20

[83] *FTA, Transit Noise and Vibration Impact Assessment. 2018.*

[84] *FTA, Transit Noise and Vibration Impact Assessment. 2018.*

feet and a roller must not be operated within 36 feet of the facades of existing buildings. With the implementation of mitigation measure **MM NOI-1**, impacts from groundborne vibration to the closest historic buildings would be reduced to a less-than-significant level.

MM NOI-1 requires that heavy machinery (excavators, large bulldozers) is not to be used within 20 feet and a vibratory roller is not to be used within 36 feet of onsite historic hospital buildings. Construction activity that must occur within these distances to the BRH campus buildings' facades would need to be performed with smaller equipment types that do not exceed the vibration thresholds applied herein. As shown above, the estimated maximum vibration levels for the construction of the proposed Project with the use of required setback distance mitigation measures (**MM NOI-1**) would be less than significant. With incorporation of mitigation measure **MM NOI-1**, vibration impacts to on-site historic buildings will be less than significant. No vibration impacts are anticipated to off-site receptors.

Operational Vibration

The Project proposes the construction of an approximately 80,454 SF skilled nursing facility and two new surface parking lots. The Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are required.

Mitigation Measures

Construction

MM NOI-1: The construction contractor shall avoid using large bulldozer within 20 feet or vibratory rollers within 36 feet of the façades of the on-site historic buildings listed as contributors to the historic district on the BRH campus.

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. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

The Project Site is located approximately 10.1 miles southeast of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible

to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Hollywood-Burbank Airport).85 Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[86] Therefore, no impacts would occur, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less than Significant Impact.

Construction

Construction of the Project would involve the development of a new SNF located in the southern portion of the BRH campus containing 150 patient beds. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. As such, it would not be expected that construction workers would relocate their homes as a result of employment on the Project.

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85 *Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.*

86 *Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; accessed: April 2021.*

Operation

Employment

The Project includes the construction of a new 80,454 square foot SNF building in the southern portion of the existing BRH campus, containing 150 patient beds. According to the City's VMT Calculator, which was utilized in preparation of the Project's Transportation Assessment, the Project would generate an increase of approximately 60 employees on the Project Site.[87]

As shown in **Table XIV-1, Population, Housing, and Employment Forecasts for the City of Los Angeles,** SCAG estimates that there will be 4,164,832 residents, 1,484,520 total housing unit, and 1,927,636 jobs in the City in 2024 at project buildout. Moreover, SCAG's RTP/SCS estimates the population of the City will increase to 4,771,300 residents by 2045. Housing in the City is estimated by SCAG to increase to 1,793,000 housing units by 2045. Employment in the City is estimated by SCAG to increase to 2,135,900 jobs by 2045.

Table XIV-1
Population, Housing, and Employment Forecasts
for the City of Los Angeles

Area	Population	Households	Employment
City of Los Angeles			
SCAG Forecasts			
2016	3,933,800	1,367,000	1,848,300
2024	4,164,832	1,484,520	1,927,636
2045	4,771,300	1,793,000	2,135,900
Percent Change (%)			
2016 to 2024	+5.7	+8.2	+4.2
2016 to 2045	+19.2	+27.0	+14.4
Source: *Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast, Table 14, September 2021.*			

With respect to employment, the Project would result in an increase of 60 jobs to the area. Estimates extrapolated from SCAG data projects the Citywide job supply to increase by 79,336 jobs between 2016 and 2024, and by 208,264 jobs between 2024 and 2045. The addition of 60 proposed jobs would be within the growth anticipated based on SCAG projections, representing approximately 0.08 percent of the Citywide total jobs for the period of 2016 to 2024, and approximately 0.03 percent of the Citywide total growth for the period of 2024 to 2045. This increase is within the anticipated jobs based on SCAG projections for employment and would therefore not represent unplanned growth within the City of Los Angeles. As such, job growth associated with the Project would be less than significant and no mitigation measures are required.

Housing

The Project Site is currently developed with the BRH complex and does not include residential units; thus, the Project would not result in the displacement of housing. As previously discussed, the Project would result in an increase of 60 employees to work at the Project Site, which could

[87] *Overland Traffic Consultants, Inc., Traffic Assessment for Barlow Respiratory Hospital Skilled Nursing Facility, Located at 2000 Stadium Way in the Silver Lake-Echo Park-Elysian Valley Community Plan Area of the City of Los Angeles, January 2022, Appendix D: VMT Analysis Worksheets.*

include a range of full-time and part-time positions. It is not anticipated that this would result in induced housing growth on and in the vicinity of the Project Site as it is reasonable to expect that some of the new employees would be drawn from the local labor force within the City of Los Angeles and surrounding cities. It is also possible that some of the employment offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing. However, it is anticipated that some of this demand would be filled by existing vacancies in the housing market and others by any new developments that may occur in the vicinity of the Project Site. Moreover, the Project Site and City of Los Angeles is well-served by existing transit options, which would be readily available for employees to use to commute to and from their jobs at the Project Site. Thus, the Project's potential to induce housing growth from the increase in employees on the Project Site is not considered to be significant due to the readily available local labor force, existing transit opportunities to the Project Site, and the existing and forthcoming housing stock available within the City.

As discussed previously, the Project does not propose the development of residential units. The Project would result in an increase of 60 employees on the Project Site, which would not result in a notable increase in the demand for new housing, and any new housing development, should it occur, would be minor in context of forecasted growth in the City of Los Angeles. Therefore, the Project would be within SCAG's Citywide projections for housing unit growth. As such, impacts related to housing growth would be less than significant.

Population

As discussed previously, the Project does not propose the development of residential units. As such, the Project would not result in a notable increase in the population of the City of Los Angeles, and any new development, should it occur, would be minor in context of forecasted growth in the City of Los Angeles. Therefore, impacts related to population growth would be less than significant.

Infrastructure

The Project would include development of utilities infrastructure such as water lines, sewer laterals, electric power and natural gas lines, and telecommunication cables, and transportation infrastructure, including one new driveway, however, all utilities installations would occur on-site and would serve the SNF. Furthermore, the Project Site is currently served by utilities and roadways and is located in a developed, urban area of the City. The SNF use proposed by the Project would be consistent with the existing BRH campus uses currently on the Project Site. The Project would not require and does not propose increases or expansions of off-site utilities or extension of public roadways into undeveloped areas. Minor local upgrades and connections to off-site utilities may be required, however, all such upgrades and connections would serve to increase capacity for the Project and existing local land uses, and would not significantly increase the potential for expansive development in the local vicinity or regional area.

Summary

Based on the above, the Project would not induce substantial unplanned population growth during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The Project Site is currently developed with the BRH campus. The Project would not involve the demolition, removal, or change in use of any existing residential uses. The Project would involve the development of a new SNF located in the southern portion of the BRH campus containing 150 patient beds. As such, the Project would not displace substantial numbers of existing people or housing and the construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

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

a. Fire Protection?

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department ("LAFD") considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station with an engine company is 1.5 miles, and the maximum response distance from fire stations with a truck company is 2.0 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

Construction

The Project is skilled nursing facility development and does not involve the construction or physical alteration of a fire station

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, Occupational Safety & Health Administration ("OSHA") has developed safety and health provisions for implementation during construction, which are set forth in Title 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[88] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[89] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and Federal regulations governing such activities. The Project would be required to implement standard BMPs set forth by the City and the RWQCB, which would ensure that waste generated during the construction process are disposed of properly. Compliance with these regulatory requirements would

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88 *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, website: https://www.osha.gov/laws-regs/regulations/standardnumber/1926, accessed November 2021.*

89 *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, website: https://www.osha.gov/laws-regs/regulations/standardnumber/1926, accessed November 2021.*

effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. In addition, the Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of grading and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts or impairment of an emergency response or evacuation.

Moreover, construction impacts are temporary in nature and do not cause lasting effects that would impact LAFD fire protection services. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain response distances, emergency access, or other performance objectives of the LAFD.

Given the short-term nature of construction, the controlled nature of the construction activities, and the fire stations that are readily available to serve the Project Site, Project construction would not require the provision of or need for new or altered fire protection facilities, in order to maintain acceptable fire services. Therefore, potential impacts to fire protection services during the construction of the Project would be less than significant.

Operation

Response Distance and Time

The Project Site and the surrounding area are currently served by Fire Station No. 20 located at 2144 Sunset Boulevard (approximately 1.2-miles west of the Site).[90] Fire Station No. 20 includes an Assessment Light Force, which is a combined response utilizing a pump engine and a ladder truck, one basic life services rescue ambulance, and one paramedic rescue ambulance.[91] Thus, under LAFD criteria, the existing fire response distance from Fire Station No. 20 to the Project Site is adequate for an engine company and a truck company. Regardless, the Project would install automatic fire sprinkler systems in the proposed SNF use.

The Court of Appeal in *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th 833 clarified that significant impacts related to fire protection services must include an adverse change in any of the physical conditions within the area of a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project applicant to mitigate. Delay in emergency response times and the need for additional fire protection services without an adverse physical environmental change are not environmental impacts that CEQA require a project applicant to mitigate. A City is obligated to provide adequate

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90 *City of Los Angeles Fire Department, Find Your Station, website: https://www.lafd.org/fire-stations/station-results, accessed November 2021.*

91 *Los Angeles Fire Department, Fire Station Directory, March 2014, page 2.*

fire and emergency medical services under the California Constitution. Therefore, the following discussion of response times is provided for informational purposes only.

Response time relates directly to the physical linear travel distance (i.e., the number of roadway-miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time. The LAFD created FireStatLA in 2014 to track and evaluate response time data in order to improve response times citywide. Response metrics for January through October 2021 show that Fire Station No. 20 had an average response time for non-EMS calls of 4 minutes and 5 seconds, and 4 minutes and 28 seconds for EMS calls.[92]

LAFD has not formally established response times standards for emergency response, nor adopted the National Fire Protection Association ("NFPA") standards of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response (as established for fire department turnout time and travel time, which does not include call intake, processing, or transfer, or dispatch).[93] According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System ("FPS"), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[94] The City has over 205 miles of major arterial routes that are equipped with FPS.[95]

Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., Stadium Way, Scott Avenue, and Boylston Street). All improvements proposed would comply with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation.

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92 *City of Los Angeles Fire Department, Fire Stat LA, website: https://www.lafd.org/fsla/stations-map?station=20&year=2021, accessed November 2021.*

93 *NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition, website: https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1710, accessed November 2021.*

94 *Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, website: https://ladot.lacity.org/sites/default/files/documents/ladot-atsac-signals-_-fact-sheet-2-14-2016.pdf, accessed November 2021.*

95 *Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008, website: http://docplayer.net/84289234-Douglas-l-barry-fire-chief-bulletin-no-133-date-of-issue-10-2008-traffic-signal-preemption-system-for-emergency-vehicles.html, accessed November 2021.*

Fire Flow

The LADWP currently provides water for fire flow to the Project area. Fire flows are supplied by the same water mains as the domestic water systems including the lines 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 development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction).

Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements for industrial and commercial land uses is 6,000 gallons per minute ("gpm") to 9,000 gpm from four to six fire hydrants flowing simultaneously. A minimum residual water pressure of 20 pounds per square inch ("PSI") is to remain in the water system while the required gpm is flowing. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 300 feet of all first-story portions of industrial and commercial buildings, such as the SNF building. Two fire hydrants are located in the immediate vicinity of the Project Site; southwest corner of Boylston Street and Scott Avenue and northeast corner of Stadium Way and Boylston.[96] The entire Project Site is within 300 feet of existing hydrants. Additional fire hydrants may be required, depending on the building design and LAFD requirements, as determined by LAFD; however, no new hydrants are anticipated. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process and in accordance with all applicable City and LAFD requirements. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration. Accordingly, any limited infrastructure-related construction activity would not result in any significant environmental impacts.

Summary

Based on the above, the Project would be located within the maximum response distance for an LAFD engine company and an LAFD truck company and no new or expanded fire protection services would be required. In addition, Project Site design, including emergency access and number and locations of fire hydrants based on the Project's land use would be determined by LAFD as part of the City's building permit process. Any required revisions to the Project's design to ensure adequate fire flow requirements would be required to be implemented by the Project prior to the issuance of building permits. Because the Project would meet the LAFD's standards for adequate fire protection, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or

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96 *City of Los Angeles Geo Hub, fire hydrant locations, website: https://geohub.lacity.org/datasets/39e5c79ddd8a4eada40340f6ceb08fae/explore?location=34.075005%2C-118.246104%2C18.00, accessed November 2021.*

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 fire protection. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b. Police protection?

Less than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective.

The Project would be served by the LAPD Northeast Community Police Station located at 3353 San Fernando Road, approximately 3.8-miles to the north of the Project Site. The Northeast Community Police Station, which is under the jurisdiction of the Central Bureau, serves a community area encompassing 29 square miles, including the Project Site, and contains a population of approximately 250,000. For the purposes of the LAPD, the Northeast Community Area boundaries are roughly defined as: Harbor Freeway (I-110) on the east, North Hollywood and Western Avenue on the west, Ventura Freeway (SR 134), excluding Griffith Park, on the north and Sunset Boulevard on the south.[97] The Project Site is located in Reporting District 1185.[98]

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

Construction

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

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97 *Los Angeles Police Department Northeast Community Police Station, website: https://www.lapdonline.org/lapd-contact/central-bureau/northeast-community-police-station/?zip=2000%20stadium%20way%20los%20angeles%20, accessed November 2021.*

98 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: November 2021.*

cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

Operation

Operation of the Project would result in an on-site population of approximately 60 employees and visitors of patients, thereby generating a potential increase in the number of service calls from the Project Site.[99] Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, as required by the City as a regulatory compliance measure, the Project would implement principles of the City's *Crime Prevention through Environmental Design Guidelines* subject to the approval of LAPD prior to the issuance of building permits.[100] Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Additionally, the continuous visible and non-visible presence of employees would provide a sense of security during evening and morning hours. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts.

Although there are no known police station construction or facilities expansion projects planned for the Project area, in the event that the City determines that expanded or new police facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Furthermore, as with fire services, if the demand for police services in a given area increases, it is the LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including police protection services. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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99 *Refer to **Section XIV. Population and Housing**, of this Initial Study.*

100 *City of Los Angeles Police Department, Crime Prevention Section, Design Out Crime Guidelines: Crime Prevention through Environmental Design, November 1997, website: https://www.lapdonline.org/design-out-crime/, accessed: November 2021.*

c. Schools?

No Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The Project would have less than significant impacts on schools because it would be subject California Government Code Section 65995, which allows Los Angeles Unified School District ("LAUSD") to collect impact fees from developers of new commercial developments.

The Project proposes to expand the existing BRH campus through the construction of a new SNF in the southern portion of the existing campus. The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, no impacts related to an increased demand for school facilities would be occur under the Project and no mitigation measures would be required.

Mitigation Measures

None required.

d. Parks?

No Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project proposes to expand the existing BRH campus through the construction of a new SNF in the southern portion of the existing campus. The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for park services would be negligible. Therefore, no impacts related to an increased demand for park facilities would occur under the Project and no mitigation measures would be required.

Mitigation Measures

None required.

e. Other public facilities?

No Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The Project Site would be served by the Edendale Branch Library. The Edendale Branch Library, which is located at 2011 W. Sunset Boulevard, located 1.1 mile west of the Project Site.

The Project proposes to expand the existing BRH campus through the construction of a new SNF in the southern portion of the existing campus. The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for

public facilities would be negligible. The Los Angeles Public Library System ("LAPL") provides library services at the Central Library, 7 reginal branch libraries, 56 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles. The Project is not expected to create a demand for library services as no new residential population would be generated. As such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. Therefore, no impacts related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures would be required.

Mitigation Measures

None required.

XVI. RECREATION

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. As detailed in response to **Checklist Question XV(d)**, the Project's population increase of 60 employees would not alter the City's parkland ratio, which would remain 3.8 acres per 1,000 residents. Furthermore, the Project's incremental increase of 60 employees would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur nor would it require the construction or expansion of such facilities which might have an adverse physical effect on the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

As part of the Project, the Applicant has agreed to implement project design feature PDF TR-1 as follows:

PDF TR-1 Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction related Project representatives (i.e., construction contractors) whose projects would potentially be under construction at around the same time as the Project would be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination would ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The Construction Management Plan would include, but not be limited to, the following elements as appropriate:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets would be prohibited.
- Worker parking would be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way would be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., would be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles would be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists would be obtained through such measures as alternate routing and protection barriers as appropriate.
- Covered walkways would be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant would keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk would be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians would be routed around any such lane or sidewalk closures.
- The locations of the off-site truck staging would be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route and do not travel through residential neighborhoods.

PDF TR-2 The Project includes one TDM measure that reduces trips and VMT through TDM strategies and is included in the VMT analysis for the Project. This TDM project feature, as described by LADOT'S TAG, is listed below:

<u>BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC</u> – This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 24 bicycle parking spaces.

The following analysis of the potential transportation impacts of the Project is based, in part, on the information and conclusions contained within the Transportation Assessment[101] prepared for the Project by Overland Traffic Consultants, Inc. in January 2022. The Transportation Assessment is included as **Appendix I** to this IS/MND and its findings, conclusions, and recommendations are incorporated by reference herein. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (July 2020). The scope of, and analysis included in, the Transportation Assessment was developed in consultation with LADOT as set forth in a Memorandum of Understanding included as Appendix A of the Transportation Assessment.

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

Less than Significant Impact. In July 2019, LADOT updated the City's Transportation Assessment Guidelines ("TAG") to conform to the requirements of Senate Bill 743. TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act from level of service ("LOS") to vehicle miles traveled ("VMT"). Table 2.1-1 in the TAG lists Citywide plans, policies, and programs that could apply to a project, including, but not limited to, Mobility Plan 2035, Community Plans, Specific Plans, and the LAMC. The Project's consistency with applicable policies of the Silver Lake—Echo Park—Elysian Valley Community Plan and the LAMC is provided in response to **Checklist Section XI, Land Use**. As detailed there, with the approval of a CUP, the Project would be consistent with the applicable land use plans. The Project's potential to conflict with the Mobility Plan 2035 is discussed below.

To guide the City's Mobility Plan 2035, the City adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects shall be evaluated for conformance with these City adopted transportation plans, programs, and policies. In accordance with the City's TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. **Table XVII, Consistency Check with Key City Plans, Programs, Ordinances, and Policies** presents the Project's consistency with applicable plans, programs, ordinances, and policies as determined by the Transportation Assessment.

Table XVII
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Consistency Evaluation
LA Mobility Plan 2035	Yes	Stadium Way is designated as an Avenue I roadway requiring 100-foot right-of way and 70-foot roadway. Stadium Way is dedicated with 70 feet of right-of-way. Pursuant to LAMC 17.50, the Project proposes a waiver of dedication through the Parcel Map process. Scott Avenue & Boylston Street are designated as local streets requiring a 60-foot right-of-way and 36-foot roadway. Scott Avenue is currently 80 feet of right-of-way and Boylston Street is dedicated with 82.5 feet of right-of-

[101] *Overland Traffic Consultants, Inc., Traffic Assessment for Barlow Respiratory Hospital Skilled Nursing Facility, Located at 2000 Stadium Way in the Silver Lake-Echo Park-Elysian Valley Community Plan Area of the City of Los Angeles, January 2022.*

Table XVII
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Consistency Evaluation
		way. No dedication required on Scott Avenue and Boylston Street.
Plan for a Healthy LA	Yes	The Project would support Policy 5.7, Land Use Planning for Public Health and Greenhouse Gas Emission Reduction, by reducing single-occupant vehicle trips by its proximity to transit service and on-site cycling amenities. The Project would not conflict with other policies in the Plan for Healthy LA.
Land Use Element of the General Plan (35 Community Plans	Yes	The Project is in the Silver Lake-Echo Park-Elysian Valley Plan area. The Project would be in substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.
Specific Plans	Not Applicable	The Project Site is not within a Specific Plan area.
LAMC Section 12.21A.16 (Bicycle Parking)	Yes	The Project would, at a minimum, comply with the required of short- and long-term bicycle parking pursuant to LAMC Section 12.21A.16.
LAMC Section 12.26J (TDM Ordinance)	Yes	LAMC Section 12.26J for Transportation Demand Management and Trip Reduction Measures applies to the construction of new non-residential floor area greater than 25,000 square feet. The Project would comply with this requirement.
LAMC Section 17.50 Parcel Maps	Yes	The Project requests a waiver of dedication and improvements through the Parcel Map Process for: the 15-foot dedications along Stadium Way; the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Stadium Way; the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Scott Avenue and Stadium Way; the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Stadium Way and Boylston Street; and relief from the curb and sidewalk standards on Boylston Street. The Applicant requests these waivers because portions of a lot along Stadium Way are occupied by legally existing hospital buildings which are to remain and because a complete roadway curb, gutter and sidewalk improvements exist within the present dedication and are contiguous. Additional dedication or improvement is not necessary to meet the City's mobility needs for the next 20 years based on guidelines the Streets Standards Committee has established.
Vision Zero Action Plan	Yes	The Project would improve driver visibility at the site by converting the existing south most driveway on Stadium Way from a single two-way driveway to two one-way driveways with a raised median between them. The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.
Vision Zero Corridor Plan	Yes	The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.
Citywide Design Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all	Yes	The Project would create a continuous and straight sidewalk clear of obstructions for pedestrian travel. The Project would provide adequate sidewalk width and right-of-way that accommodates pedestrian flow and activity. Pedestrian access would be provided at street level with direct access to the surrounding neighborhood and amenities.
Citywide Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience	Yes	The Project complies with the Citywide Design Guidelines incorporating vehicle access locations that do not discourage and/or inhibit the pedestrian experience. Vehicular access is located along a local street and Avenue I roadway. The Project vehicular access complies with driveway location standards.

Table XVII
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Consistency Evaluation
Citywide Guideline 3: Design projects to actively engage with streets and public space and maintain human scale	Yes	The building design uses attractive architectural elements. The Project would not preclude or conflict with the implementation of future streetscape projects in the public right-of-way.

As summarized in **Table XVII**, the Project would not conflict with most key City planning documents. Pursuant to LAMC Section 17.50, the Project would request a waiver of dedication and improvements for:

i. the 15-foot dedications along Stadium Way;
ii. the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Stadium Way;
iii. the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Scott Avenue and Stadium Way;
iv. the 15-foot by 15-foot corner cut dedication of 20-foot radius curve on the corner of Stadium Way and Boylston Street; and
v. relief from the curb and sidewalk standards on Boylston Street.

LAMC Section 17.53 provides the Advisory Agency determines the dedications and improvements in the approval of a parcel map. Waiver of the dedication and improvement requirements is requested because portions of a lot along Stadium Way are occupied by a legally existing hospital buildings which are to remain and because a complete roadway curb, gutter and sidewalk improvements exist within the present dedication contiguous thereto. Additional dedication or improvement is not necessary to meet the City's mobility needs for the next 20 years based on guidelines the Streets Standards Committee has established.

Stadium Way is an Avenue I roadway requiring a 100-foot right-of way and 70-foot roadway. Currently, Stadium Way is dedicated with 70 feet of right-of-way. A 15-foot dedication would be required. However, a 15-foot dedication along Stadium Way would intersect existing buildings on the Site and the roadway cannot be widened due to the location of some existing buildings that would remain. Therefore, the required dedication and widening would not be feasible on this section of Stadium Way. North Boylston Street is over dedicated and improved along the southern boundary of the Site at its intersection with Stadium Way to approximately 200 feet northeasterly. North Boylston Street improvements diverge away from the property at this point. The portion of North Boylston Street beyond the approximately 200 feet northeasterly along the Project frontage is unimproved.

According to the Transportation Assessment, the waivers would not result in potential impacts because portions of a lot along Stadium Way are occupied by legally existing hospital buildings which are to remain and because a complete roadway curb, gutter and sidewalk improvements exist within the present dedication and are contiguous. Additional dedication or improvement would not be necessary to meet the City's mobility needs for the next 20 years based on guidelines the Streets Standards Committee has established.

As such, based on the above as well as the analysis presented in **Checklist Section XI, Land Use**, the Project would not conflict with a program, plan, ordinance, or policy addressing the

circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. CEQA Guidelines Section 15064.3 describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. As discussed above, the Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the LADOT TAG. The TAG states that a development project would result in a potential impact if it would generate VMT exceeding 15 percent below the existing average VMT per employee for the Area Planning Commission (APC) area in which the project is located. Specifically, as identified in the Transportation Assessment, the Project Site is located in the East Los Angeles APC area which limits daily household VMT per capita to a threshold value of above 7.2 and a daily work VMT per employee to a threshold value of above 12.7. The VMT is determined, in part, from the Institute of Transportation Engineers Trip Generation Manual (ITE Manual). In the ITE Manual, the employees and residents of the SNF are represented in the trip generation. The proposed SNF is considered a household land use in the VMT calculator. The employees of the SNF are represented in the household calculation and considered negligible in the Work VMT per employee evaluation. As such, the daily work VMT limits per employee is not applicable to the Project.

Results of the Project's VMT calculation provide an estimate based on a project's land uses, size, and any TDM program strategies that are included as project design features. Under Project Design Feature TR-2, the Project proposes provide a sufficient number of bicycle parking to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21.A.16 with 8 short term bicycle parking spaces and 16 long term bicycles spaces.

With implementation of Project Design Feature TR-2, the household VMT per capita for the Project would be 7.5, which exceeds the daily household VMT per capita for the East Los Angeles APC area of 7.2. Accordingly, mitigation measure MM TR-1 would be required. Mitigation measure MM TR-1 requires additional TDM strategy of education and encouragement of site-specific alternative transportation options. Following implementation of MM TR-1, the Project's household VMT per capita would be reduced to 7.2, which would be within the daily household VMT per capita for the East Los Angeles APC area and the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts would be less than significant with mitigation.

Mitigation Measures

MM TR-1 TDM Program Project Mitigation: The Project proposes an additional TDM measure as mitigation to reduce trips and VMT and is included in the VMT analysis for the Project. This TDM mitigation, as described by LADOT's TAG, is listed below:

EDUCATION & ENCOURAGEMENT – Promotions and Marketing – This TDM strategy involves uses of market and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive education and promotional tools such as posters, information boards and/or website with information that a traveler could choose to read at their leisure.

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.

Construction

During construction, the Project would require the use of heavy equipment and would generate traffic on the local roadway system in the form of deliveries of materials and supplies and haul trucks. However, construction would be temporary and all construction staging would occur on-site. Furthermore, the Project is required to obtain a haul route approval from the Board of Building and Safety Commissioners for the import or export of 1,000 cubic yards of soil in a hillside area or Special Grading Area. However, as part of the Project, **PDF TR-1** calls for the preparation of a Construction Management Plan for review and approval by LADOT prior to the issuance of building permits. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community, including through the scheduling and coordination of haul trips along the approved haul route. As such, construction of the Project would not substantially increase hazards due to incompatible uses. Therefore, impacts during construction would be less than significant with mitigation incorporated.

Operation

The Project proposes adding additional facilities to the existing BRH campus that conforms with the surrounding development and utilizes the existing roadway network. The roadways adjacent to the Project Site are part of the existing roadway network and contain no sharp curves or dangerous intersections due to design features. Vehicular access to the proposed SNF building and new parking lot proposed for the central portion of the Project Site, east of the bungalows, would be via a driveway just north of the proposed SNF building. The driveway would have divided lanes for ingress and egress separated by a landscaped median. The ingress lane would have a dedicated, on-site turning lane along Stadium Way. The driveway would provide vehicular access to the proposed internal roadway with access to the on-grade parking within Floor 1 of the SNF building and the proposed new parking lot to the northeast. Vehicular access to the second proposed new parking lot to be located north of the Library building would be via an existing driveway mid-block along Stadium Way. The Project would not alter any other vehicular access points. The Project's roads and driveways would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. The Project's driveways would also conform to the City's applicable emergency access requirements as set forth by the LADOT and the LAFD. Furthermore, the Project design would be reviewed by the Department of City Planning, LADBS, and the LAFD during the City's plan review process to ensure all applicable requirements are met.

Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site and all Project-generated traffic would be of a typical type and amount for a single-family subdivision. Therefore, impacts would be less than significant during operation and no mitigation measures would be required.

Mitigation Measures

None required.

d) Result in inadequate emergency access?

Less than Significant Impact. As detailed in response to **Checklist Question IX(f)**, it is expected that Project construction activities and staging areas would remain entirely on-site and would not require temporary street and/or lane closure(s) on Stadium Way, Boylston Street, or Scott Avenue. In the event that lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with the Construction Management Plan (see PDF TR-1 in **Checklist Section XVII, Transportation**) that would be implemented to ensure adequate emergency access and circulation.

With regards to operation, the Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would continue to be provided from Stadium Way. The Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As discussed in **Checklist Section XV, Public Services**, the Project's proposed design, including ingress/egress and internal circulation, would be subject to review and approval by the Los Angeles fire and police departments. The Project would also introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed under **Checklist Section XVII, Transportation**, the Project would result in less-than-significant traffic impacts. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806.

Based on the above, emergency access to the Project Site and surrounding uses would be maintained at all times. As such, the Project would not result in inadequate emergency access. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

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

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

Less than Significant Impact with Mitigation Incorporated. Assembly Bill 52 ("AB 52"), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources ("TCR") and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that

the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project.

A records search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the Project. A letter from the NAHC dated December 20, 2021 stated that the search was positive for the Sacred Lands File, and the Gabrieleno Band of Mission Indians-Kizh Nation was found to be associated with the Project area as shown in Appendix D. Additionally, a records search was prepared by the South Central Coastal Information Center ("SCCIC") at California State University, Fullerton and the Natural History Museum of Los Angeles County as shown in Appendix D.

As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. On May 13, 2022, the Department of City Planning (DCP) sent a notification letter by certified US Mail to ten Native American tribes on the NAHC list of tribes. The letter described the project description, the depth of anticipated excavation, the anticipated amount of grading and export of dirt, the preparation of environmental review, and a request for a written response to begin the consultation of the Project. On May 19, 2022, DCP received a letter from the Gabrieleno Band of Mission Indians-Kizh Nation requesting for a consultation and scheduled a consultation for July 19, 2022. On July 14, 2022, Brandy Salas from the Gabrieleno Band of Mission Indians-Kizh Nation emailed to cancel the schedule consultation on July 19, 2022 due to schedule conflicts. Another consultation was scheduled for August 17, 2022 and was cancelled on the same day. The Gabrieleno Band of Mission Indians-Kizh Nation informed DCP that they would send the proposed mitigation measures through email, but no response has been received before the publishment of the IS/MND.

According to the Citywide General Plan Framework Final EIR, the Project Site and surrounding area are not within proximity of an area of known archaeological sites or archaeological survey areas.[102] However, the Project would involve the excavation and export of approximately 2,800 cubic yards of soil. In addition, the SCCIC and California Historical Resources Information Systems returned positive results. Thus, the potential exists for the unanticipated discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, and because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measure **MM TCR-1** would be required.

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

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[102] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, website: https://planning.lacity.org/odocument/ca5ec6a0-957a-4630-a247-d56ec738622f/GPF_FEIR_DEIR2.15.pdf, accessed November 2021.*

Mitigation Measures

MM TCR-1. Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors/consultants from the Gabrieleno Band of Mission Indians-Kizh Nation that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s)/consultant shall be approved by the Gabrieleno Band of Mission Indians-Kizh Nation Tribal Government. A qualified archaeologist/ archaeological monitor shall be identified as principal personnel who must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The archaeologist shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the City has determined that the Project site has a low potential for impacting tribal cultural resources after consultation with the tribal monitor/consultant and archaeologist.

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

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

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the immediate vicinity of the find until the find can be assessed by the archaeologist and tribal monitor/consultant.

2. If the archaeologist and the tribal monitor/consultant determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if the archaeologist, in consultation with the tribal monitor/consultant, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state, or local law, rule or regulation. Any discrepancies between the implementation of the recommendations shall be resolved through the City as the Lead Agency, in consultation with the archaeologist and tribal monitor/consultant.

5. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

6. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center ("SCCIC") at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

8. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public

Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

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

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) 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 with Mitigation Incorporated. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on May 13, 2022, and this 30-day notification period ended June 12, 2022. DCP received a letter from the Gabrieleno Band of Mission Indians-Kizh Nation requesting for a consultation within the 30-day notification period. However, two consultation meetings scheduled for July 19, 2022 and August 17, 2022 were canceled by the tribe representative from the Gabrieleno Band of Mission Indians-Kizh Nation. Instead of scheduling another consultation meeting, the tribe representative said they would send us the substantial evidence and the recommended mitigation measures through email, but no response has been received before the publishment of the IS/MND.

According to the Citywide General Plan Framework Final EIR, the Project Site and surrounding area are not within proximity of a known archaeological site.[103] However, although the Project Site is located in a highly urbanized area and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and export of approximately 2,800 cubic yards of soil. In addition, the SCCIC and California Historical Resources Information Systems returned positive results. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, and because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measure **MM TCR-1** is required.

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

Mitigation Measures

Refer to **MM TCR-1**, above.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

[103] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, website: https://planning.lacity.org/odocument/ca5ec6a0-957a-4630-a247-d56ec738622f/GPF_FEIR_DEIR2.15.pdf, accessed November 2021.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

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

Water Facilities

As detailed below in response to **Question XIX(b)**, sufficient water supplies would be available to serve the Project and no new offsite lines would be required. Additionally, as discussed in response to **Question XV(a)**, no new hydrants are anticipated. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis. The Project would require construction of new, on-site water distribution lines to serve the new SNF building. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and including offsite connection to existing water lines. Therefore, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts related to the construction of new water facilities would be less than significant and no mitigation measures would be required.

Wastewater Facilities

As detailed below in response to **Question XIX(c)**, the Project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities. During construction of the Project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. The Project would require construction of new on-site wastewater infrastructure to serve the new development, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor offsite work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work along the Project frontage would be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures.[104] The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts related to the construction of new wastewater facilities would be less than significant and no mitigation measures would be required.

Stormwater Drainage Facilities

Refer to **Question c(iii) in Section X, Hydrology and Water Quality**, above for a discussion of stormwater drainage facilities. As discussed there, BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the same location (discharges directly to Stadium Way and Scott Avenue) and drain to the same stormwater systems. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Accordingly, impacts related to the construction of new stormwater facilities would be less than significant and no mitigation measures would be required.

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[104] *City of Los Angeles, LA Sanitation and Environment, Wastewater Engineering Services Division, Barlow Respiratory Hospital Project – Request for Wastewater Service information, November 30, 2021 (See **Appendix J** to this IS/MND).*

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in PDF TR-1 under **Checklist Section XVII, Transportation**, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to the existing electrical facilities. Electricity demand during construction would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities.

As detailed in response to **Question VI(a)**, the estimated electricity demand of the Project during operation would represent an insignificant percentage of the LADWP's projected annual sales.[105] Furthermore, as discussed in response to **Question VI(a)**, the incorporation of the 2016 Title 24 energy conservation standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including electricity. As such, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Based on the above, the construction of new on-site electric power distribution facilities would not result in significant environmental effects and the expansion of off-site electric power sources would not be required. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. Construction activities typically do not involve the consumption of natural gas. Accordingly, construction of the Project would not require the installation of natural gas facilities. As detailed in **Checklist Section VI, Energy**, the Project's operational natural gas demand would represent an insignificant percentage of SoCalGas' available supplies and would not require new or expanded sources of natural gas. However, the Project would require construction of new, on-site gas distribution lines to serve the new SNF building.

The Project would connect to existing natural gas facilities in coordination with and under the supervision of SoCalGas. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in PDF TR-1 under **Checklist Section XVII, Transportation**, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to the existing natural gas facilities. Therefore, the construction of new natural gas facilities would not

[105] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

result in significant environmental effects. Accordingly, impacts to natural gas facilities would be less than significant and no mitigation measures would be required.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in PDF TR-1 under **Checklist Section XVII, Transportation**, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to off-site telecommunication facilities. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets, low-flow showerheads and faucets, high-efficiency clothes washers, and high-efficiency dish washers. All fixtures would be required to meet applicable flush volumes and flow rates. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. Accounting for compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, the CalEEMod outputs prepared for the Project (see **Appendix A** of this IS/MND) estimated that the Project would have an annual water demand of 7.97 million gallons per year (24.46 acre-feet per year [AFY]).

LADWP's *2020 Urban Water Management Plan* (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been

reduced by 29 percent; with the average water usage below the average usage in the 1970s.[106] The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in **Table XIX-1, LADWP Water Supply and Demand Projections**.

Table XIX-1
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
Average Years						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

AFY = acre-feet per year
1 Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.

As shown in **Table XIX-1**, annual water demand within the City is projected to increase over the planning period by between 67,200 AFY and 72,000 AFY. The Project's estimated 24.46 AFY demand would represent 0.04 percent of the projected increase in annual water demand of 67,200 AFY from 2025 to 2045. Moreover, as also shown in **Table XIX-1**, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions.

[106] *City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3, website: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf, accessed November 2021.*

As detailed in **Checklist Section XIV, Population and Housing**, the Project's population growth would be consistent with the forecasted population growth for the City by 2045. Accordingly, the Project's estimated water demand has been accounted for within LADWP's projections and would not exceed the water demand estimates of the 2020 UWMP. As such, the Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple-dry years. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The City's Bureau of Sanitation provides wastewater service to the Project area. Wastewater from the Project Site would be conveyed from the Project Site via the City's existing wastewater infrastructure to the HWRP. The HWRP treats an average daily flow of 275 million gallons per day (mgd) in dry weather. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days, with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.[107] This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HTP. According to the CalEEMod outputs prepared for the Project (see **Appendix A**), the Project's indoor water demand would be approximately 4.89 million gallons per year, or approximately 13,397 gallons per day. Assuming that 100 percent of the Project's indoor water demand would subsequently be treated as wastewater, the Project's wastewater generation would account for 0.008 percent of the remaining daily capacity at the HWRP. As such, the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to existing commitments. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. The Los Angeles Bureau of Sanitation and Environment (LASAN) manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN provides collection services primarily to single-family residences, while multi-family residences, such as apartments (e.g., the proposed Project), contract with a private company to collect and transport their materials for disposal or recycling. Solid waste transported

[107] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, available at: 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, accessed November 2021.*

by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste[108] such as construction and demolition (C&D) waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. The County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent 2019 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 148.4 million tons as of December 2019. Most commonly, solid waste collected within the City is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day and, based on its average daily intake of 6,919 tons per day, has capacity for an additional 5,181 tons per day.[109] The 2019 CoIWMP estimates that it has a remaining capacity of 59.16 million tons and a remaining life of 18 years.[110] The Azusa Land Reclamation facility is the only permitted inert waste landfill in the County that has a full solid waste facility permit; the landfill had 58.84 million tons of remaining capacity and an average daily disposal rate of 854 tons per day as of December 2019.[111]

Under state law (AB 939, as amended by AB 341), jurisdictions are currently required to meet a solid waste diversion goal of 75 percent. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching "zero waste." The goal of zero waste, as defined by the RENEW LA Plan, is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a zero waste city by 2030.[112] To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration

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[108] *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

[109] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed November 2021.*

[110] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed November 2021.*

[111] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed November 2021.*

[112] *City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015, available at: https://www.lacitysan.org/san/sandocview?docname=cnt012522, accessed November 2021.*

programs, and C&D waste recycling (also required by SB 1374). Using calculation methodology adopted by the state, the City achieved a 76.4 percent diversion rate by 2012.[113]

Construction

Construction debris would consist primarily of debris from the demolition of a vacant, 926-square-foot building and 430-square-foot slab from a previously-demolished building in the central portion of the Project Site, and two existing parking lots, totaling 39,529 square feet, in the southern portion of the Site that would be disposed of as inert waste. Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 156.5 tons of solid waste,[114] and approximately 1,052.6 tons of demolition debris, for a total construction waste of 1,209.1 tons.[115]

Pursuant to the requirements of the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181519), all haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste, which can only be taken to City-certified C&D processing facilities. In accordance with the requirements of AB 939 and SB 1374, which mandate diversion of construction and demolition waste through salvaging, recycling, and reuse, it is assumed that 75 percent of the Project's construction waste would be diverted from disposal. Accordingly, the Project would result in 1,209.1 tons of construction waste that would require disposal at an inert waste landfill. Based on Azusa Land Reclamation's 58.84 million tons of remaining capacity, there would be sufficient capacity to serve the construction waste disposal needs of the Project. In addition, the Project would require a total of 2,800 cy of soil export for disposal. Based on Sunshine Canyon's 59.16 million tons of remaining capacity, there would be sufficient capacity to serve the soil export disposal needs of the Project. Based on the available capacity and the required diversion requirements, construction of the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant and no mitigation measures would be required.

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[113] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 3, website: https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf, accessed November 2021.*

[114] *A construction waste generation rate of 3.89 pounds per square foot for nonresidential construction was used. 80,454 square feet of nonresidential construction multiplied by 3.89 pounds is 312,966 pounds (156.5 tons). Source: USEPA Report No. EPA A530-98-010, Characterization of building Related Construction and Debris in the United States, July 1998, website: https://www.epa.gov/sites/default/files/2016-03/documents/charact_bulding_related_cd.pdf, accessed November 2021.*

[115] *A building demolition waste generation rate of 0.046 tons per square foot was used. 926 square feet of demolition multiplied by 0.046 tons is 42.6 tons. Source: CalEEMod User Guide Appendix A, page 13: 1 sf of building space represents 0.046 ton of waste material. A surface parking demolition waste generation rate of 39,529 square feet of surface area @ 1 foot deep slab = 39,529 cubic feet of demolition volume, or 1,464 cubic yards was used. The asphalt conversion factor is 1 cubic yard of asphalt/paving = 1,380 pounds of waste. Therefore, the 39,529 square-foot parking areas would generate approximately 2,020,320 pounds, or 1,010 tons of demolition debris. Total demolition debris is 1,052.6 tons (42.6 tons of building demolition debris + 1,010 tons of parking lot demolition debris = 1,052.6 tons of demolition debris). Source: California Department of Resources Recycling and Recovery.*

Operation

As previously detailed, the City is required by AB 939/AB 341 to divert 75 percent of solid waste generated within the City from landfill disposal. The City's RENEW LA Plan has also set a goal of 90 percent diversion by 2025 and zero waste by 2030. In order to meet diversion requirements and achieve increased diversion goals, the City implements programs that would be implemented at the Project Site such as separate curbside recycling and yard waste/composting bins. Accounting for mandatory recycling and composting that would be provided to Project employees through the City's waste hauling service, CalEEMod outputs prepared for the Project (see **Appendix A**), estimate that the anticipated total solid waste generation for the SNF development would be to 34.5 tons of solid waste per year (0.11 tons per day)[116] that would require disposal at a Class III landfill. Based on Sunshine Canyon Landfill's permitted daily capacity of 12,100 tons per day, remaining daily capacity of 5,181 tons per day, remaining permitted capacity of 59.16 million tons, and remaining lifetime of 18 years, there would be sufficient capacity to serve the disposal needs of the Project. Based on the available capacity and the required diversion requirements, operation of the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project would be consistent with applicable regulation associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include on-site trash and recycling areas for each home. The Project would generate solid waste that is typical of a hospital project and would be required to be consistent with all federal, state, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as discussed above). Therefore, Project impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

[116] *According to the 2020 ColWMP, average daily intake quantities are based on 312 days per year (6 days a week). Calculated as follows: 34.5 tons per year / 312 days per year = 0.11 tons per day.*

XX. WILDFIRE

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

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

Less than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone.[117] The Project Site is located along Stadium Way, which is not designated as a Primary or Secondary Disaster Route.[118] It is expected that Project construction activities and staging areas would remain entirely on-site and would not require temporary street and/or lane closure(s) on Stadium Way. As discussed in **Checklist Section XVII, Transportation**, in the event that lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with the Construction Management Plan (see PDF TR-1) that would be implemented to ensure adequate emergency access and circulation.

With regards to operation, the Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would continue to be provided from Stadium way.

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[117] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2021.*

[118] *Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, website: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/disaster_rdm-South.pdf, accessed November 2021.*

The Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As discussed in **Checklist Section XV, Public Services**, the Project's proposed design, including ingress/egress and internal circulation, would be subject to review and approval by the Los Angeles fire and police departments. The Project would also introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed under **Checklist Section XVII, Transportation**, the Project would result in less-than-significant traffic impacts. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806.

Based on the above, emergency access to the Project Site and surrounding uses would be maintained at all times. As such, the Project would not Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone and a Hillside Area.[119] However, as discussed in response to **Checklist Question IX(g),** areas designated within a Very High Fire Hazard Severity Zone are required to be designed and constructed in accordance with the design requirements of the Los Angeles Fire Code, including, but not limited to, the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with LAFD to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Additionally, owners of the proposed residences would be required to maintain

[119] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2021.*

defensible space per regulation found in the California Public Resources Code 4291 as applicable. As such, the Project would not exacerbate wildfire risks. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project would involve the demolition of an existing building and construction of a new building in a highly urbanized area in the Silver Lake—Echo Park—Elysian Valley Community Plan Area of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project would be limited to the boundaries of the Project Site and would not include construction activities in the surrounding hillsides such that stability of the surrounding hillsides would be compromised. Furthermore, as detailed in **Section X, Hydrology and Water Quality**, pursuant to LID development requirements, the Project would be prohibited from increasing the volume of stormwater that would flow from the Project Site to the adjacent streets. Accordingly, the Project would not expose people or structures to significant risks as a result of runoff, slope instability, or drainage changes. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

Less than Significant Impact with Mitigation Incorporated. *State CEQA Guidelines* Section 15065(a) requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in *State CEQA Guidelines* Section 15382 as "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

As indicated by the analysis in **Checklist Section IV, Biological Resources**, following implementation of mitigation measure **MM BIO-1** through **MM BIO-11**, the Project would not significantly impact biological resources, including candidate, sensitive, or special status species; riparian habitat or other sensitive natural community; state or federally protected wetlands; native resident or migratory wildlife corridors or nursery sites; or protected trees. As such, the Project

would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in **Checklist Sections V, Cultural Resources**, **VII, Geology and Soils**, and **XVIII, Tribal Cultural Resources**, with the implementation of mitigation measure **MM TCR-1**, the Project would have less than significant impacts on cultural resources, including historical and archaeological resources and human remains; paleontological resources; and tribal cultural resources. As such, the Project would not eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant and no further mitigation would be required.

Mitigation Measures

MM BIO-1 through **MM BIO-11** (see **Checklist Question IV(e)**) and **MM TCR-1** (see **Checklist Questions XVIII(a)** and **XVIII(b)**).

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 with Mitigation Incorporated. Cumulative impacts refer to two or more individual effects which, when evaluated together, are considerable or would compound or increase other environmental effects. In the preceding topical analyses, cumulative impacts of the Project have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the South Coast Air Basin, and the evaluation of traffic impacts considered the future traffic growth conditions that could be expected to result from regional and local growth in the vicinity. As discussed throughout this IS/MND, no significant impacts after mitigation are identified for the Project. In addition, any successive projects of the same type and nature would reflect a development that is consistent with the underlying land use designation and the LAMC, and thus would be subject to the same regulations and requirements, including development standards and conditions of approval. The impacts of each subsequent project would be mitigated if necessary, and thus will not result in a cumulative impact. As such, the Project would not have the potential to contribute to significant cumulative impacts. Therefore, cumulative impacts would be less than significant, and no further mitigation would be required.

Mitigation Measures

MM BIO-1 through **MM BIO-11** (see **Checklist Question IV(e)**), **MM NOI-1** (see **Checklist Question XIII(b)**) **MM TR-1** (see **Checklist Question XVII(b)**), and **MM TCR-1** (see **Checklist Questions XVIII(a)** and **XVIII(b)**).

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

Less than Significant Impact with Mitigation. As required by *State CEQA Guidelines* Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause

substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, utilities and service systems, and wildfire. These changes are addressed in **Checklist Sections III, Air Quality; VII, Geology and Soils; VIII, Greenhouse Gas Emissions; IX, Hazards and Hazardous Materials; X, Hydrology and Water Quality; XIII, Noise; XIV, Population and Housing; XV, Public Services; XVII, Transportation; XIV, Utilities and Service Systems;** and **XX, Wildfire** of this IS/MND.

As detailed in these sections, all potential impacts of the Project have been identified, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant levels. Upon implementation of mitigation measures identified and compliance with existing regulations and conditions of approval, the Project would not have the potential to result in substantial adverse impacts on human beings, either directly or indirectly. Therefore, impacts would be less than significant with mitigation and no further mitigation measures would be required.

Mitigation Measures

None required.

5 PROJECT DESIGN FEATURES AND MITIGATION MEASURES

5.1 PROJECT DESIGN FEATURES

As part of the Project, the Applicant has agreed to implement the following project design features:

PDF TR-1 Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction related Project representatives (i.e., construction contractors) whose projects would potentially be under construction at around the same time as the Project would be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination would ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The Construction Management Plan would include, but not be limited to, the following elements as appropriate:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets would be prohibited.
- Worker parking would be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way would be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., would be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles would be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists would be obtained through such measures as alternate routing and protection barriers as appropriate.

- Covered walkways would be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant would keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk would be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians would be routed around any such lane or sidewalk closures.
- The locations of the off-site truck staging would be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route and do not travel through residential neighborhoods.

PDF TR-2 The Project includes one TDM measure that reduces trips and VMT through TDM strategies and is included in the VMT analysis for the Project. This TDM project feature, as described by LADOT'S TAG, is listed below:

BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC – This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 24 bicycle parking spaces.

5.2 MITIGATION MEASURES

Based on the preceding analysis in this IS/MND, the Project would require the following mitigation measures:

5.2.1 Biological Resources

MM BIO-1 **Contractor Responsibility.** The project applicant will ensure that all contractors have read and are familiar with the requirements laid out in these tree protection mitigation measures. A copy of this document and the Protected Tree Plan shall be kept on site at all times. It is the contractor's responsibility to become familiar with all the tree protection measures described below and to adhere to them as they apply to their portion of the work.

MM BIO-2 **Project Arborist**. The Project Applicant shall obtain a Project Arborist onsite to provide construction monitoring of certain construction activities. It is the applicant's responsibility to contract a Project Arborist that will be present for construction monitoring and project milestones as indicated in this report. We will provide our Project Arborist contract if requested by the applicant, but the applicant may hire any certified arborist of their choosing to fulfill this role. It is also the applicant's responsibility to notify the Project Arborist when those milestones requiring arborist presence are reached. The Project Arborist shall be provided with 72 hours of notification prior to their required onsite presence to conduct the construction monitoring. The Project Arborist shall be required to monitor the following:

- Clearing or grading;
- Any digging, excavating, trenching, or building within the canopy dripline of any protected tree;
- Any pruning of any protected tree's canopy or roots takes place; and
- Any other activity within the canopy dripline of any protected tree.

MM BIO-3 **General Tree Protection Measures**. The following general tree protection measures shall be applied where they are relevant. If there is a conflict between the Specific tree protection measures for this Project above and any of these General tree protection measures, the Specific tree protection measures shall supersede:

- All work conducted in the ground within the root protection zone of any protected tree shall be accomplished with hand tools only. The root protection zone is defined as the area within a circle with a radius equal to the greatest distance from the trunk to any overhanging foliage in the canopy.
- Where structural footings are required and major roots will be impacted, the footing depth shall be reduced to 12 inches. This may require additional "rebar" for added strength. An alternative shall involve bridging footings over roots and covering each root with plastic cloth and 2 to 4 inches of Styrofoam matting before pouring concrete.
- Any required trenching which has multiple trench path options shall be routed in such a manner to minimize root damage. Radial trenching is less harmful than tangential trenching because it runs parallel to tree roots rather than diagonal or perpendicular to them. Whenever possible trenching shall work around roots rather than cutting them. Pipes and cables shall be placed below uncut roots, and the same trench shall be utilized for as many utilities as possible.
- "Natural" or pre-construction grade shall be maintained for as great a distance from the trunk of each tree as construction permits. At no time during or after construction shall soil be in contact with the trunk of the tree above natural grade.
- In areas where grade would be lowered, or where footings would be dug, some root cutting may be unavoidable. Cuts shall be made cleanly with a sharp saw or pruning tool, far enough behind the damage that all split and cracked root portions are removed. The cut shall be made at right angles to the root so that the wound is no larger than necessary. When practical, roots shall be back to a branching lateral root. Applying pruning wound treatment (e.g. "Tree Seal") to cuts shall be prohibited.
- When removing pavement, as little disruption of soil as necessary shall be attempted. This may mean using hand tools within the root protection zone of protected trees. It may also mean removing the pavement in a backwards

direction away from the trunks of protected trees, while keeping personnel and equipment on the pavement as it is removed.

- Pruning of oaks shall be limited to the removal of dead wood and the correction of potentially hazardous conditions, as evaluated by a qualified arborist. Pruning oaks excessively is harmful to them. Removal or reduction of major structural limbs shall be done only as required for actual building clearance or safety. If limbs must be removed, cuts shall be made perpendicular to the branch, to limit the size of the cut face. The branch bark collar shall be preserved (i.e. no "flush cuts"), and cuts shall be made in such a way as to prevent the tearing of bark from the tree. All pruning shall be done in accordance with ANSI A-300 pruning standards. Applying pruning wound treatment (e.g. "Tree Seal") to cuts shall be prohibited.
- To minimize soil compaction, all activity and traffic within the root protection zone shall be kept to a minimum.
- The root protection zone shall not be subjected to flooding incidental to the construction work, or to disposal of construction debris such as paints, plasters, or chemical solutions. No equipment fueling or chemical mixing shall be done within the root protection zone.
- The amount of environmental change, including drastic increases or decreases in the amount or frequency of watering from historic conditions, which trees would be subjected to shall be minimized.
- Care shall be exercised not to allow equipment to physically damage the tree's trunk, root crown, or lower scaffold branches during construction. This includes but is not limited to 1) impact damage by scrapers, buckets, or hoes; or 2) damage by tires, wheels, or tracks from operating in close proximity to trees.

MM BIO-4 **Order of Tree Protection Operations**. The following order of operations shall be consulted and followed in order to ensure best implementation of tree protection measures:

5. Prior to the start of any demolition or construction, protective fencing shall be installed as shown on the Protected Tree Plan and according to mitigation measure **MM BIO-5**.
6. After protective fencing is installed and verified by the Project Arborist, demolition and construction activities may commence.
7. Prior to excavation and construction of the parking area, an exploratory trench shall be dug near Tree 20 to determine root presence along the parking area curb in accordance with **MM BIO-7**. The Project Arborist shall inspect the trench before any work in the parking area commences.
8. Only after all demolition and construction outside the protective fencing areas is complete, protective fencing may be removed and work inside the protective fencing areas may commence. This includes demolition of remaining asphalt north of Tree 32, grubbing and landscaping activities.

MM BIO-5 **Protective Fencing**. Prior to the start of construction or demolition activities, protective fencing shall be installed as shown on the enclosed Protected Tree Plan. The Project Applicant shall ensure that the installed protective fencing is photographed for submittal to the City of LA Urban Forestry Department along with the Tree Report. The Project Arborist shall inspect all protective fencing upon installation. Fencing shall be chain-link, at least 5 feet high, and held in place by steel stakes driven directly into the ground.

There shall be no easy access into the protective fencing area. If a gate in the protective fencing is necessary, it shall be padlocked during construction activities with limited, authorized access only. A durable sign shall be securely affixed to the fencing that reads:

PROTECTED TREE
This fence shall not be moved or entered without authorization
[insert appropriate project contact information]

All protective fencing shall remain intact until construction is completed. No workers shall enter the fenced protection zones. No debris or equipment storage, waste disposal, equipment cleanout, outhouse, or vehicle parking shall be allowed within the fenced areas.

Protective fencing shall remain in place throughout demolition and construction and shall only be removed near the end of the project when asphalt demolition, grubbing, and landscaping inside the fenced areas is ready to begin.

MM BIO-6 **Demolition of Building 26 and Cement Slab Near Tree 19 and Tree 20**. Care shall be taken to minimize damage to the root systems and canopies of Tree 19 and Tree 20 during demolition of the Building 26 and the cement slab. The structures shall be demolished using manual labor (no machinery) within the canopy driplines. Demolition of the foundations shall be done in a backwards direction within the canopy driplines, starting closest to the trunks of the trees and working away from them. All personnel, equipment, and debris shall remain on the foundation as it is removed to prevent disturbance of the exposed soil under the canopy driplines.

MM BIO-7 **Exploratory Trenching Near Tree 20**. Prior to excavation and construction of the parking lot proposed for the central portion of the Project Site, an exploratory trench shall be dug along the parking area curb edge within 15 feet of the trunk of Tree 20. The trench shall be as deep as the required excavation and subgrade activity for the curb and parking area, and as wide as necessary (away from the tree) to accommodate digging. The exploratory trench shall be dug using hand tools or an AirSpade only, and any roots less than two inches in diameter shall be cut cleanly using a sharp saw or pruning tool. No roots two inches or larger in diameter shall be cut during digging. The Project Arborist shall inspect the exploratory trench and the exposed roots that are two inches or larger in diameter and provide mitigation recommendations accordingly.

MM BIO-8 **Excavation Near Tree 22 and Tree 23**. If roots are encountered during excavation for the parking area curb near Tree 22 and Tree 23, cuts shall be made cleanly

with a sharp saw or pruning tool, far enough behind any damage that all split and cracked root portions are removed. The cut shall be made at right angles to the root so that the wound is no larger than necessary. When practical, cut roots back to a branching lateral root. Applying pruning wound treatment (e.g. "Tree Seal") to cuts shall be prohibited.

MM BIO-9 **Safety Pruning of Tree 19 and Tree 20**. The Project Arborist shall be consulted prior to safety pruning of Tree 19 and Tree 20. Any pruning shall be carried out by an ISA Certified Arborist, or under the direction of the Project Arborist. All pruning shall conform to ANSI A-300 pruning standards at a minimum.

MM BIO-10 **Landscaping Around Oak Trees**. When designing and installing landscaping and irrigation around existing protected oak trees, the following guidelines shall be followed:

- Grubbing work shall be done carefully to prevent damage to the roots of oak trees within 10 feet of their trunks. Any grubbing work within the protective fencing areas shall be completed after construction on the site is complete and protective fencing is ready to be removed;
- No planting of any type, irrigation, or irrigation overspray shall occur within 10 feet of any oak trunk;
- Only drought tolerant or native plants shall be planted within 20 feet of any oak trunk;
- No lawn or groundcover requiring frequent irrigation shall be planted within the canopy dripline of any oak tree;
- Three to four inches of organic mulch (freshly chipped tree trimmings) shall be maintained within 20 feet of oak trunks, wherever possible; and
- Underground irrigation lines shall be kept out of the oak canopy dripline to the extent possible, and shall be installed (when they are necessary within the dripline) without doing any root damage to the oak tree. Irrigation trenching within the canopy dripline of any oak shall be done using hand tools only.

MM-BIO 11 **Demolition of Asphalt Near Tree 32.** Asphalt located inside the protective fencing area near Tree 32 shall remain in place until demolition and construction outside the fenced area are complete and only work inside the fenced area remains. The asphalt shall be removed carefully using hand tools only. Care shall be taken not to damage roots under the asphalt with tools or debris. **If any roots measuring two inches in diameter or larger are encountered, work shall cease and the Project Arborist shall be consulted on how to proceed.**

5.2.2 Noise

MM NOI-1: The construction contractor shall avoid using large bulldozer within 20 feet or vibratory rollers within 36 feet of the façades of the on-site historic buildings listed as contributors to the historic district on the BRH campus.

5.2.3 Transportation

MM TR-1 TDM Program Project Mitigation: The Project proposes an additional TDM measure as mitigation to reduce trips and VMT and is included in the VMT analysis for the Project. This TDM mitigation, as described by LADOT's TAG, is listed below:

EDUCATION & ENCOURAGEMENT – Promotions and Marketing – This TDM strategy involves uses of market and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive education and promotional tools such as posters, information boards and/or website with information that a traveler could choose to read at their leisure.

5.2.4 Tribal Cultural Resources

MM TCR-1. Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors/consultants from the Gabrieleno Band of Mission Indians-Kizh Nation that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s)/consultant shall be approved by the Gabrieleno Band of Mission Indians-Kizh Nation Tribal Government. A qualified archaeologist/ archaeological monitor shall be identified as principal personnel who must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The archaeologist shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the City has determined that the Project site has a low potential for impacting tribal cultural resources after consultation with the tribal monitor/consultant and archaeologist.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor/ consultant, shall provide Worker Environmental Awareness Program ("WEAP") training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance

activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

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

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the immediate vicinity of the find until the find can be assessed by the archaeologist and tribal monitor/consultant.

2. If the archaeologist and the tribal monitor/consultant determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if the archaeologist, in consultation with the tribal monitor/consultant, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state, or local law, rule or regulation. Any discrepancies between the implementation of the recommendations shall be resolved through the City as the Lead Agency, in consultation with the archaeologist and tribal monitor/consultant.

5. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

6. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center ("SCCIC") at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

8. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.