Section 6. Sustainable Communities Environmental Analysis

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387).

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Transit Priority Project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. The following analysis discusses the following topics:

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

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide directions in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as a basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency – in this case, the DCP – retains the authority to determine significance thresholds on a

case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. The Thresholds Guide also states it is not intended as substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, if states “because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.

In light of an evolving regulatory environment, recent case, law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this SCEA, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

Additionally, in January 2018, OPR published comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this SCEA.

With respect to traffic/transportation impacts, recent changes have been implemented to Section 15064.3 of the State CEQA Guidelines, in which vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA, compared to the previous Level of Service (LOS) methodology. CEQA Guidelines Section 15064.3(c) state the provisions of Section 15064.3 shall apply statewide beginning on January 1, 2020 but that a lead agency may elect to be governed by its provisions immediately upon adoption. On July 30, 2019, the City adopted the VMT threshold and methodology. Therefore, in response to this action, the Traffic/Transportation Section of this SCEA is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the proposed Project.

1. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743),[25] which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "Transit Priority Area" as an area within one-half mile of a Major Transit Stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the

[25] *SB 743 is codified as Public Resources Code Section 21099.*

morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the *L.A. CEQA Thresholds Guide* (2006).

The Project Site meets the definition of Infill Site as it is currently developed with several buildings and a surface parking lot. The Project Site is located in a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[26] Pursuant to the guidance in ZI-2452, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA. The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. The Project Site's proximity to the Vermont/Beverly Rail Station (less than 500 feet) provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project include (Metro Local Lines 14/37, 201, 204, Rapid Line 754, and the Metro Rail Red Line). The LADOT DASH line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1st Street.

Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, an assessment of the Project's potential aesthetics impacts is not required.

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

This discussion is for informational purposes only.

No Impact. No scenic views or vistas characterize the Project Site or immediately surrounding project area. The Project Site is located in the Wilshire Community Plan Area.

[26] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed May 2019.*

The surrounding properties are developed with residential (including permanent supportive housing), commercial and light industrial/manufacturing uses. For this reason, even if the Proposed Project were subject to analysis of aesthetic impacts, the Proposed Project would not have the potential to 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, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

This discussion is for informational purposes only.

Less Than Significant Impact. The Project Site is developed with three commercial buildings, three single-family residential buildings, an office building and a surface parking lot. There are no rock outcroppings or unique geologic features on the Project Site. As discussed in Section 6.5, Cultural Resources, there are no historic resources on the Project Site. The Project Site is not bordered by or within the viewshed of any designated state scenic highways identified in the Mobility Element of the City of Los Angeles General Plan. Neither Oakwood Avenue, Madison Avenue, Juanita Avenue, nor Beverly Boulevard are designated as a state scenic highway. The Project Site does not contain any locally protected tree species.[27] There are three non-protected significant trees[28] on the Project Site and four street trees within the public right-of-way on Oakwood Avenue. The three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four street trees, three are proposed to remain in place and one is proposed for removal. The Red Cedar tree and two Canary Palms would remain in place, while the Weeping fig tree is proposed to be removed. As noted in the Tree Report, the Weeping Fig appears to have been intentionally planted by someone, but is recommended to be removed to allow for proper growing distance and preservation of the actual street trees. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry and replacement trees would be provided in accordance with the Urban Forestry's permit conditions. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, the impacts to scenic resources would be less than significant.

[27] *See Tree Report in Appendix K to this SCEA.*

[28] *Significant trees are defined as having a diameter at breast height of 8" or more.*

c) In non-urbanized areas, substantially degrade the existing visual character or quality 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?

This discussion is for informational purposes only.

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with a two-story office building above a one-level partially subterranean garage, three commercial buildings, three single-family residential buildings, and one surface parking lot. The Project Site is currently zoned M1-1 and has a land use designation of Limited Manufacturing. There is no height limit for development on the Project Site. The Proposed Project includes the demolition of the existing three commercial buildings, the three single-family residential buildings and surface parking lot; the renovation of the existing two-story 5,663 square foot office building above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings with support services.

As part of the construction process, the Applicant will install a temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory measures will further reduce visual impacts caused during the construction of the Proposed Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 14.4.17, the Applicant is also required to maintain the construction barrier to be free and clear of any unauthorized signs and graffiti within 24 hours of occurrence. Compliance with these regulatory requirements will ensure the scenic quality of the Project Site during construction.

With respect to building design, the buildings have a single elevation, reaching a maximum building height of 95 feet. Exterior building materials/features include metal railings, composite siding, fiber cement siding, standing seam siding, vinyl clad windows and doors. As discussed in further detail in Section 6.11, Land Use, with approval of discretionary requests identified in Section 3, Project Description, the Proposed Project is in conformance with the Residential Citywide Design Guidelines, the Los Angeles Municipal Code (LAMC), and the applicable provisions of the General Plan governing scenic quality. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.

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

This discussion is for informational purposes only.

No Impact. The determination of whether a proposed project results in a significant nighttime illumination impact is generally made considering the following factors: (a) the change in ambient illumination levels as a result of the project sources; and (b) the extent to which the project lighting would spill off the project site and affect adjacent light-sensitive areas. Exterior lighting features within the Proposed Project consist of low-level illuminated pedestrian walkways and lighting within common open space areas and outdoor courtyards. On-site signage includes site identity and wayfinding signs in accordance with the LAMC. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, As such, no impacts would occur with respect to the Proposed Project's lighting impacts and impacts related to light trespass or glare.

Cumulative Impacts

This discussion is for informational purposes only.

Less Than Significant. As mentioned above, PRC Section 21099 provides that the aesthetic impacts of a residential project, such as the Proposed Project, upon an Infill Site within a Transit Priority Area shall not be considered significant impacts on the environment. For these reasons, even if the Proposed Project were subject to analysis of aesthetic impacts, cumulative aesthetic impacts would be less than significant.

6.2 Agriculture and Forestry Resources

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

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

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project Site is currently occupied by three commercial buildings, three one-story single-family residential buildings, a two-story office building, and one surface parking lot. The Project Site is also located in an urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are

not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[29] Therefore, no impact to agricultural lands would occur.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is zoned M1-1 with a General Plan land use designation of Limited Manufacturing. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[30] Therefore, no impact would occur.

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

No Impact. The Project Site is zoned M1-1 and has a land use designation of Limited Manufacturing in the Wilshire Community Plan Area. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is occupied by three commercial buildings, three single-family residential buildings, one two-story office building above a one-level partially subterranean garage, and one surface parking lot. The Project Site is also located in a highly urbanized area of the City of Los Angeles. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles

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[29] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed May 2019.*

[30] *Williamson Act Program, California Division of Land Resource Protection, website ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf, accessed May 2019.*

County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site is not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[31] The Project Site is located in a highly urbanized area in the Wilshire Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

6.3 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?	☐	☐	☒	☐

[31] *Ibid.*

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

Less Than Significant Impact. A significant air quality impact may occur if the Proposed 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. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable AQMP is prepared by the South Coast Air Quality Management District (SCAQMD), which is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 ("2016 AQMP"). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

In addition, SCAG approved their 2016 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and the State Implementation Plan (SIP) for the Air Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Section 6.14, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as an area within one half-mile of a Major Transit Stop High Quality Transit Corridor. The Proposed Project would concentrate new development and jobs within walking distance of the Vermont/Beverly Rail Station and several Metro bus lines that connect to all regions of the Los Angeles area. Thus, the Project Site's location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips. The Project Site is also located in a Transit Priority Area which is defined as an area within one-half mile of a Major Transit Stop. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency (EPA) and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption.[32] The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone (O_3), PM_{10} (respirable particulate matter) and $PM_{2.5}$ (fine particulate matter), related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific

[32] *See State of California Office of Planning and Research, Changes to CEQA for Transit Oriented Development – FAQ, accessed April 1, 2020.*

impacts.[33] Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed below, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2023. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; (4) architectural coating/finishing. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table 6.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control

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

Table 6.1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition/						
On-Site Fugitive Dust	--	--	--	--	0.21	0.03
On-Site Off-Road Diesel Equipment	2.00	19.70	14.49	0.02	1.04	0.97
Off-Site Hauling/Vendor/Worker	0.07	0.39	0.59	<0.01	0.16	0.04
Total Emissions	***2.07***	***20.09***	***15.08***	***0.02***	***1.41***	***1.04***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Site Clearing						
On-Site Fugitive Dust	--	--	--	--	0.22	0.02
On-Site Off-Road Diesel Equipment	1.55	18.29	10.75	0.02	0.70	0.65
Off-Site Hauling/Vendor/Worker	0.16	3.83	1.25	0.01	0.36	0.11
Total Emissions	***1.71***	***22.12***	***12.00***	***0.03***	***1.28***	***0.78***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	2.75	1.49
On-Site Off-Road Diesel Equipment	1.83	20.21	9.76	0.02	0.92	0.84
Off-Site Hauling/Vendor/Worker	0.14	3.17	1.15	0.01	0.34	0.10
Total Emissions	***1.97***	***23.38***	***10.91***	***0.03***	***4.01***	***1.33***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	2.05	16.03	14.56	0.03	0.82	0.78
Off-Site Hauling/Vendor/Worker	1.72	5.81	14.41	0.05	4.01	1.10
Total Emissions	***3.77***	***21.84***	***28.97***	***0.08***	***4.83***	***1.88***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Paving						
On-Site Off-Road Diesel Equipment	0.94	9.33	11.70	0.02	0.49	0.45
Off-Site Hauling/Vendor/Worker	0.06	0.04	0.56	<0.01	0.17	0.05
Total Emissions	***1.00***	***9.37***	***12.26***	***0.02***	***0.66***	***0.50***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	16.32	--	--	--	0.00	0.00
On-Site Off-Road Diesel Equipment	1.10	8.90	12.27	0.02	0.46	0.45
Off-Site Hauling/Vendor/Worker	0.29	0.19	2.42	<0.01	0.73	0.20
Total Emissions	***17.71***	***9.09***	***14.69***	***0.02***	***1.19***	***0.65***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

measures and compliance with the following SCAQMD Rules and regulations would be implemented as part of the Proposed Project during each phase of construction: .

- Site Clearing, Grading and Construction Activities: Compliance with provisions of the SCAQMD District Rule 403. The Proposed Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:

    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
    - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    - Trucks having no current hauling activity shall not idle but be turned off.

- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound (VOC) Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

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

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet

specified fuel and fuel additive requirements and emission standards.

- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

- The Proposed Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.

- The Proposed Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

- New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

As shown in Table 6.1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Operational Emissions

Existing Emissions

The Project Site is currently developed with three one-story commercial buildings used for the commercial operation of a telecommunications company, three one-story single-family residential buildings, and one surface parking lot, which serves as the existing conditions baseline. Additionally, the Project Site includes a 5,663 square-foot two-story office building above a one-level partially subterranean garage at 3838 Oakwood Avenue.[34] The existing uses generate air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*). As shown in Table 6.2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

[34] *The existing office building at 3838 Oakwood Avenue was not included within the Existing Operations emissions in Table 6.2 as it is not a part of the development site and no changes are proposed to the current land use or occupied floor area.*

Table 6.2
Existing Daily Operational Emissions from Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	0.21	<0.01	0.25	<0.01	<0.01	<0.01
Energy Sources	<0.01	0.06	0.04	<0.01	<0.01	<0.01
Mobile Sources	0.43	2.10	6.51	0.02	1.56	0.43
Total Emissions	***0.64***	***2.16***	***6.80***	***0.02***	***1.56***	***0.43***
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.21	<0.01	0.25	<0.01	<0.01	<0.01
Energy Sources	<0.01	0.06	0.04	<0.01	<0.01	<0.01
Mobile Sources	0.42	2.18	6.14	0.02	1.56	0.43
Total Emissions	***0.63***	***2.24***	***6.43***	***0.02***	***1.56***	***0.43***

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

Proposed Project Emissions

The Proposed Project includes the demolition of three existing commercial buildings used for the commercial operation of a telecommunications company, three existing single-family residential buildings, and one surface parking lot; the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage; and the construction, operation, and maintenance of five eight-story multi-family buildings with 454 dwelling units, and 11,772 square feet of ground floor supportive services. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table 6.3, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table 6.3
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	6.46	0.43	37.46	<0.01	0.21	0.21
Energy Sources	0.12	1.01	0.43	<0.01	0.08	0.08
Mobile Sources	0.95	3.94	13.14	0.05	4.23	1.16
Stationary Sources	3.28	14.68	8.37	0.02	0.48	0.48
Total Project Emissions	***10.81***	***20.06***	***59.40***	***0.07***	***5.00***	***1.93***
Less Existing On-Site Emissions	*(0.64)*	*(2.16)*	*(6.80)*	*(0.02)*	*(1.56)*	*(0.43)*
NET Project Emissions	**10.17**	**17.90**	**52.60**	**0.05**	**3.44**	**1.50**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area Sources	6.46	0.43	37.46	<0.01	0.21	0.21
Energy Sources	0.12	1.01	0.43	<0.01	0.08	0.08
Mobile Sources	0.92	4.04	12.42	0.05	4.23	1.16
Stationary Sources	3.28	14.68	8.37	0.02	0.48	0.48
Total Project Emissions	***10.78***	***20.16***	***58.68***	***0.07***	***5.00***	***1.93***
Less Existing On-Site Emissions	*(0.63)*	*(2.24)*	*(6.43)*	*(0.02)*	*(1.56)*	*(0.43)*
NET Project Emissions	**10.15**	**17.92**	**52.25**	**0.05**	**3.44**	**1.50**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

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. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[35]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the number of pounds of emissions per day that can be generated by a project that would

[35] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[36] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the portion of the Project Site to be graded is approximately two acres, the two-acre LSTs were conservatively applied for the Proposed Project. There are 10 sensitive receptors located within 500 feet of the Project Site that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project. These sensitive receptors are identified in Figure 6.1, Air Quality Sensitive Receptors. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a two-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.[37]

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose nearby sensitive receptors to harmful pollutant concentrations. However, as shown in Table 6.4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate two-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during construction, as required by

[36] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

[37] *This threshold addresses all sensitive receptors within a 25 meter radius of the Project Site.*

Source: Google Earth, Aerial View, 2019.

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Figure 6.1
Air Quality Sensitive Receptors

Table 6.4
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition	19.70	14.49	1.25	1.00
Site Clearing	18.29	10.75	0.92	0.67
Grading/Excavation	20.21	9.76	3.67	2.33
Building Construction	16.03	14.56	0.82	0.78
Paving	9.33	11.70	0.49	0.45
Architectural Coatings	8.90	12.26	0.46	0.45
SCAQMD Localized Thresholds [c]	**108**	**1,048**	**8**	**5**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

[a] *The localized thresholds for all phases are based on a receptor within a distance of 25 meters in SCAQMD's SRA 1 for a Project Site of two acres.*
[b] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this SCEA.

SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Air Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). The Basin has been in attainment for CO since 2007, and CO levels in SRA 1 remain substantially below the federal and state standards. The maximum CO levels in the Basin during 2016 were recorded at 1.9 ppm (parts per million) (one-hour average) and 1.4 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour

average) and 9.0 ppm (eight-hour average).[38] In its 2003 AQMP, the SCAQMD conducted CO hot-spot analyses at the four worst-case intersections in the Air Basin. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. The data provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at all four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing [2003] background CO concentrations, the worst-case CO levels in the Basin was estimated to be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), respectively, which is below the CO thresholds of significance for both the CAAQS and NAAQS. The AQMP therefore concluded that because the Basin is in attainment for CO, and the studied congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. As discussed above, recent ambient CO levels in 2016 are substantially lower than they were in 2003. The volume of traffic at the closest study intersections, Intersection #4, Vermont Avenue and Oakwood Avenue; Intersection #5, Vermont Avenue and Beverly Boulevard; and Intersection #9, Beverly Boulevard and Temple Street and Westmoreland Avenue are substantially lower than the studied intersections in the 2003 AQMP study. Therefore, it is reasonable to conclude that the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction TAC Emissions

The Proposed Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk.

[38] *The most recent annual ambient air quality data is for the year 2016, http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2016-air-quality-data-tables.pdf?sfvrsn=14, accessed May 2019.*

Specifically, “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 24 months, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risks are anticipated after construction. Because there is such a short-term exposure period (24 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Operational Emissions

The Proposed Project consists of a residential development and would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. As such no significant toxic airborne emissions would result from Proposed Project implementation. In addition, construction activities 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. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Potential sources that may emit odors during construction activities at the Proposed Project include the use of architectural coatings, solvents, and asphalt paving during construction. The Proposed Project will comply with SCAQMD Rules 1108 and 1113, which limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively.

With respect to operations, odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Proposed Project would have the potential to generate foul odors if the areas are located in close

proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) and 1139 (Odors), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations. Therefore, potential operational odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an increase in construction and operational emissions in an already highly urbanized area of the City of Los Angeles.

AQMP Consistency

Cumulative development can affect implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the Proposed Project and each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Moreover, none of the related projects are located in close enough proximity to the Proposed Project as to cause cumulative odor impacts. Furthermore, based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would not combine with other projects to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and 1139 (Odors) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Proposed Project's long-term operations. Thus, cumulative odor impacts would be less than significant**.**

6.4 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, and 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?	☐	☐	☒	☐

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. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is located in an urbanized area in the City of Los Angeles and is improved with three commercial buildings, three single-family residential buildings, a two-story office building above a one-level partially subterranean garage, and a surface parking lot. The Project Site does not contain any critical habitat or support 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. Based on the Proposed Project's Tree Report contained in Appendix K to this SCEA, no protected native tree species are located on-site or in the public right-of-way adjacent to the Project Site. There are three non-protected significant trees[39] on the

[39] *Significant trees are defined as having a diameter at breast height of 8" or more.*

Project Site and four street trees within the public right-of-way on Oakwood Avenue. The three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four public street trees, three will be retained in place and one is proposed for removal. The Red Cedar tree and two Canary Palms are recommended to remain in place, while the Weeping Fig tree is proposed to be removed. As noted in the Tree Report, the Weeping Fig appears to have been intentionally planted by someone, but is recommended to be removed to allow for proper growing distance and preservation of the actual street trees. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry and replacement trees would be provided in accordance with the Urban Forestry's permit conditions. Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected on-site trees and public trees.

The removal of vegetation and disturbances to potential bird habitat creates the potential to result in a take[40] of nesting native bird species. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The Applicant will be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees located on the Project Site. As a standard practice, the Department of Building and Safety generally imposes a condition that requires grading and earthwork activities (including disturbances to native and non-native vegetation, structures and substrates) to take place outside of the breeding bird season which generally runs from March 1 – August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If the Proposed Project's activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the Applicant would be required to arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. If a protected native bird is found, the Applicant would be required to delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species

[40] *Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Wildlife Code Section 86).*

until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Therefore, with adherence to existing laws and regulations, the Proposed Project would have a less than significant impact on sensitive biological species or habitat.

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. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by three commercial buildings, three single-family residential buildings, and a surface parking lot. No riparian or other sensitive natural community is located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would result in no impact to riparian habitat or other sensitive natural communities.

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. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act (CWA). The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 6.4, above) and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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

No Impact. A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may

diminish the chances for long-term survival of a sensitive species. The Project Site is improved with three commercial buildings, three single-family residential buildings, and a surface parking lot. Vegetation in the vicinity of the Project Site is limited to ornamental landscaping. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. Therefore, the Proposed Project would not substantially interfere with the movement of any resident or migratory fish or wildlife species, therefore no impact would occur.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As discussed above, the Project Site does not contain any locally protected tree species.[41] Three on-site Queen Palm trees will be removed and replaced in accordance with Department of City Planning policies. As shown on the Landscape Plan, the Proposed Project will provide approximately 7,627 square feet of landscaped open space with 114 trees. Of the four public street trees, one is proposed for removal. Tree removals within the public right-of-way are subject to the review and approval of the Department of Urban Forestry and replacement trees would be provided in accordance with the Urban Forestry's permit conditions. As such, all tree removals would be in conformance with the City's protected Native Tree Ordinance and subject to Urban Forestry's permit approval process. Thus, the Proposed Project would not conflict with any local policies, or ordinances protecting biological resources and impacts would be considered less than significant.

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. A significant impact would occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

[41] *See Tree Report in Appendix K to this SCEA.*

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with adherence to applicable regulatory compliance measures. Development of the Proposed Project in combination with related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Moreover, development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. Thus, cumulative impacts to biological resources would be less than significant.

6.5 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 (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))??	☐	☐	☒	☐

This section summarizes and incorporates by reference information from the following report:

B.1: Historical Built Environment Report for the Enlightenment Plaza / Juanita Avenue Project, City of Los Angeles, California ("Historic Resource Assessment"), prepared by Dudek, dated April 2020.

B.2: Archaeological and Paleontological Resources Assessment for the Enlightenment Plaza / Juanita Avenue Project, Los Angeles, California

("Archaeological and Paleontological Resource Assessment"), prepared by Dudek, dated April 22, 2020.

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

No Impact. A significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. State CEQA Guidelines Section 15064.5 defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in 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. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[42]

Section 15064.5(b)(2) of the CEQA Guidelines provides that "[t]he significance of an historical resource is materially impaired when a project:

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

[42] CEQA Guidelines, Section 15064.5(b)(1).

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

The Project Site is currently occupied by three commercial buildings used for the commercial operation of a telecommunications company, three single-family residential buildings, and a paved surface parking lot. The Proposed Project includes demolition of these existing buildings, the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage, and the construction, operation, and maintenance of five eight-story multi-family buildings.

The Project Site does not contain any on-site structures listed on the National Register of Historic Resources (NRHP), California Register of Historic Resources (CRHR), or City of Los Angeles Historic Cultural Monument (HCM)[43,44] or listed as potentially historic resources on the City of Los Angeles's citywide survey (SurveyLA).[45] Additionally, there are no off-site historic resources within the vicinity of the Proposed Project. Therefore, the development of the Proposed Project would have no impact to historical resources.

The Historic Resource Assessment (see Appendix B.1 to this SCEA) provides an analysis of the manufacturing buildings and residential buildings on the Project Site. The Historic Resource Assessment's findings for 3820 Oakwood Avenue[46], 3812 Oakwood Avenue, and 316 Juanita Avenue are discussed below.

3820 Oakwood Avenue:

Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

Archival research did not find any association with events that have made significant contributions to the broad patterns of local or regional history. 3820 Oakwood Avenue was established in 1963 as Stanley Construction Company office space, during a period of commercial and industrial growth in the area. The construction of the building was merely following this pattern of development in the area and there is no indication that the construction of this specific business marked a pivotal point in the history of Los Angeles.

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[43] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed May 2019.*

[44] *City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, website: http://historicplacesla.org/map, accessed May 2019.*

[45] *City of Los Angeles, Office of Historic Resources, SurveyLA, Wilshire Community Plan Area, website: http://preservation.lacity.org/sites/default/files/Wilshire%20CPA%20Individual%20Resources_2.pdf, accessed May 2019.*

[46] *As noted in Table 3.1 on page 17, the property identified as "3820 Oakwood Avenue" in the Historic Resources Survey is the same property as 3838 Oakwood Avenue. Both addresses are identified as APN 5501-001-025.*

In 1971, the building's current occupants engineering firm Mackintosh & Mackintosh, Inc. relocated to the building. Archival research did not reveal that this connection between the engineering firm and the subject property had direct associations with events that have made a significant contribution to the history of the nation, state, or city. Therefore, the 3820 Oakwood does not appear eligible under NRHP/CRHR Criterion A/1.

Criterion B/2: Are associated with the lives of persons significant in our past.

To be found eligible under B/2, 3820 Oakwood Avenue must be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research did not indicate that any previous property owner, including the owners of Stanley Construction Company and Mackintosh & Mackintosh, Inc., or any individual who worked for a business previously located at the 3820 Oakwood Avenue was known to be historically significant figures at the national, state, or local level. Despite the building's association with its longest occupant Mackintosh & Mackintosh, Inc., who is credited for having brought quality standards for concrete block masonry construction, the firm's largest accomplishments –forming the Concrete Masonry Association and publishing a masonry standards manual—occurred before they relocated to the subject property in 1971. As such, 3820 Oakwood Avenue does not appear to be associated with any individual's important historic work and, therefore, does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that the Stanley Construction Company built the subject property in 1963, designed by the architecture firm Robert H. Peterson & Associates. The 3820 Oakwood Avenue displays some of the characteristics of the Mid-Century Modern architectural style; however, it is an unremarkable example. 3820 Oakwood Avenue contains only basic character defining features of the style and, in comparison to other Mid-Century Modern buildings found both locally and regionally, it appears to be less than distinguishable. In addition, Mackintosh & Mackintosh, Inc. made several alterations to the building including adding a second floor to the previously open-air entry stoop that compromised the integrity of the original design. For these reasons, 3820 Oakwood Avenue does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

The 3820 Oakwood Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

Summary of Evaluation Findings (3820 Oakwood Avenue)

In conclusion, 3820 Oakwood Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack integrity necessary to convey its historical associations or architectural significance. This resource has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, 3820 Oakwood Avenue does not appear to be a historical resource for the purposes of CEQA.

3812 Oakwood Avenue:

Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

The buildings at 3812 Oakwood Avenue were developed between 1924 and 1934 as rentable, single-family dwellings, with proprietor on site. Two buildings were Pacific Ready-Cut homes, however are not part of typical residential development patterns of single-building properties or bungalow courts. Within the SurveyLA Wilshire Community Plan Area-identified contexts of streetcar suburbanization 1888-1933 on account of being on the Temple Street Cable Railroad line (along Beverly Boulevard) and the Cahuenga Valley Line (Beverly Boulevard and Western Avenue), the buildings could be considered part of the housing boom culminating in the 1920s, specifically afforded by being on or adjacent to a streetcar or railroad line.

However, even though the buildings at 3812 Oakwood Avenue represent this theme, subsequent alteration, including the addition of a garage in 1934 and changing all the buildings from single-family residences to storage in the 1960s has removed all association with this theme. These alterations and changes from the historical use have resulted in the buildings not retaining any association with their original owner, their original rentable single-family home use, or their streetcar suburb origins. Due to alteration issues and a lack of integrity of association with events important to history, 3812 Oakwood Avenue does not appear eligible under NRHP Criterion A or CRHR Criteria 1.

Criterion B/2: Are associated with the lives of persons significant in our past.

To be found eligible under B/2 the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research did not indicate that Mrs. Hannah Olincy, or any subsequent property owners or individuals who have worked at the 3812 Oakwood Avenue are known to be historically significant figures at the national, state, or local level. As such, 3812 Oakwood Avenue does not appear to be associated with any individual's important historic work, and therefore does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that two of the buildings at 3812 Oakwood Avenue are Pacific Ready-Cut Homes, purchased and built in 1924, built in a simplified Craftsman style. Major alterations to the buildings, including the addition of a fourth 2-story garage and residence and the demolition of the third Pacific Ready-Cut Home building have diminished association both with this home's manufacturer and with the architectural style. Alterations include new windows and doors, interior alteration to the Pacific Ready-Cut interior plans, and the addition of solar panels on the roof – all of which diminish integrity of material and workmanship, which are critical to eligibility under NRHP and CRHR Criterion C/3. The building does not possess high artistic values or represent a significant and distinguishable entity whose components may lack individual distinction. For these reasons, 3812 Oakwood Avenue does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

3812 Oakwood Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

Summary of Evaluation Findings (3812 Oakwood Avenue)

In conclusion, 3812 Oakwood Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack integrity necessary to convey its historical associations or architectural significance. The property also does appear eligible

as a contributor to an historic district. This resource has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, 3812 Oakwood Avenue does not appear to be a historical resource for the purposes of CEQA.

316 Juanita Avenue

Criterion A/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

Research indicates that 316 Juanita Avenue was established in 1959 as a Pacific Telephone & Telegraph operation center. The existing SurveyLA historic context statement for Telephone History and Development indicates that the construction date places the property within "The Era of Technological Innovation, 1945-1974" which spans from the end of WWII to 1974, when the AT&T telecom monopoly was forced to break up. According to this context, telephone industry related buildings may be eligible under Criterion A or C in the areas of Communications, Community Planning and Development or Architecture.

316 Juanita Avenue appears utilitarian in nature and is not known as a site where technological innovations were pioneered, utilized, or advanced. Therefore, 316 Juanita Avenue cannot be considered significant under the Communications Area of Significance.

For the Community Planning and Development Area of Significance, resources must "show how a key urban service grew to provide for the needs of residents in new districts, and constructed facilities in those districts that served as landmarks due to their size and placement in highly visible locations." However, 316 Juanita Avenue did not bring new service to the Dayton Heights neighborhood, as one had already been established in 1924 at 1251-1255 N. Vermont Avenue, Hollywood just one mile to the north. It was also not a large facility nor on a major right-of-way and may not be considered a landmark due to size or prominent location. Therefore, 316 Juanita Avenue cannot be considered significant under the Community Planning and Development Area of Significance.

Outside of the Telephone History and Development historic context for Los Angeles, the 316 Juanita Avenue is not individually related to events which have made a significant contribution to the broad patterns of history. Due to a lack of significant associations with events important to history, 316 Juanita Avenue does not appear eligible under NRHP Criterion A or CRHR Criteria 1.

Criterion B/2: Are associated with the lives of persons significant in our past.

Archival research did not indicate that any previous property owners or individuals who have worked at 316 Juanita Avenue were known to be historically significant figures at

the national, state, or local level. As such, this property is not known to have any historical associations with people important to the nation's or state's past. Furthermore, to be found eligible under B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. 316 Juanita Avenue does not appear to be associated with any individual's important historic work, and therefore, does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

Criterion C/3: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Research indicates that 316 Juanita Avenue was established in 1959 and designed by Robert H. Peterson & Associates in a restrained Mid-Century Modern style for the operation center, and utilitarian style for the remaining buildings. The existing SurveyLA historic context statement for Telephone History and Development indicates that the construction date places the property within "The Era of Technological Innovation, 1945-1974" which spans from the end of WWII to 1974, when the AT&T telecom monopoly was forced to break up. According to this context, telephone industry related buildings may be eligible under wither Criterion A or C in the areas of Communications, Community Planning and Development, or Architecture.

Though 316 Juanita's operation center building was built in the typical commercial architectural pattern of the period (1959, Mid-Century Modern), it does not employ the distinctive characteristics of the Mid-Century Modern style. The building has been highly altered by subsequent infill and window coverings, which diminish the integrity of the operation center. The auto garage, storage building, and equipment storage are utilitarian buildings that do not embody a specific architectural style or method of construction. The buildings do not possess high artistic values or represent a significant and distinguishable entity whose components may lack individual distinction. For these reasons, none of the buildings at 316 Juanita Avenue appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history.

316 Juanita Avenue is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials or technologies.

Summary of Evaluation Findings (316 Juanita Avenue)

In conclusion, 316 Juanita Avenue does not appear eligible for listing in the NRHP, CRHR, or City of Los Angeles HCM due to a lack of important historical associations and architectural significance, nor does it appear eligible as a contributor to an historic district. This property has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). As such, the buildings located at 316 Juanita Avenue do not appear to be a historical resources for the purposes of CEQA.

Summary of Evaluation Findings (All Sites)

There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have a less than significant impact on the historic and potentially historic resources near the Project Site, as the Proposed Project does not directly abut any historic resources and would not result in a substantial adverse change to the immediate surroundings of any historical resource to the degree it would no longer be eligible for listing under national, state, or local landmark designation programs. No mitigation is required or recommended. Therefore, the development of the Proposed Project would have a less than significant impact to surrounding historical resources.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources, which presently exist within the Project Site. The Project Site has been previously developed and graded. The Project Site and immediate surrounding areas do not contain any known archaeological resources.[47] For purposes of assessing the project's potential impacts upon archaeological resources, the following analysis summarizes the findings of the Archaeological and Paleontological Resources Assessment for the Enlightenment Plaza / Juanita Avenue Project, Los Angeles, California ("Archaeological and Paleontological Resource Assessment"), prepared by Dudek dated April 22, 2020. (See Appendix B.2 to this SCEA).

[47] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric & Historical Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

SCCIC Records Search

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) on April 8, 2019 for the Project Site and surrounding 0.5-mile search buffer. This search included collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Project Site, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

Results of the cultural resources records search indicated that 22 previous cultural resource investigations have been conducted within the records search area between 1987 and 2014. Two of these studies identified overlap the Project Site and neither study identified archaeological resources within 0.5-mile of the Study Area.

Sixteen (16) previously recorded cultural resources have been documented within a 0.5-mile of the Project Site. None of these intersect the Project Site and all 16 resources are historic-era buildings or structures. Furthermore, as discussed in Section 6.18 Tribal Cultural Resources, below, no cultural resources of Native American origin are documented within the Project Site or surrounding 0.5-mile search area of files held at the SCCIC.

NAHC Sacred Lands File Search

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on April 4, 2019. The NAHC emailed a response on April 25, 2019, which indicated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. Documents related to the NAHC SLF search are included in Appendix H of the Archaeological Resource Assessment. See Section 6.18 regarding Tribal Cultural Resources.

Archival Research

Dudek consulted historic maps and aerial photographs to understand development of the Project Site and surrounding properties. The first USGS topographic map showing the Project Site dates to 1894 and shows that there was at least one structure within the Study Area and a few other structures in the general vicinity. The review of the historic

aerials and topographic maps indicates that of the seven structures existing within the Project Site, the three extant residential structures at 3812 Oakwood Avenue in APN 5501-001-023, were constructed by at least 1941. At 316 Juanita Avenue, within APN 5501-001-800, there are currently three structures. The rectangle structure along the western boundary, was built between 1956 and 1960. The smaller rectangle structure in the center of APN 5501-001-800, directly east of the building developed between 1956 and 1960, was built after 1972. Prior to this time, the center of APN 5501-001-800 was paved or undeveloped. The small shed -like structure in the northeastern more corner of APN 5501-001-800 was built between 1980 and 1989. The seventh building within the proposed Project Site, located at 3820 Oakwood Avenue, within APN 5501-001-025, was built between 1962 and 1965.

Within the Study Area, the large structure currently associated with the MX Collision Center, within APN 5501-001-026, was built between 1965 and 1972. The rectangular structure currently associated with Dewey Pest Control within APN 5501-001-027, was initially developed between 1927 and 1941, and was later renovated between 1956 and 1960. The Quonset Hut currently associated with Dewey Pest Control, within 5501-001-028, was built between 1948 and 1952. Finally, the building currently associated with Midway Car Rental Hollywood, within APN 5501-001-019, was built between 1956 and 1960. No cultural resources were identified within, or in the vicinity of, the Project Site through a CHRIS records search, SLF search, or archival research. Therefore, compliance with the provisions of 14 CCR 15064.5(f) would ensure that the environmental impacts associated with the inadvertent discovery of significant archaeological resources would be reduced to a less than significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Code, § 5097.98, and Health and Safety Code § 7050.5(b))?

Less Than Significant Impact. A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains. Based on the findings of the Archaeological Resource Assessment (see Appendix B of this SCEA), there is no evidence that the Project Site has been used or historically associated with any human internment sites. As such, the likelihood of encountering human remains during construction is low. Pursuant to Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery and no further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the Coroner determines that the remains are, or are believed to be, Native American, he or

she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with regulatory compliance measures would ensure that if any such remains are found during construction of the Proposed Project, they would be handled according to the proper regulations, and impacts to human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with standard regulatory measures. Therefore, the Proposed Project's incremental contribution to impacts upon archaeological resources would not be considerable, and cumulative impacts to cultural resources would be less than significant.

6.6 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?	☐	☐	☒	☐

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?**

Less Than Significant Impact (responses a and b). Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal: (1) Decreasing overall per capita energy consumption, (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) Increasing reliance on renewable energy sources.

The determination of whether a project results in a significant impact on energy conservation shall be made considering the following factors: a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; b) whether and when the needed infrastructure was anticipated by adopted plans; and c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

The Proposed Project would develop five eight-story multi-family residential buildings on an infill site, which would contribute to the revitalization of the Wilshire Community Plan Area. As a residential project, the Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Code of Regulations. California's Energy Efficiency Standards for Residential and Nonresidential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically (approximately three-year cycle) to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.[48] The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California

[48] *California Energy Commission, 2016 Building Energy Efficiency Standards, website: http://www.energy.ca.gov/title24/2016standards/, accessed May 2019.*

energy policy that energy efficiency is the resource of first choice for meeting California's energy needs.

The L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Proposed Project includes energy efficiency components to conserve energy, which are discussed below.

Existing Infrastructure

The Project Site is located in a highly urbanized area in the Wilshire area. The surrounding area is served by overhead electrical systems. The Proposed Project would require on-site transformation and may require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the Proposed Project's immediate vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

Energy Consumption

Construction

Energy would be consumed during construction of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of 3,040 cy of soil, 845 cy of asphalt, and 9,399 square feet of building debris from the Project Site during the demolition/site clearing phase. The demolition phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the demolition, site clearing, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process. Construction equipment and activities do not generally involve the use of natural gas.

In order to quantify the amount of diesel and gasoline fuel utilized for the Proposed Project's construction, the equipment usage, horsepower, load factors, and fuel rates from construction activities calculated in the CalEEMod program for the Proposed Project

were utilized to estimate the gallons of diesel and gasoline consumed (Appendix C, Energy Demand Calculation Worksheets). Table 6.5 below, shows the estimated electricity and transportation energy consumed during the construction.

Table 6.5
Estimated Energy Usage During Project Construction

Fuel Type	Quantity
Electricity [a,b]	
Water Use	**3,878 kWh**
Gasoline	
On-Road Vehicles (Workers Trips)	**1,071,661 gallons**
Diesel	
On Road Construction Equipment (Vendors/Deliveries)	80,391 gallons
On Road Construction Equipment (Haul Trips)	2,267 gallons
Off-Road Construction Equipment	20,083 gallons
Subtotal Diesel	**102,741 gallons**

Notes:
[a] *Water Application Rate = 3,020 gal/acre/day per Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition).*
[b] *Electricity consumption per water usage = 0.009727 kWh/gallon.*
Source: Parker Environmental Consultants, 2019; Calculations provided in Appendix C, Energy Demand Calculation Worksheets, to this SCEA.

As shown, the Proposed Project would consume approximately 3,878 kWh of electricity, and 1,174,402 gallons of transportation fuel, including 102,741 gallons of diesel and 1,071,661 gallons of gasoline.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. The Proposed Project will also comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel fueled commercial vehicles be limited to five minutes at any location. Accordingly, energy demands during construction would be less than significant.

Operation

Electricity

As shown in Table 6.6, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,597,932 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Proposed Project would also be required to comply with the L.A. Green Building Code, which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. Therefore, compliance with Title 24 of the California Code of Regulations and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been considered in the planned growth of the City's power system.

Table 6.6
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Total Electricity Demand (kWh/year) [a]
Existing Uses		
Light Manufacturing	7,810 sf	86,691
Single Family Residential	3 DU	23,927
Total Existing Electricity Demand:		**110,618**
Proposed Uses		
Multi-Family Residential	454 du	1,708,550
Total Proposed Project Electricity Demand:		**1,708,550**
Existing Electricity Demand (to be demolished):		*-110,618*
NET TOTAL Electricity Demand:		**1,597,932**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix E, GHG Worksheets to this SCEA.*
Source: Parker Environmental Consultants, 2019.

The Proposed Project would include energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY STAR-rated appliances for residential dwelling units, low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, energy demands during operation would be less than significant.

Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company (SCG). Gas supply available to SCG from California sources averaged 51 million cf/day in 2018. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG's estimated physical capacity of upstream pipelines. SCG's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cf. However, due to the current inventory restrictions imposed at the Aliso Canyon site, working inventory for SoCalGas is reduced. The California Public Utilities Commission (PUC), in June 2018, proposed that a maximum inventory of 34 billion cubic feet be authorized for maximum inventory.[49]

SCG projects total natural gas demand to decrease at an annual rate of 0.5 percent per year from 2018 to 2035. This decrease is due to more efficient power plants, pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG's projection for natural gas also decreases.

As shown in Table 6.7, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 307,191 cf per month, would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 34 billion cf as of 2018.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy beyond those required by Title 24 of the California Code of Regulations. Thus, natural gas demands during operation would be less than significant.

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

Table 6.7
Estimated Natural Gas Consumption by the Proposed Project

Land Use	Size	Total Natural Gas Demand (kBTU/yr) [a]	Total Natural Gas Demand (cf/month) [b]
Existing Uses			
Light Manufacturing	7,810 sf	141,361	11,544
Single Family Residential	3 DU	82,489	6,737
Total Existing Natural Gas Demand:		**223,850**	18,281
Proposed Project			
Multi-Family Residential	454 du	3,985,370	325,472
Total Proposed Project Natural Gas Demand:		**3,985,370**	**325,472**
Less Existing Natural Gas Demand:		*-223,850*	*-18,281*
NET TOTAL Natural Gas Demand:		**3,761,520**	**307,191**

Notes: sf =square feet; du = dwelling unit
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix E, Greenhouse Gas Worksheets.*
[b] *1kBTU is equivalent to 0.98 cubic feet of natural gas.*
Source: Parker Environmental Consultants, 2019.

Fossil Fuels

The Proposed Project would generate a demand on fossil fuels as a result of the vehicle trips traveling to and from the Project Site. As discussed in Section 6.17 (Transportation/Traffic) the estimated daily trips associated with the Proposed Project would be approximately 407 net trips. Table 6.8, below, shows the estimated amount of gasoline demand from vehicles traveling to and from the Proposed Project. Assuming an average fuel efficiency of 28.35 mpg for gasoline and 6.27 mpg for diesel, it is estimated that the operation of the Proposed Project would generate an increased net annual demand for approximately 11,971 gallons of diesel and 41,476 gallons of gasoline per year over existing conditions.[50]

However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas, and oil. The Project Site is located in the Wilshire area, which is highly connected to the regional transit network in the Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and

[50] *Fuel rates are based on per Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008).*

Table 6.8
Proposed Project's Estimated Transportation Energy Consumption

	Annual VMTs (miles) [a]	Fuel Rate (mpg) [b]	Total Fuel Demand (gallons/year)
Diesel			
Existing (to be demolished)	43,162.44	6.27	***(6,884)***
Proposed Project	118,215.66	6.27	**18,855**
		Net Diesel Consumption:	**11,971**
Gasoline			
Existing (to be demolished)	676,211.56	28.35	***(23,852)***
Proposed Project	1,852,045.34	28.35	**65,328**
		Net Gasoline Consumption:	***41,476***

Notes: VMTs = vehicle miles traveled; mpg = miles per gallon

[a] *Appendix E, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.*

[b] *Source: Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008)*

Parker Environmental Consultants, 2019. (See Appendix C, Energy Demand Calculation Worksheets)

entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including nearby railway, are also present. The Proposed Project is within 500 feet of the Vermont/Beverly Rail Station. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express. Specifically, a total of 5 bus lines serve the Project Site, including Metro Local Lines 14/37, 201, 204, Rapid Line 754, and the Metro Rail Red Line).The LADOT DASH Line (DASH Wilshire Center/Koreatown) runs along Vermont Avenue, with the nearest bus stop located at W. 1st Street. Additionally, while some bus lines and/or other transit services in the general Project vicinity are considered to be too distant from the Project Site (generally, more than one-quarter mile) to be used directly, these services can be accessed via connections to or transfers from these site-serving lines to provide access for the Proposed Project's residents, visitors, and employees between the Project Site and the larger regional area. Due to its proximity to the rail and bus lines aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian-friendly street edges along Juanita and Madison Avenues. The sidewalk on Madison Avenue adjacent to the Proposed Project will be widened up to 12 feet wide in most locations. On Juanita Avenue existing 12 foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood and Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita and Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Proposed Project becoming more pedestrian and bicycle oriented.

The Project Site's location in a transit-oriented district and its provision of bicycle parking and streetscape amenities, including pedestrian-scaled landscaping and street furniture, would therefore decrease the Proposed Project's reliance on fossil fuels.

Renewable Energy

The LADWP's 2016 Power Integrated Resource Plan (IRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost-effective manner. The 2016 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2016 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives:

- Eliminate Coal from LADWP's Power Supply by replacing IPP by 2025;
- Reach 33 percent renewable portfolio standard (RPS) by 2020, 50 percent by 2025, 55 percent RPS by 2030, and 65 percent RPS by 2036, including a goal of 900 MW Local Solar by 2025 and 1,500 MW Local Solar by 2035;
- Implement 404 MW of Energy Storage by 2025;
- Achieve 15 percent energy efficiency by 2020;
- Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029;
- Invest in the Power System Reliability Program; and

- Promote a high scenario of Transportation Electrification.

As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands would primarily be derived from renewable energy sources. On a project specific level, the Proposed Project includes the following features which, would further reduce energy demands:

Proximity to Mass Transit: The Project Site is an Infill Site within a Transit Priority Area as defined by CEQA. The Project Site is located approximately 500 feet from the Vermont/Beverly Rail Station and within approximately one-quarter mile of numerous bus routes with peak commute service intervals of 15 minutes or less and an existing transit stop.

1. *In-Fill Site*: The Proposed Project is located on an existing Infill Site that is currently developed with three commercial buildings used for the commercial operation of a telecommunications company, three single-family residential buildings, and one surface parking lot. The Project Site is located in a highly developed area of the Wilshire Community, which is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

2. *Trip Reduction*: In addition to its location in a Transit Priority Area, the Proposed Project would provide 225 on-site bicycle parking spaces pursuant to the requirements of the SNAP including 12 rack along the perimeter of the Project Site. The Proposed Project also provides various streetscape improvements discussed above.

3. *Resource Conservation*: As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

Therefore, with incorporation of the features identified above, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Proposed Project construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Energy impacts would therefore be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase demand for electricity, natural, and fossil fuels but the Proposed Project's contribution would not be cumulatively considerable.

Electricity

The Proposed Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Code of Regulations and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

Natural Gas

Development of the Proposed Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, the Proposed Project would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 34 billion cf as of 2018. As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Code of Regulations would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SCG's

ability to serve each related project. As such, it is anticipated the related projects and the Proposed Project would be accommodated by SCG. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Fossil Fuels

The Proposed Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within a Transit Priority Area, which is an area within ½ mile of a Major Transit Stop. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. As such, the Proposed Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.

6.7 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following section summarizes and incorporates by reference information from the following report:

- Geotechnical Engineering Investigation, Proposed Apartment Development, 312 through 328 North Juanita Avenue and 317 through 345 North Madison Avenue, Los Angeles, California, prepared by Geotechnologies, Inc., dated May 22, 2019 ("Geotechnical Investigation"). The Geotechnical Investigation is included as Appendix D to this SCEA.

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

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

Less Than Significant Impact. A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called

California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures. Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially active” faults utilizing the same aging criteria as that used by the CGS, described above. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years.

The Geotechnical Investigation concluded that no known active faults or potentially active faults underlie the Project Site. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the potential for surface ground rupture due to faulting occurring beneath the Project Site during the design life of the proposed structure is considered low.

In addition, the Proposed Project would be required to comply with the 2019 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake, which contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

According to ZIMAS, the Project Site is located approximately one mile from a known active fault, which is the Puente Hills Blind Thrust Fault. Thus, the Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project provided that the

recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that the Proposed Project meets the applicable performance measures. Accordingly, with the design and construction of the Proposed Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, Proposed Project's impacts associated with seismic hazards would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and was concluded to have a low potential for surface rupture beneath the Project Site. However, the nearest earthquake fault, the Puente Hills Blind Thrust Fault, is located approximately one mile from the Project Site. Therefore, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Geotechnical Investigation concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and implemented during design and construction. Additionally, the Proposed Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter would be implemented for the Proposed Project, construction and operation of the

Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. As such, the Proposed Project's impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A project would have a significant impact related to geology and soils if it exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

According to the City of Los Angeles Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, based on the Geotechnical Investigation, the Seismic Hazards Maps for the State of California (CDMG, 1999) does not classify the Project Site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. Groundwater was encountered during exploration in three of the five exploratory borings, conducted to a maximum depth of 50 feet below the existing grade. Water seepage was observed to depths ranging between 11.5 and 12.5 feet below the existing grade. The characteristics of the water seepage likely represents a perched water table condition where differences in permeability within earth material allows a finite amount of water to develop above an impermeable zone. The Geotechnical Investigation concluded that the encountered seepage does not represent the static groundwater level.

The historically highest groundwater level for the Project Site is not well defined for the project site. The closest contour is almost a mile to the northwest and corresponds to a

depth of 20 feet below grade. Based on the density of the older alluvium and bedrock, the Project Site is not susceptible to liquefaction. The Proposed Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. Therefore, compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.

iv) Landslides?

No Impact. A project would have a significant impact related to geology and soils if the Proposed Project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is not located within a City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for slope instability according to the City of Los Angeles Safety Element. Furthermore, the Project Site and surrounding area not within an area identified as having a potential for seismic slope instability as designated by the "State of California Seismic Hazard Zones" map. The Geotechnical Investigation states that the probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the gentle topographic relief observed across or adjacent to the Project Site. The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, and no impact would occur.

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Although development of the Proposed Project has the potential to result in the erosion of soils during grading, excavation, and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation,

and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The application of Best Management Practices ("BMPs") includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with regulatory measures will ensure a less than significant impact would occur with respect to erosion or loss of topsoil during construction.

Furthermore, the Geotechnical Investigation provided recommendations regarding foundations and temporary grading during construction of the Proposed Project. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. Compliance with the standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, will further ensure that impacts to soil erosion or the loss of topsoil are reduced to less than significant levels.

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

Less Than Significant Impact. A project would have a significant impact related to geology and soils if it is located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by a project's exacerbation of existing environmental conditions.

For the purpose of this specific issue, a significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the Project Site is not susceptible to liquefaction. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site is also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the gentle topographic relief observed across or adjacent to the Project Site. Based upon the exploration, laboratory testing, and research, the Geotechnical Investigation concluded that construction of the Proposed Project is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Investigation are followed and implemented during construction. With the implementation of the recommendations contained within the Geotechnical Investigation and the Building Code requirements as discussed above in Section 6.7 (a), the potential for geologic hazards would be reduced to a less than significant level.

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

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

As discussed in the Geotechnical Investigation, subsurface exploration involved drilling five borings to a maximum depth of approximately 50 feet below the existing grade. An expansion index test was performed for the on-site soils and was found to range between the low and moderate expansion range (between 3 and 89). The Proposed Project would incorporate the recommended reinforcing noting in the “Slabs on Grade” section of the Geotechnical Investigation. With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the Building Code requirements, impacts related to expansive soil would be less than significant.

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

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously developed and graded. The Project Site and immediate surrounding areas do not contain any unique geologic features or known vertebrate paleontological resources.[51] This is further supported by correspondence received from the Natural History Museum of Los Angeles County (NHMLA) dated April 18, 2019, which states that no vertebrate fossil localities lie within the project site boundaries; however, they do have localities within the one-half mile buffer and outside the buffer but nearby from the same sedimentary deposits that occur subsurface. Below the surficial Quaternary alluvium, which is generally too young to preserve fossils, there are likely Pleistocene or Ice Age older Quaternary deposits and/or late Miocene shale deposits that have the potential to produce significant fossils. The closest vertebrate fossil locality from older Quaternary deposits, NHMLA 3250, produced a fossil mammoth (*mammuthus*) less than one-half kilometer north of the Proposed Project near the intersection of Madison Avenue and Middlebury Street from approximately eight feet below the street surface. NHMLA reported a fossil mastodon (*mammutidae*) from approximately five to six feet below the ground surface near the intersection of Western Avenue and Council Street, southwest of the Project Site.

NHMLA recommends paleontological monitoring below the upper few feet of alluvium and collection of sediment samples to determine micro-vertebrate fossil productivity.

However, consistent with the standard conditions of approval applied to development projects, if paleontological resources are discovered during excavation, grading, or

[51] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines. With adherence to the standard conditions and regulatory compliance measures, any impacts to paleontological resources would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of standard conditions and regulatory compliance measures and recommendations in the Geotechnical Investigation, Project impacts would be reduced to less than significant levels. Furthermore, with respect to paleontological resources, the regulatory compliance measure detailed above, would ensure Project impacts to paleontological resources are less than significant level. Because the discovery of paleontological resources would be geographically limited to the immediate area of the find, the potential for cumulative impacts to occur with respect to paleontological resources would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

6.8 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?	☐	☐	☒	☐

GHG and Global Climate Change Background

Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California.

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

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

Regulatory Environment

Executive Order S-3-05

Executive Order S-3-05, issued in June 2005 by Governor Arnold Schwarzenegger (Governor Schwarzenegger), established GHG emissions targets for the State, as well as a process to ensure the targets are met. The order directed the California Environmental Protection Agency (CalEPA) to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. The Statewide GHG targets established by Executive Order S-3-05 are as follows:

- By 2010, reduce statewide emissions to 2000 emission levels;
- By 2020, reduce statewide emissions to 1990 emission levels;
- By 2050, reduce statewide emissions to 80 percent below 1990 levels.

Executive Order B-30-15

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions to 40 percent below 1990 emission levels by the year 2030.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 32 (Statewide GHG Reductions)

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

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to

reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[52] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[53] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's

[52] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

[53] *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential and commercial uses and does not propose any industrial or high-emitting land uses. On July 2018, CARB recently announced that greenhouse gas pollution in California fell below

1990 levels, which was the 2020 greenhouse gas emissions goal passed by AB 32.[54]

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

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

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

Low Carbon Fuel Standard

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

Sustainable Communities and Climate Protection Act (SB 375)

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

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach

[54] *California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed August 2018.*

passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

2016-2040 RTP/SCS

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016-2040 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed

CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

Local Policies and Regulations

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

City of Los Angeles Sustainable City pLAn

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles' first ever Sustainable City pLAn (The pLAn). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short-term (by 2017) and long-term (2025 and 2035) targets. The pLAn set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and greenhouse gas accounting. L.A. has already reduced its greenhouse gas emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

Since 2015, Mayor Garcetti has released an expanded vision for the Sustainable City pLAn, called L.A.'s Green New Deal. Released in 2019, the update to the Sustainable City pLAn sets new energy efficiency and sustainability goals that will transition the City of Los Angeles to a more resilient, sustainable, and equitable energy future. That future will be realized, in part, by the 2050 targets that are spelled out in the plan that include goals for: renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, environmental justice, prosperity and green jobs, and lead by example. Further discussion of the L.A. Green New Deal, as well as consistency analysis with the applicable targets of the plan, can be found in the Land Use Section.

L.A. Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New development projects are required to comply with the *L.A. Green Building Code,* and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including SB 32.

GHG Significance Threshold

The SCAQMD, the State CEQA Guidelines, and the City do not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a residential project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Proposed Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions.

For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016-2040 RTP/SCS, and the LA Green Building Code.

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

Less Than Significant Impact.

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (Version 2016.3.2) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 6.9, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 6.9, the total GHG emissions from the Proposed Project's construction activities would be 1,348 tons with the greatest annual emissions occurring in 2022. As recommended by the SCAQMD, the total GHG construction emissions are amortized over the projected 30-year lifetime of the Proposed Project to be factored into the Proposed Project's operational emissions in order to determine the Proposed Project's annual GHG emissions inventory.

Table 6.9
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2021	459
2022	791
2023	98
Total Construction GHG Emissions	**1,348**
Amortized Annual Emissions [b]	***44.93***

[a] Construction CO_2 values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix E, Greenhouse Gas Emissions Worksheets.
[b] Consistent with SCAQMD recommended methodology for addressing construction emissions, the total construction emissions were amortized over a 30-year projected lifetime.

Baseline Operational GHG Emissions

The Project Site is developed with three commercial buildings, three single-family residential buildings, and one surface parking lot, which serves as the existing conditions baseline. Additionally, the Project Site includes a 5,663 square-foot two-story office building above a one-level partially subterranean garage at 3838 Oakwood Avenue.[55] The operations of the on-site commercial and residential uses generate GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 6.10 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing commercial and residential buildings at the Project Site. As shown in Table 6.10, Existing Project Site Greenhouse Gas Emissions, the existing operations on the Project Site generate approximately 424.09 CO^2e MTY.

[55] *The existing office building at 3838 Oakwood Avenue was not included within the Existing GHG Operations emissions in Table 6.2 as it is not a part of the development site and no changes are proposed to the current land use or occupied floor area.*

Table 6.10
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	0.05
Energy	73.75
Mobile	325.54
Waste	6.72
Water	18.03
Total	**424.09**
Calculation data and results provided in Greenhouse Gas Emissions Calculations Worksheets. (See Appendix E to this SCEA)	

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated using the CARB approved CalEEMod emissions model. As shown in Table 6.11, below, the gross increase in GHG emissions generated by the Proposed Project is approximately 2,370.95 CO2e MTY. The Proposed Project's net GHG emissions after accounting for the displacement of existing land uses on an infill lot would result in a net increase of 1,946.95 CO2e MTY. As stated above, there are no adopted quantitative thresholds of significance for GHG impacts for residential projects. However, it should be noted that the Proposed Project's GHG emissions are below the SCAQMD's previously proposed interim CEQA GHG significance thresholds for commercial/residential projects, which was 3,000 metric tons of CO2e per year.

For purposes of disclosing the Proposed Project's GHG reduction measures and design features, the Proposed Project's structural and operational features would include installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Proposed Project. When considering the fact that the Project is a dense residential infill development in a transit- rich area, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB 375, and SCAG's 2016 RTP/SCS growth strategy), the Proposed Project would realize an approximate 26% reduction in GHG emissions as compared to a project of the same size that is not located on an infill lot and that does not meet the energy conservation standards of the L.A. Green Building

Table 6.11
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
	Proposed Project
Area	7.83
Energy	1,167.48
Mobile (Motor Vehicles)	809.44
Stationary	18.34
Waste	26.26
Water	296.67
Construction Emissions [c]	44.93
Proposed Project Total:	**2,370.95**
Less Existing Project Site:	*424.09*
Proposed Project Net Total:	**1,946.86**
SCAQMD's Interim Threshold of	**3,000**
Significant Impact? [Yes/No]	**No**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project as per SCAQMD guidance.*
[b] *As stated above, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.*
Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Worksheets.

Code.[56] The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project's infill and smart growth attributes (i.e., replacement of existing uses and location of high density housing and neighborhood serving retail uses in a high quality transit area) and its compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Consistency with SB 375 and SB 32

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required

[56] *This estimate is based on comparing the Proposed Project's with mitigation scenario in the CalEEMod Worksheets to the pre-mitigation scenario. The mitigation scenario accounts for certain measures that are required by existing regulations such as SCAQMD Rule 403 for fugitive dust suppression, and various energy and water conservation features mandated by the Los Angeles Green Building Code (i.e., going beyond Title 24 energy conservation measures, installing water conservation plumbing fixtures, and instituting on-site recycling and citywide solid waste reduction programs.)*

to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS and Scoping Plan is provided further below in Table 6.12, Consistency with Applicable SB 32 Scoping Plan Measures.

Table 6.12
Consistency with Applicable SB 32 Scoping Plan Measures

Scoping Plan Measures	Consistency
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The Proposed Project would be consistent with the Scoping Plan's policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY Star-rated appliances.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent**. The Proposed Project would not impede the Scoping Plan's policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy that exceed 33 percent.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent**. The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY STAR-rated appliances.
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.	**Consistent**. The Proposed Project is consistent with the Scoping Plan's policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity. (See response to Section 6.19(d), below). It would meet the City's 70 percent waste diversion rate goal and comply with the City's Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.

***Water*.** Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Proposed Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use. As part of its application for a water supply assessment (WSA) from the LADWP, the Applicant has committed to implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project: ○ High Efficiency Toilets with flush volume of 1.0 gallons of water per flush ○ Energy Star Certified Clothes Washers (Residential) – water factor of 3.2 and capacity of 4.5 cu-ft, front loading ○ Showerheads with flow rate of 1.5 gallons per minute or less ○ Drought Tolerant Plants – 70% of total landscaping ○ Domestic Water Heating System located close proximity to point(s) of use ○ Individual Metering and billing for water use for every residential dwelling unit and commercial unit ○ Drip/Subsurface Irrigation (Micro-Irrigation) ○ Proper Hydro-zoning (groups plants with similar water requirements together) Zoned Irrigation The Applicant has also committed to comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181,899 and No.183,833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Proposed Project as feasible, pending final determination.
Measures not listed are not applicable to this Project. *Source: Parker Environmental Consultants, 2019.*	

Consistency with 2016 RTP/SCS

The Proposed Project is 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:

- Provide compact growth in areas accessible to transit;
- Provide jobs and housing closer to transit;
- Focus new housing and job growth in High Quality Transit Areas (HQTA); and
- Provide biking and walking infrastructure to improve active transportation options, transit access.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a HQTA. The 2016-2040 RTP/SCS defines a HQTA as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency

during peak commute hours. Based on a walkability assessment of the project area by WalkScore.com, the Project Site is rated with a score of 83 of 100 possible points and defined as “very walkable – most errands can be accomplished on foot.” In addition, the Proposed Project will provide bicycle storage areas for Project residents and guests. Walkscore.com also allocates a transit score of 67 to the Project Site, described as “good transit – many nearby public transportation options,” and a bike score of 61 to the Project Site, described as “bikeable.” The Proposed Project will provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG’s 2016 RTP/SCS.

See also Section 6.2 of this SCEA for a comprehensive analysis of the Proposed Project’s consistency with SCAG’s 2016 RTP/SCS.

Consistency with L.A. Green Building Code

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission (CEC), meet 50 percent construction waste recycling levels, provide on-site storage for short- and long-term bicycle parking areas, and provide Energy-Star rated appliances were applicable. The Proposed Project will comply with these mandatory measures and, therefore, be consistent with the L.A. Green Building Code.

As demonstrated above, the Proposed Project’s design features and compliance with regulatory measures are consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB’s 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project’s generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project’s impact would be less than significant.

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 impact occurs where the Proposed Project conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing

the emissions of GHGs. As discussed in detail above, the Proposed Project is consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

Cumulative Impacts

Less Than Significant Impact. An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Proposed Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in GHG emissions. The Proposed Project's GHG and the resulting level of significance are appropriately assessed in terms of the cumulative impact on global GHG emissions on climate change. Accordingly, a quantitative analysis of the GHG emissions anticipated to result from construction and operational activities was calculated as part of the cumulative impact analysis. As part of that analysis, the Proposed Project's GHG emissions were analyzed on a project-specific basis with respect to its impacts on global climate change.

As shown in the analysis above, the Proposed Project is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32, SB 375, the 2016-2040 RTP/SCS, and the LA Green Building Code that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

6.9 Hazards and Hazardous Materials

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

The following section summarizes and incorporates the reference information from the following reports (contained in Appendix F to this SCEA):

F.1: Phase I Environmental Site Assessment, 316 N. Juanita Avenue, Los Angeles, California, prepared by EBI Consulting, dated July 26, 2018.

F.2: Phase II Environmental Site Assessment, 316 N. Juanita Avenue, Los Angeles, California, prepared by EBI Consulting, dated December 26, 2019.

F.3: Phase I Environmental Site Assessment, 3812-3838 Oakwood Avenue, Los Angeles, Los Angeles County, California 90004, prepared by AEI Consultants, dated March 11, 2019.

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. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of five eight-story multi-family residential buildings with 247,812 square feet of floor area including 11,772 square feet of supportive services. During the operation of the Proposed Project, only modest amounts of hazardous materials typically associated with residential land uses—cleaning supplies, paints, and solvents— would be found at the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Construction could involve the use of potentially hazardous materials, including paints, solvents, vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard.

The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable

frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following analysis summarizes the findings and conclusions of the site-specific Phase I and Phase II ESAs for 316 Juanita Avenue and a Phase I ESA for 3812-3838 Oakwood Avenue that are provided in their entirety in Appendix F to this SCEA.

316 Juanita Avenue Phase I ESA (Appendix F.1)

On July 23, 2018, EBI Consulting staff conducted a site reconnaissance of the subject property. Materials observed at the Project Site included petroleum hydrocarbon automotive fluids, miscellaneous automotive fluids, and miscellaneous flammable materials. Stains, spills, or evidence of a release were generally not noted in the areas observed except for minor staining. EBI also identified one approximately 185 gallon aboveground storage tank (AST). No significant releases or concerns were visually identified.

Records Review

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources (EDR). As concluded in the Phase I ESA, the subject property is identified on the following database listings:

- *RCRA Hazardous Waste Generators:* The subject property was identified (Pacific Bell, 316 Juanita Avenue) with a regulatory status of containing a small quantity generator in 1990. No violations have been reported.
- *California Water Resources Control Board (WRCB) – Leaking Underground Storage Tanks (LUST):* The subject property and 27 sites were identified on the LUST database with 0.5 mile of the subject property. The Phase I ESA concluded that the subject property and all 28 sites are unlikely to represent an environmental concern.
- *State AST/UST Databases:* The subject property and adjacent sites were identified on the UST/AST databases, however, the Phase I ESA conclude that all sites listed do not represent a known environmental concern at this time.

- *Hazardous Waste and Substances Sites List (Cortese):* The subject property was identified on the Cortese database as a duplicate listing to the LUST database.

- *Hazardous Waste Information System (HAZNET):* The subject property was identified on the HAZNET database for the generation of regulated wastes from 1993 to 2016 with over 177 manifest entries reported that included the following waste types: oil/water separator sludge, liquids with halogenated compounds, aqueous solutions, unspecified solvent mixture, empty containers, off-spec/aged/surplus organics, and unspecified organic mixture. This activity is consistent with automotive services and EBI's observations and does not indicate that a release has occurred.

- *Non-ASTM Databases:* The subject property (AT&T California, 316 Juanita Avenue) was identified on the Facility Index System (FINDS) due to the site's reporting to the State CERS system under the hazardous materials program. This is consistent with the site's vehicle maintenance activities and does not indicate that a release has occurred.

Findings

The Phase I ESA has identified no evidence of recognized environmental conditions (RECs) in connection with the subject property except for the following:

> AT&T has been engaged in automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 316 Juanita Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to 316 Juanita Avenue.

In addition, the following historical recognized environmental conditions (HREC) and *de minimis* conditions and considerations outside the scope of ASTM Practice E 1527-13 were identified in connection with 316 Juanita Avenue.

Historic USTs and related LUST cases at 316 Juanita Avenue have been resolved. These are considered HRECs for 316 Juanita Avenue and no further action appears warranted.

EBI conducted a limited screening survey for the presence of asbestos containing materials (ACM) at 316 Juanita Avenue. EBI identified friable suspect ACM in the form of plaster and/or sheetrock and joint compound wall systems, ceiling tiles and ceiling panels and non-friable suspect ACM in the form of vinyl flooring, mastic and roofing materials. These materials were observed to be generally undamaged and in fair to good condition at the time of this assessment. Please note that this survey was limited to visual observations of accessible areas and that the scope of work for this assessment did not include the collection and laboratory analysis of bulk samples of undamaged suspect ACM. Additional suspect ACM may be present in inaccessible areas, including, but not limited to, roofs, pipe chases behind solid walls and ceilings, concealed floor coverings, the interior of machinery or equipment, or water and sewer systems.

316 Juanita Avenue Phase II ESA (Appendix F.2)

The primary objective of the Phase II ESA was to evaluate potential impact to the subject property from the RECs identified in the Phase I ESA prepared by EBI (July 26, 2018), as discussed above. The investigation focused on: 1) interior locations in the approximate location of the three former underground hydraulic lifts; and 2) exterior locations near the oil/water separator (OWS) and former wash rack.

A total of five borings (B-1 through B-5) were advanced at 316 Juanita Avenue using a direct push rig operated by J&H Drilling Co., Inc. of Buena Park, California. The boring locations are shown in Figure 6.2, Boring Location Map. Laboratory soil analytical results and complete laboratory data sheets and chain-of-custody documentation are presented in Appendix F.2 to this SCEA. The results of the field screening, soil sampling, and groundwater sampling analyses are described below.

Field Screening

The vapor headspace of each soil sample was field-screened using a photoionization detector (PID). The PID provides a reading of total ionizable VOCs. A strong petroleum odor and possible staining was observed in the soil sample collected from a depth of 20-25 feet bgs in boring B-1 with a PID reading of 15.0 ppmV. A strong petroleum odor was observed in the soil sample collected from a depth of 25-28 feet bgs in boring B-5 with a PID reading of 35.1 ppmV. No other visual or olfactory evidence of contamination or elevated PID readings above background was observed in the other soil samples collected.

Source: EBI Consulting, Inc., December 26, 2018.

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Figure 6.2
Boring Location Map

Soil Sampling and Analysis

Selected "grab" soil samples (of approximate 6" intervals) from the borings were collected in laboratory provided sample containers. Each sample was labeled/logged onto a chain-of-custody form, and placed in a cooler with ice for preservation in accordance with current Federal EPA SW-846 (3rd ed.). The samples were submitted to an independent qualified laboratory (SGS Laboratories) for analyses. The samples were analyzed for the target analytes volatile organic compounds (VOC) (via EPA method 8260), polycyclic aromatic hydrocarbons (PAHs) (via EPA method 8270), and total petroleum hydrocarbons (TPH) (via EPA method 8015), and polychlorinated biphenyls (PCBs) (via EPA Method 8082). The soil sample results of analysis revealed the following:

1) No PCBs were detected[57] at concentrations greater than the laboratory method detection limits in the samples submitted for those analyses.

2) No VOCs were detected in the soil samples collected from borings B-1 and B-2 except acetone, 2-butanone (MEK), methylene chloride, and toluene. None of the detected concentrations exceeded the corresponding DTSC-SLs for residential and commercial/industrial soil. It is noted that concentrations of acetone and toluene were detected in the associated laboratory method blank sample.

3) TPH-DRO and TPH-ORO were detected at concentrations greater than the laboratory method detection limits in each of the soil samples submitted for analysis. None of the detected concentrations exceeded the corresponding Tier 1 ESLs except those detected in the 7.5 to 10 foot sample collected from boring B-3.

4) The PAHs benzo(g,h,i)perylene and indeno(1,2,3-cd)pyrene were detected in the soil sample collected from boring B-2. None of the detected concentrations exceeded the corresponding DTSC-SLs for residential and commercial/industrial soil.

Groundwater Sampling and Analysis

The groundwater sample results of analysis revealed the following:

a) No PAHs or PCBs were detected at concentrations greater than the laboratory method detection limits in the samples submitted for those analyses.

[57] *"Detected" means that the analyte concentration exceeded the laboratory reporting limit.*

b) No VOCs were detected except m,p-xylenes and MTBE. None of the detected concentrations exceeded the corresponding regulatory screening values except MTBE in the sample collected from boring B-2.

c) TPH-DRO and TPH-ORO were detected in each of the samples at concentrations that exceeded the corresponding Tier 1 ESLs for groundwater.

Conclusions

Based on the findings of this Phase II ESA, EBI concludes that significant subsurface impacts related to the historical uses of the OWS, former wash rack, and hydraulic lifts were not identified. The soil and groundwater results show that the contaminant concentrations (e.g., TPH-DRO, TPH-ORO, and MTBE) detected in the samples collected during EBI's 2018 Phase II ESA investigation are comparable to those collected by others during previous sampling events prior to 2009, for which the (Regional Water Quality Control Board (RWQCB) issued a 2009 No Further Action (NFA) determination .

3812-3838 Oakwood Avenue (Appendix F.3)

On March 7, 2019, AEI Consultants staff conducted a site reconnaissance of the subject properties at 3812-3838 Oakwood Avenue. Materials observed at the Project Site included a storm drain and three-chambered clarifier system on the central portion of 3812-3814 1/2 Oakwood Avenue, adjacent to the Galindo Commissary food truck parking area. The clarifier was installed in 1995, and is used for occasional food truck rinsing. No evidence of wash detergents or chemicals was observed onsite. Reportedly, engine and undercarriage washing are not performed onsite. While some diluted concentrations of the petroleum products and hazardous materials used on site may be present in the waste streams discharged to the drain, they drain system is not expected to represent a significant environmental concern at this time. Cleaning supplies and detergents are stored on the ground floor of 3820-3838 Oakwood Avenue. All chemicals were packaged in consumer quantities. Based on the nature of these materials, the presence of cleaning supplies at the subject property is not expected to represent a significant environmental concern.

Records Review

AEI contracted Environmental Data Resources (EDR) to conduct a search of publicly available information from federal, state, tribal, and local databases containing known and suspected sites of environmental contamination and sites of potential environmental significance. As concluded in the Phase I ESA, 3812-3838 Oakwood Avenue is not identified on any of the database listings

Findings

The Phase I ESA identified no evidence of recognized environmental conditions (RECs), no Controlled Recognized Environmental Conditions (CREC), and no Historical Recognized Environmental Conditions (HREC) in connection with 3812-3838 Oakwood Avenue. AEI recommended no further investigation for 3812-3838 Oakwood Avenue property at this time.

In summary the Phase I ESAs concluded there is no evidence of recognized environmental conditions (RECs) in connection with 3812-3838 Oakwood Avenue except for prior automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 3812-3838 Oakwood Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to 3812-3838 Oakwood Avenue. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected in some of the roofing, flooring, wall and ceiling materials, caulking/putties, adhesives, spackling compounds, and insulation materials, as well as other building materials that may be used at 3812-3838 Oakwood Avenue.

Construction activities are subject to strict regulatory requirements for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures during site clearing, grading, and construction, potential impacts associated with the release of a hazardous material would reduce impacts to a less than significant level.

Thus, the Proposed 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 would be less than significant.

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

Less Than Significant Impact. A project-related significant adverse effect may occur if the project site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

There are five schools within one-quarter mile of the Project Site: Virgil Junior High School, Dr. Sammy Lee Elementary Medical and Health Science Magnet, Central City Value High School, Frank Del Olmo Elementary School, and Camino Nuevo High School. The Proposed Project has the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. As noted in Section 6.3, Air Quality, above, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable localized construction thresholds of significance for any sensitive receptor within 25 meters of the Project Site. The nearest school campus is the Virgil Junior High School, located approximately 320 feet (approximately 98 meters) to the south of the Project Site. As such, none of the schools within the area would be exposed to significant localized air quality impacts.

Based on the findings of the Phase I ESA, the historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a recognized environmental condition (REC) to the Project Site. Due to the age of structures on the Project Site, the presence of asbestos containing materials (ACM) and lead based paint (LBP) is also suspected. Compliance with existing laws and regulations would ensure potential impacts associated with these conditions are reduced to less than significant levels. SCAQMD Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities), for example, requires that all materials that may be disturbed during a renovation or demolition project must be surveyed for the presence of asbestos and asbestos condition by a Certified Asbestos Consultant (CAC) or Certified Site Surveillance Technician (CSST) prior to any demolition or renovation activity. Construction activities are subject to strict regulatory requirements

for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. As such, construction of the Proposed Project would not emit hazardous emissions within one-quarter mile of an existing school. Furthermore, the Proposed Project's proposed haul route would not pass by any of the identified schools, which would therefore minimize, to the greatest degree possible, hauling impacts to the aforementioned schools. As such, impacts related to nearby schools would be less than significant.

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

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 from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Hazardous Waste and Substance Site List (also known as the Cortese List) is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information regarding the location of hazardous materials releases. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. The DTSC is responsible for preparing a portion of the information that comprises the Cortese List, and other state and local government agencies are required to provide additional hazardous material release information for the Cortese List. As noted in the Phase I ESA for 316 Juanita Avenue, 316 Juanita Avenue was identified on the Cortese database as a duplicate listing to the LUST database. Based on the findings of the Phase I ESA, the historic UST and LUST cases have been resolved. One UST removed in 1989 found some contamination in soil. However, subsequent investigation suggested the oil was naturally occurring in the rock and not from the UST. The agency concurred and case closure was issued in 1996. The second UST was removed in 1992 and soil sampling

results were Non-Detect (ND). A diesel UST was then installed. Two 12,000-gallon gasoline USTs and a waste oil UST were located further south at the current garage/maintenance building with the removal/reinstallation conducted in 1992. The waste oil UST was removed in 1990 and one soil sample showed ND. The most recent 12,000-gallon UST was removed in 2004 and contamination was found. This tank was the subject of the LUST case that was issued closure in 2009.

The Phase I ESA for 316 Juanita Avenue also identified 27 sites located within 0.5 mile of 316 Juanita Avenue that were identified on the Cortese List which are primarily duplicate listings to the LUST and Envirostor databases. The Phase I ESA concluded there is no evidence of recognized environmental conditions (RECs) in connection with the subject property except for prior automotive service activities that include petroleum hydrocarbons and generate regulated wastes (used oil and other automotive fluids such as automatic transmission fluid and antifreeze) and has operated automotive lifts since at least 1975. These operations are suspect to have occurred on 316 Juanita Avenue prior to construction of the vehicle maintenance building that was constructed in 1975. AT&T also operates an in-ground oil/water separator and currently three aboveground hydraulic lifts. These lifts replaced underground hydraulic lifts in 2010 and a portion of the foundation was replaced at that time, per the Building Department record. No data regarding this activity was otherwise identified. The historic use of regulated materials, generation of regulated wastes, and presence of the in-ground automotive lifts and oil/water separator are considered to represent a REC to 316 Juanita Avenue. Due to the age of structures on the Project Site, the presence of ACM and LBP is also suspected in some of the roofing, flooring, wall and ceiling materials, caulking/putties, adhesives, spackling compounds, and insulation materials, as well as other building materials that may be used at the Project Site.

As stated above, construction activities are subject to strict regulatory requirements for handling and treatment of potentially hazardous materials. Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and HUD regulations and the U.S. EPA's Lead-Based Paint RRP. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Furthermore, all demolition related activities would be conducted in accordance with CCR Title 22, 66261-66265, Health and Safety Code 25189.5 and all additional pertinent environmental and Cal-OSHA regulations. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures during site clearing, grading, and construction, potential impacts associated with the release of a hazardous material would reduce impacts to a less than significant level.

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

No Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport and subject to a safety hazard. The closest public airport to the Project Site is Bob Hope Airport, located approximately 9 miles northwest of the Project Site, well outside of the two mile threshold. Furthermore, the Project Site is not in an airport hazard area. Based on the above, the Proposed Project would not have the potential to result in a safety hazard for people residing or working in the project area, and no impact would occur.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is not located along a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.[58] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[59] Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would include a street vacation of Oakwood Avenue and of the northern portion of Madison Avenue between Oakwood Avenue and the main project entrance along Madison Avenue where the proposed turnaround is located. A firetruck turnaround would be constructed along Madison Avenue at this location. Furthermore, Oakwood Avenue functions as a local street to access the Project Site and S. Juanita Avenue and does not provide through access to Vermont Avenue. As such, the vacation would not interfere with an evacuation route for surrounding properties. Therefore, the Proposed Project

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[58] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

[59] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995*.

would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

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

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[60] Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects identified in Section 3, Project Description, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant with adherence to all applicable federal and state regulations and regulatory compliance measures. Therefore, the Proposed Project would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials and implementation of appropriate regulatory compliance measures, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

[60] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, accessed May 2019.*

6.10 Hydrology and Water Quality

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

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

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduce potential water quality impacts during the construction and operation of a project.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance

No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operational Impacts

The Project Site is currently developed with three commercial buildings, three single-family residential buildings, and one surface parking lot. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains located along Madison Avenue, Beverly Boulevard, Juanita Avenue, and Oakwood Avenue, and does not percolate into the groundwater table beneath the Project Site.[61] The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating the below stormwater pollution control measures that would regulate the amount and quality of stormwater leaving the Project Site.

The Proposed Project is required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project is also required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[62]

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[61] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed August 2019.*

[62] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve non-residential uses or include five or more residential units and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.[63] Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[64]

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation

[63] *City of Los Angeles Ordinance No. 183,833, 2015.*

[64] *Ibid.*

Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[65]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

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. A project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. As discussed in Section 6.10(a), the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is currently directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site.

According to the Geotechnical Report (Appendix D to this SCEA), water seepage was observed at depths ranging between 11.5 and 12.5 feet below the existing grade. The Geotechnical Report concluded that the seepage encountered does not represent the static groundwater level, but instead represents a perched condition of finite water in an impermeable zone. The historically highest groundwater level is not well defined for the Project Site, however, the closest contour is located about one mile northwest of the Project Site and corresponds to a depth of 20 feet below grade.[66] The Proposed Project does not propose any subterranean levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure

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[65] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

[66] *Geotechnical Report (See Appendix D of this SCEA).*

that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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

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

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on the Project vicinity, its currently fully developed and is largely impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. As discussed above, the Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented in compliance with the requirements of the Construction General Permit and will identify construction Best Management Practices (BMPs) to control erosion and siltation during construction activities. For project operations, the Project Site would be 100 percent impervious and surface water runoff would be directed to existing storm drain infrastructure. Surface water runoff would be controlled through site design and engineering practices in accordance with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176) and the Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which would ensure the developed site does not contribute to substantial erosion or siltation off-site. As such, impacts to erosion or siltation would be less than significant. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

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

Less Than Significant Impact. As stated above in Section 6.10(a) and (c)(i), the Project Site is 100 percent impervious. Surface water runoff under proposed conditions would comply with the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID

Ordinance would ensure the site is developed with BMPs designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Proposed Project as compared to the existing conditions. Therefore, the Proposed Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and impacts associated with the potential for off-site flooding would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system. As addressed above, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located on Madison Avenue, Beverly Boulevard, Juanita Avenue, and Oakwood Avenue.[67] Following the development of the Proposed Project, runoff from the Project Site would be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. As discussed in Section 6.10(c)(iii), above, compliance with the City's LID Ordinance would ensure the volume of post-development surface water runoff is reduced under the Proposed Project as compared to the existing conditions. Compliance with the LID Ordinance would also ensure BMPs are implemented to treat the quality of surface water runoff before being discharged into the stormdrain system. Therefore, impacts to the stormwater drainage system would be less than significant.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the

[67] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed August 2019.*

area is outside the 0.2% annual chance floodplain.[68] The Project Site is an infill site and is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows, and no impact would occur.

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

Less Than Significant Impact. The Geotechnical Investigation states that the Project Site does not lie within the mapped tsunami inundation boundaries. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Per the County of Los Angeles Flood and Inundation Hazards Map (Leighton, 1990), the Project Site lies within mapped inundation boundaries due to a seiche or a breached upgradient reservoir.[69] The development of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Thus, a less than significant impact would occur.

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

Less Than Significant Impact. As specified above, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the Proposed Project would be developed with Best Management Practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. As discussed above, the Proposed Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. Therefore, neither construction nor operation of the Proposed Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area is served

[68] *Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1610F, September 26, 2008, website: https://msc.fema.gov/portal/, accessed May 2019.*

[69] *Geotechnical Report (See Appendix D of this SCEA).*

by the existing City storm drain system. Runoff from the development sites and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site or the related project sites, since this part of the City is already fully developed with impervious surfaces.

The Proposed Project and each related project would be required to implement a SWPPP and/or SUSMP. Under the requirements of the LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems and water quality would be less than significant.

6.11 Land Use and Planning

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

a) Physically divide an established community?

No Impact. A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be

disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located within an urbanized area of the Wilshire Community Plan Area and is consistent with the existing physical arrangement and land use pattern of the properties within the vicinity of the Project Site. As discussed in Section 3, Project Description, the Project Site is surrounded by a mix of residential (including permanent supportive housing), commercial, and light industrial/manufacturing uses. These land uses range in height from one- to nine-stories in height above grade. Properties surrounding the Project Site to the west, east and south are zoned M1-1 with a Limited Industrial land use designation. Other properties in proximity of the Project Site are zoned PF-1XL, R4-1, C2-1, and [Q]CM-1 with land use designations of Public Facilities - Freeway and Neighborhood Office Commercial.

The Proposed Project includes the demolition of three existing commercial buildings previously used for the commercial operation of a telecommunications company, three existing single-family residential buildings, one surface parking lot, and the removal of 4 non-protected trees. The Project includes the renovation of an existing 5,663 square-foot two-story office building above a one-level partially subterranean garage, and the construction, operation, and maintenance five eight-story multi-family buildings with 454 dwelling units, of which 449 are permanent supportive housing and five managers' units, and related social services. The Applicant is seeking a Zone Change to the CM (Commercial Manufacturing) Zone, which allows Qualified Permanent Supportive Housing Projects. The Project vicinity contains a mix of land uses including a permanent supportive housing development east of the Project Site, a residential rehabilitation center north of the Project Site, and several multi-family properties west of the Project Site. Therefore, the Project vicinity contains multi-family and affordable housing developments similar to the Proposed Project. Furthermore, the Proposed Project would be consistent with the PATH residential homeless site located to the east of the Project Site (across Madison Avenue) which are conditionally approved residential land uses within the M1-1 Zone. As such, no separation of uses or disruption of access between land uses types would occur as a result of the Proposed Project. The proposed vacation of Madison Avenue, Juanita Avenue and/or Oakwood Avenues would not separate, divide, or disrupt any surrounding land uses as there are no land uses north of Oakwood Avenue between Westmoreland Avenue and Juanita Avenue. The area along the northern side of Oakwood Avenue is improved with a sidewalk, a landscaped buffer and the Hollywood (101) Freeway. As such, neither the Proposed Project nor the proposed vacation would disrupt or divide the physical arrangement of the established community, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD.

At the local level, the Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the project area. Namely, these plans and policy areas include the following: Wilshire Community Plan Area, the Wilshire/Koreatown Redevelopment Project Area, the Vermont/Western TOD Station Neighborhood Area Plan, the Los Angeles State Enterprise Zone. The Project Site is also within a Transit Priority Area (TPA) pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.[70] These documents guide development at the Project Site.

Regional Plans

SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area for ozone, PM_{10} and $PM_{2.5}$.

For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

[70] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed February 2019.*

As discussed in Section 6.14(a), the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High Quality Transit Areas (HQTA). Thus, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP.

SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy

The Project Site is located within the six-county region that comprises the SCAG planning area. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities. The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would redevelop a site that is currently developed with three commercial buildings, three single-family residential buildings, and one surface parking lot, and would include the construction of five eight-story multi-family buildings. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities within a High-Quality Transit Area (HQTA). Furthermore, as the Proposed Project would add approximately 454 residential units to the community, generating a net increase of approximately 564 new residents,[71] the Proposed Project would be consistent with SCAG growth projections.

Local Plans

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.[72]

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[71] *See Section 6.14 Population and Housing.*

[72] *City of Los Angeles Department of City Planning, General Plan Elements, website: https://planning.lacity.org/GP_elements.html, accessed March 2019.*

The elements that would be most applicable to the Proposed Project are the Framework Element, Housing Element, Wilshire Community Plan (Land Use Element), Plan for a Healthy Los Angeles, and the Mobility Plan (Circulation Element). The Project Site is designated under the General Plan as Limited Industrial, and is located in the corresponding M1-1 Zone. The Proposed Project is requesting a General Plan Amendment to the Commercial Manufacturing land use designation, and a corresponding Zone Change to the CM-1 Zone. Residential units are not permitted in the M1 Zone unless an existing industrial building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. Subarea D allows uses of the CM Zone, except that Projects with hotel, motel, apartment hotel, and residential uses are prohibited. The Proposed Project will comply with all LAMC and City Charter provisions necessary to obtain the General Plan Amendment and Zone Change.

Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Wilshire Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The General Plan Framework Element provides a 2010 projection of 65,525 persons, 24,230 households, and 39,500 additional jobs. The General Plan Framework anticipated population, dwelling unit, and employment levels of 337,144 persons, 138,330 dwelling units, and 197,959 jobs, respectively, for the Wilshire Community Plan. The Wilshire Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Framework Element provides citywide guidelines and a foundation on which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. A detailed consistency analysis with the Framework Element's goals, objectives, and policies relevant to the Proposed Project is provided in Appendix M to this SCEA. As provided in Appendix M, the Proposed Project is substantially consistent with the applicable policies of the General Plan Framework Element.

Housing Element

The Housing Element of the Los Angeles General Plan was adopted on December 3rd, 2013 and designed to ensure the City's evolving housing needs are met. Within the Housing Element, there are four goals that are used to accommodate future growth, preserve the unique collection of neighborhoods that characterizes Los Angeles, and ensure that all residents have access to a high quality of life. Those four goals are all relevant to the Proposed Project and are identified below:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.
- A City which housing helps to create safe, livable and sustainable neighborhoods.
- A City where there are housing opportunities for all without discrimination.
- A City committed to ending and preventing homelessness.

The Proposed Project is consistent with all of the goals of the Housing Element by providing the community with a Permanent Supportive Housing for target population members. The Proposed Project provides the community with a greater diversity in type and cost of housing in order to make housing available to a larger range of income levels. These units, available to all individuals without discrimination, will provide housing options and support services. Further, the Proposed Project will contribute to the development of sustainable and walkable neighborhoods by encouraging pedestrian uses and utilization of transit options, all within walking distance of the Project Site. The Proposed Project's consistency with the applicable goals, objectives, policies, and programs of the Housing Element are provided in Appendix M to this SCEA. As provided in Appendix M, the Proposed Project is substantially consistent with the applicable policies of the Housing Element.

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan Area. Therefore, all development activity on-site is subject to the land use goals, objectives and policies of the Wilshire Community Plan (Community Plan). The Project Site has a General Plan land use designation of Limited Manufacturing. The Limited Manufacturing land use designation contains numerous policies designed to enhance industrial and commercial activity, it also contains many policies designed to stimulate the development of industrial and commercial uses within certain industrial zones. The Los Angeles Municipal Code does not allow for residential development within certain manufacturing zones. Therefore, the Proposed Project is requesting a General Plan Amendment to re-designate the site

to Commercial Manufacturing land use which would allow for the zone change to CM-1 which would allow the site to be developed as proposed.

The Proposed Project would revitalize the area with the development of both Permanent Supportive Housing and the necessary support services. The Proposed Project would provide a total of 247,812 square feet of residential space, including 11,772 square feet of service space (including 5,700 square feet of case management space and 6,072 square feet of indoor open space), and a total of 23 automobile parking spaces. A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the Wilshire Community Plan for Residential Land Uses is contained in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Wilshire Community Plan.

Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan

The Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) consists of an area that includes all or parts of the Hollywood and Wilshire Communities and is generally bound by Franklin Avenue to the north; Virgil Avenue to the East; West 3rd Street to the South; and Canyon Drive to the West. The intent of the Specific Plan is to implement the goals and policies of the Hollywood Community Plan, Wilshire Community Plan, City General Plan Framework and Transportation Elements. To assist in implementation of goals and policies, the Specific Plan area is further divided into subareas grouped by land use elements. The Proposed Project is located within Subarea D. The Proposed Project is requiring a Specific Plan Amendment to change the site from Subarea D (Light Industrial/Commercial) to a newly created Subarea D.2 (Permanent Supportive Housing) with associated Development and Standards that would allow for a compatible design of a permanent supportive housing at this site. A detailed analysis of the consistency of the Proposed Project with the applicable policies of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan is provided in Appendix M, General Plan Consistency Findings. As shown in Appendix M, with approval of the requested discretionary entitlements including the proposed zone change and General Plan Amendment, the Proposed Project would be substantially consistent with the applicable policies of the SNAP.

Mobility Plan 2035 (Circulation Element)

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, amendment adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Proposed Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households are have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035;
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

With respect to the Mobility Plan's stated objectives, the Proposed Project would increase residential and social service uses within ½ mile to the Transit Enhanced Network and Bicycle Lane Network, therefore increasing the combined mode split of persons who travel by walking, bicycling, or transit. A detailed discussion of the Proposed Project's consistency with the Mobility Plan is provided in Appendix M to this SCEA. As shown in Appendix M, the Proposed Project would promote the goals of the Mobility Plan.

Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles (Plan) lays the foundation to create healthier communities for all residents of the City. As an Element of the General Plan, the Plan provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

With a focus on public health and safety, the Plan provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive.

The Plan accomplishes two policy objectives: it elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City.

The Plan is underpinned by seven goals and identifies new policies and possible programs that serve as the implementation blueprint for creating healthier neighborhoods. Implementation of the Plan is addressed through programs, ordinances, and Community Plans, among other planning policy documents, which allow for the flexibility needed to address the specific needs of the City's diverse communities. References to neighborhoods usually reflect the Community Plan Area boundaries used by the Department of City Planning, but the City recognizes the fluidity and diversity of the City's neighborhoods. The Project's consistency with applicable goals in the Health and Wellness Element is presented in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Plan for a Healthy Los Angeles.

Wilshire Center / Koreatown Redevelopment Project Area

The Project Site is located within the Wilshire Center/Koreatown Redevelopment Project Area. The Wilshire Center/Koreatown Redevelopment Project Area, effective December 13, 1995, is valid until December 13, 2025.[73] As such, the Proposed Project would need to be reviewed for compliance with the Wilshire Center/Koreatown Redevelopment Project. Pursuant to City Ordinance 183,325 (effective 11/11/19), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the City. The purpose of the Redevelopment Plan is to implement the Community Plan's goals for the revitalization of the Wilshire Center/Koreatown neighborhood. A detailed analysis of the consistency of the Proposed Project with the applicable goals of the Redevelopment Plan

[73] *City of Los Angeles Community Redevelopment Agency – Los Angeles, Wilshire Center/Koreatown, website: http://www.crala.org/internet-site/Projects/Wilshire_Center/workprogram.cfm, accessed March 2019.*

is contained in Appendix M, General Plan Consistency Findings, to this SCEA. As shown in Appendix M, the proposed Project is substantially consistent with the applicable policies of the Wilshire Center/Koreatown Redevelopment Project.

Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located approximately 500 feet south of the Hollywood Freeway (US-101). The City Planning Commission has taken an increased interest in projects that will place sensitive populations in close proximity to freeways. ZI-2427 serves as an advisory notice to the public and development applicants of the potential health risks associated with land uses that are within 1,000 feet of a freeway, as defined by the Caltrans Highway Design Manual. Areas within 1,000 feet of a freeway are known to experience the greatest concentrations of fine and ultrafine particulate matter (PM), with greatest concentrations within 500 feet. The Proposed Project includes 454 units of Permanent Supportive Housing and 11,772 square feet of support services. Future building occupants will be exposed to elevated levels of particulate matter from vehicles traveling on the nearby freeway and adjacent streets. While recent court rulings[74] have held that CEQA does not require an analysis of the impacts of the environment on a project, the South Coast Air Quality Management District and City Planning Commission continue to recommend that, prior to project approval, impacts of air pollutants on people who would live in a new development project are addressed and appropriately mitigated to the extent feasible. Providing enhanced filtration in building Heating, Ventilation, and Air Conditioning (HVAC) systems is an effective mitigation measure to improve indoor air quality. As stated in LAMC Section 99.05.504.5.3, mechanically ventilated buildings located within 1,000 feet of a freeway shall provide air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value (MERV) of 13. The Proposed Project residential and service uses would be subject to the MERV standards of LAMC Section 99.05.504.5.3. As such, adherence to the LAMC and incorporation of project design features would ensure Project consistency with Freeway Advisory Notice (ZI-2427).

Enterprise Zone / Employment and Economic Incentive Program Area (EZ) (ZI-2347)

Designated by City Council resolution, and approved by the California Department of Commerce, Enterprise Zones receive Federal, State and City economic incentives to stimulate local investment and employment. This is accomplished through tax and regulation relief and improvement of public services. Enterprise Zones are entitled to special provisions with regards to certain design standards, including parking and height standards. These special provisions are elaborated upon below:

[74] *California Building Industry Association v. Bay Area Air Quality Management District (S213478, December 17, 2015).*

Parking Standards: LAMC Section 12.21 A 4 (X)(3)

Except for the Downtown Business District parking area described in Section 12.21 A 4 (i), projects within Enterprise Zones may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small.

Height: Section 12.21.4

Special height districts "EZ1", "EZ1-L", "EZ1-VL", "EZ1-XL", "EZ2", "EZ3", and "EZ4" were established for Enterprise Zones. Height District "EZ1" increases the total floor area contained in all the buildings on a lot to three times the buildable area. The height district suffix must be accomplished by a Zone Change.

The Proposed Project's residential use does not allow for utilization of a lower parking ratio in an Enterprise Zone. Further, the Proposed Project does not seek a Zone Change in order to utilize a special height district and increased Floor Area Ratio. Therefore, the Proposed Project is consistent with the Enterprise Zone Act Program.

Industrial Land Use Policy

The City's Industrial Land Use Policy (ILUP) project is a comprehensive study of the use of industrial-zoned land within the City of Los Angeles. As part of this effort, the January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (ILUP Memo) underscores that the City's adopted policy is to retain industrial land for job producing uses. The ILUP Memo contains "Attachment A-ILUP Geographically Specific Directions" which includes the Hollywood Wilshire Industrial Area Directions map.

According to the ILUP Geographically Specific Directions Map, the Project Site is located within Analysis Area 1 of the Hollywood Wilshire Analysis Area, which is designated as an Employment Protection District (EMP). EMP Districts are defined as "[a]reas where industrial zoning should be maintained, i.e., where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate."

In 2006, Analysis Area 1 was characterized as having 269 acres, 734 businesses and 8,374 jobs. Approximately 3.5 acres (1%) were comprised of Heavy Industry land uses, 218.6 acres (81 percent) were comprised of Light Industry land uses, 17 acres (6 percent) were comprised of Commercial land uses, 12 acres (4 percent) were comprised of Institutional land uses, 7.5 acres (3 percent were comprised of Residential land uses, 0.8

acres were comprised of Infrastructure land uses, and 9.7 (4 percent) was comprised of Miscellaneous land uses. The staff direction in the ILUP is to preserve industrial zoning consistent with the Hollywood Community Plan; allow industrial and ancillary commercial uses; and to encourage concentration of independent theaters along Santa Monica Boulevard between Lillian and Seward Avenues. The ILUP defines the Employment Protection District typology as "areas where industrial zoning should be maintained, and where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate."

While neither the ILUP project nor the ILUP Memo took specific action to change any land use designations or zoning with respect to industrial land, nor was it adopted by the City Council, the ILUP Memo was intended in part to provide general long-term guidance to City staff during the updating of community plans and related rezoning considerations. As part of the general observations noted in the ILUP Survey Report for the Hollywood Area, the Project Site is located within Survey Area 2 (SA2), which is designated as "Industrial/Commercial" land in the Vermont/Western Transit Oriented District. SA2 contains a variety of light to heavy industrial uses as well commercial, institutional and residential uses. Surrounded by residential and transit-oriented commercial development, SA2 has wide streets, small blocks and narrow/irregular parcels. Industrial uses include a mortuary, auto-related, veterinary, pest control, adult uses, and a "polleria," among others. Additionally, SA2 is home to a charter school and an LAUSD school expansion, as well as PATH, a homeless services center.

The Survey Report for Hollywood notes that the survey area includes entertainment-related light industrial uses, and is surrounded by a significant amount of commercial and residential development with multiple transit options. Its major industrial use - entertainment production and related industries - has been identified by the City of Los Angeles as an important growth industry. Subarea (SA2), the subarea in which the Project Site is located, contains a variety of light to heavy industrial uses as well commercial, institutional and residential uses. For SA2, small and irregular parcel configurations and the presence of two school sites (a charter school and an LAUSD school expansion) and housing are identified as issues that limit the potential for continued or expanded industrial use in the subarea. The Survey Report notes that land use regulations protecting areas adjacent to schools may threaten the operation of light and heavy industrial uses. The existing uses do not complement one another and create a sense of disorder. The residential, office and service uses on the north end are not compatible with the existing industrial uses.

The Survey Report for Hollywood concludes that the General Plan designates a large majority of the industrially zoned parcels in the Hollywood survey area as light industrial.

Two of the three sub areas selected in the Hollywood survey area [i.e., SA1 and SA3] contain entertainment-related uses that may warrant preservation. The Survey Report's concluding remarks for SA2 finds that the proximity to the 101 Freeway, existing zoning and separation from residential neighborhoods indicate that light to medium industrial uses appear to be appropriate in SA2. However, the Survey Report also indicates that regulations could be employed to ensure compatibility with schools and residential uses in the sub area.

With respect to the Project Site, it is important to note that the three existing residential dwellings that are located at 3812-3814 Oakwood were constructed in 1924 and 1939, respectively, and represent the original residential character of the area prior to the industrial land use designation. Thus, the Proposed Project's residential land uses would not introduce a new land use that does not already exist on the Project Site. Further, the existing land uses west of 3838 Oakwood (across Juanita Avenue) are zoned R4-1, designated for Commercial Office Neighborhood land uses and are improved with Restricted Affordable housing. The land uses to the immediate east (across Madison Avenue) include the PATH supportive housing project that has supported residential (homeless shelter) land uses at this location for over 15 years at this location. The PATH property is expanding to provide a total of 187 residential dwelling units in the M1-1 zone as authorized under a conditional use permit (CPC Case No. CPC-2014-1602-CU-SPE-SPP-DB-SPR-PA2). Thus Proposed Project's new residential development with permanent supportive housing is consistent with the pattern of development already occurring within the M1 Zone and Light Industrial land use designation immediately surrounding the Project Site. Within the block bounded by Juanita Avenue, Oakwood Avenue, Madison Avenue, and Beverly Boulevard, the only remaining land uses are two auto body shops and Dewey's Pest Control business, none of which involve heavy manufacturing land uses or light industrial operations. While these uses are permissible in the M1-1 zone they are also permitted in the CM zone. Thus, the introduction of new residential uses would not be incompatible with the existing remaining land uses on the block.

Moreover, the Proposed Project would be consistent with the Survey Report's suggestion to modify regulations to ensure compatibility with schools and residential uses in the subarea. The residential uses proposed would be compatible with those uses in a way that the current commercial uses are not.

In consideration of the information presented above, the Project would not result in a significant impact with respect to the City's policies regarding the use and preservation of industrial land use.

Residential Citywide Design Guidelines

The City of Los Angeles' City Planning Commission adopted the Citywide Design Guidelines on October 24, 2019. As part of the application for development, a requisite form for Project Submittal would be submitted to the Department of City Planning demonstrating that the Proposed Project would be in compliance with the Citywide Design Guidelines for a residential project and substantially consistent with the applicable design requirements for site planning, building orientation, entrances, relationship to adjacent buildings, building façade, building materials, sidewalks, on-street parking, off-street parking and driveways, on-site landscaping, open space and recreational activities, building signage, lighting and security, and utilities.

The Proposed Project promotes a pedestrian-friendly environment and incorporates landscaping along pedestrian rights-of-way along Oakwood Avenue, Juanita Avenue, and Madison Avenue. The Proposed Project would also include a lobby area, landscaped courtyards, and first-floor resident services which would support and promote pedestrian activity in the Project Site area. The Proposed Project incorporates a variety of architectural materials that complement each other; these architectural materials include: (metal railings, composite siding, vinyl clad windows and doors, standing seam siding, and fiber cement siding). The Proposed Project's design would complement the surrounding properties. Vehicle parking spaces and bicycle parking spaces would be provided interior to the Proposed Project within the first level. These design features would be executed in accordance with the Citywide Design Guidelines. Therefore, the Proposed Project complies with the Citywide Design Guidelines.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable.

6.12 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. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ-2) Area or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area or an Oil Drilling/Surface Mining Supplemental Use District. However, the Project Site is located within the boundaries of the state-designated LA City Oil Field.[75] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

[75] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, 1996.*

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. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area or an Oil Drilling/Surface Mining Supplemental Use District.[76] As discussed above, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Cumulative Impacts

No Impact. As discussed above, the Proposed would have no impact on mineral resources. Because the Proposed Project would not result in any impacts related to mineral resources, the Proposed Project would not have the potential to contribute to any cumulative impacts on mineral resources.

6.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

[76] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

> L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
>
> L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 30-45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage

hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a range of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5 dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.[77] Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.[78]

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[77] *California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.*

[78] *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006.*

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential, institutional, and hotel uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Appendix H, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 6.13, Existing Ambient Noise Levels in Project Site Vicinity. As shown in Table 6.13, the ambient daytime noise in the vicinity of the Project Site ranges from 58.6 to 76.6 L_{eq}. The maximum instantaneous noise level during the six 15-minute recordings was 102.2 dB L_{max} at Location F, where a motorcycle passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic, including cars, buses, and motorcycles, as well as active construction in the vicinity of the Project Site.

Table 6.13
Existing Ambient Noise Levels in the Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics [a]		
			L_{eq}	L_{min}	L_{max}
A	Southeast corner of Madison Avenue and Cosmopolitan Street	Light pedestrian and moderate vehicle traffic	58.6	47.4	81.8
B	East side of Westmoreland Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and vehicle traffic, ongoing construction for PATH Metro Villas	67.5	56.0	80.1
C	East side of Madison Avenue, between Oakwood Avenue and Beverly Boulevard	Moderate pedestrian and light vehicle traffic, ongoing construction for PATH Metro Villas	74.1	60.5	88.0
D	North side of Oakwood Avenue, between Juanita Avenue and Madison Avenue	Light pedestrian and moderate vehicle traffic, consistent traffic at the US-101 south on-ramp	66.7	54.0	85.9
E	West side of Juanita Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and vehicle traffic	63.8	52.3	86.2
F	East side of Vermont Avenue, between Oakwood Avenue and Beverly Boulevard	Light pedestrian and heavy vehicle traffic	76.6	59.5	102.2

[a] *Noise measurements were taken on June 13, 2019 between approximately 11:35 a.m. and 2:17 p.m. at each location for a duration of 15 minutes. See Appendix H of this SCEA for noise monitoring data sheets.*

Parker Environmental Consultants, 2019.

Sensitive Receptors

The surrounding land uses in the Project Site vicinity are generally office, commercial, multi-family, and light manufacturing land uses, most of which are not considered sensitive to noise. Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, sensitive receptors in close proximity (within 500 feet) to the Project Site were identified. Table 6.14 below provides a summary of the sensitive receptors by address and land use and their respective proximity to the Project Site. The locations of these land uses relative to the Project Site are depicted in Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map, above.

Table 6.14
Summary of Noise Sensitive Land Uses within 500 Feet of the Project Site

ID	Address	Land Use / Description	Distance to Project Site
1	335 Juanita Avenue	Multifamily residential building (permanent supportive housing)	60 feet
2	340 Madison Avenue	PATH multifamily residential building (permanent supportive housing) currently under construction	60 feet
3	3755 Beverly Boulevard	Stanton University and Sharon's Church	65 feet
4	400 Vermont Avenue	Delancey Street Foundation – multifamily residential building	115 feet
5	305 Westmoreland Avenue	Multifamily residential buildings along Westmoreland Avenue, north of Beverly Boulevard	210 feet
6	346 Vermont Avenue	Multifamily residential building on the east side of Vermont Avenue	250 feet
7	320 Vermont Avenue	Hubbard College	270 feet
8	152 Vermont Avenue	Virgil Middle School	320 feet
9	249 Juanita Avenue	Multifamily residential building on the west side of Juanita Avenue	325 feet
10	317-321 Vermont Avenue	Hotel buildings on the west side of Vermont Avenue	440 feet

See Figure 6.3, Noise Monitoring and Sensitive Receptors.
Source: Parker Environmental Consultants, 2019.

Source: Google Earth, Aerial View, 2019.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 6.3
Noise Monitoring and Sensitive Receptors

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 with Mitigation. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed 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). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source.[79] However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. A significant construction noise impact would also occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location, or if construction activities lasting more than ten days in a three-month period would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 6.15, Community Noise Exposure Level (CNEL), to increase by 3 dBA in CNEL within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels

[79] *As shown in Figure 3.2, Zoning and General Plan Land Use Designations, the properties surrounding the Project Site are zoned for Limited Manufacturing (M1-1). Thus, LAMC Section 112.05 is not applicable to the Proposed Project. Notwithstanding the M1 zone designations, the Proposed Project’s noise impacts upon adjacent residential and institutional land uses is addressed in this analysis in accordance with the LA CEQA Thresholds Guide.*

Table 6.15
Community Noise Exposure (CNEL)

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

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double.[80] In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Construction Impacts

Construction of the Proposed Project would require the use of heavy equipment for demolition, site preparation, grading/excavation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of

[80] *FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The Proposed Project's construction noise levels were estimated using the noise prediction and reference noise levels for construction equipment usage by phase based on the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM, Version 1.1 (2006)) (See Appendix H to this SCEA). The average (hourly Leq) construction noise levels by phase are based on the quantity, type, and usage factors for the construction equipment anticipated to be used during each phase of construction. The predicted construction noise levels at each of the sensitive receptors were then estimated based on respective distance between the source and the receptor and other factors that would affect the noise levels such as intervening structures or barriers that provide sound attenuation. The estimated exterior construction noise levels at the 10 sensitive receptor locations are shown in Table 6.16, Estimated Exterior Construction Noise at Nearest Sensitive Receptors.

As shown in Table 6.16, the highest construction noise levels would occur to sensitive receptors 1 through 4, which are directly adjacent to the Project Site across Madison, Oakwood and Juanita Avenues. Construction noise levels at these locations prior to mitigation would range from 83.3 dBA L_{eq} to 77.7 dBA L_{eq}. Construction noise would exceed ambient noise levels at receptor 1 by up to 19.5 dBA L_{eq}. At Sensitive Receptor Location 1 unmitigated construction noise levels are calculated to be 83.3 dBA. In comparison to the LAMC Section 112.05 construction noise limit of 75 dBA L_{eq}, construction noise would need to be attenuated by 8.3 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 14.5 dBA L_{eq} to ensure construction noise levels are reduced to less than significant levels. Accordingly, it is recommended that a temporary noise barrier be installed along the property line to block the line-of-sight between the noise sources and surrounding sensitive receptors, as required by Mitigation Measure N-4 (see below). The construction of a temporary ¾ inch plywood noise barrier would be capable of attenuating the noise level by approximately 20 dBA, which is sufficient to meet the 14.5 dBA attenuation required at this Sensitive Receptor location. As such, construction noise impacts to Sensitive Receptor 1 would be less than significant after mitigation.

Table 6.16
Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation

ID [a]	Address/Land Use [a]	Distance to Project Site (feet)	Existing Exterior Ambient Noise (dBA L_{eq})	Maximum Construction Noise Levels (dBA L_{eq})[b]	Construction Noise Significance Criteria (dBA L_{eq}) [b]	Noise Impact Above 75-dBA Threshold (dBA L_{eq})	*Noise Level Impact Above Ambient (dBA L_{eq})*
1	335 Juanita Avenue / Multifamily Residential	60	63.8	83.3	75.0	8.3	19.5
2	340 Madison Avenue / Multifamily Residential	60	74.1	83.3	75.0	8.3	9.2
3	3755 Beverly Boulevard / Institutional	65	63.8	82.6	75.0	7.6	18.8
4	400 Vermont Avenue / Multifamily Residential	115	66.7	77.7	75.0	2.7	11.0
5	305 Westmoreland Avenue / Multifamily Residential	210	67.5	63.3	75.0	0.0	-4.2
6	346 Vermont Avenue / Multifamily Residential	250	76.6	60.9	75.0	0.0	-15.7
7	320 Vermont Avenue / Institutional	270	76.6	70.3	75.0	0.0	-6.3
8	152 Vermont Avenue / Institutional	320	58.6	58.8	75.0	0.0	0.2
9	249 Juanita Avenue / Multifamily Residential	325	63.8	68.7	75.0	0.0	4.9
10	317-321 Vermont Avenue / Hotel Buildings	440	76.6	56.0	75.0	0.0	-20.6

Notes
[a] *See Figure 6.3, Noise Monitoring and Sensitive Receptor Location Map.*
[b] *Sensitive Receptor No. 5, 6, 8, and 10 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.*
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

At Sensitive Receptor Location 2 unmitigated construction noise levels are calculated to be 83.3 dBA. Construction noise would need to be attenuated by 8.3 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 4.2 dBA L_{eq} to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would provide up to a 20 dBA reduction in construction noise, which is more than sufficient to meet the attenuation required at this Sensitive Receptor location to be in compliance with the LAMC and not exceed the construction noise thresholds of

significance. As such, construction noise impacts to Sensitive Receptor 2 would be less than significant after mitigation.

At Sensitive Receptor Location 3 unmitigated construction noise levels are calculated to be 82.6 dBA. Construction noise would need to be attenuated by 7.6 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 13.8 dBA L_{eq} to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would ensure construction noise is in compliance with the LAMC and would not exceed noise thresholds of significance. As such, construction noise impacts to Sensitive Receptor 3 would be less than significant after mitigation.

At Sensitive Receptor Location 4 unmitigated construction noise levels are calculated to be 77.7 dBA. Construction noise would need to be attenuated by 2.7 dBA to be in compliance with the Code. With respect to the L.A. CEQA Thresholds Guide threshold noise levels would need to be attenuated by 6 dBA L_{eq} to ensure construction noise levels are reduced to less than significant levels. Implementation of Mitigation Measure N-4 would ensure construction noise is in compliance with the LAMC and would not exceed the noise significance thresholds. As such, construction noise impacts to Sensitive Receptor 4 would be less than significant after mitigation.

Due to their respective distances and intervening structures blocking the line of sight of the noise source to the receptor, construction noise levels at Receptor Locations 5 through 10 would be below 75 dBA limit of LAMC Section 112.05 and would be at or below ambient noise levels. As such none of these Receptor Locations would be significantly impacted by the Proposed Project.

In accordance with the provisions set forth in LAMC 112.05, implementation of Mitigation Measures N-1 through N-5 are recommended to ensure impacts associated with construction-related noise levels are mitigated to less than significant levels. A summary of the noise levels after mitigation is provided in Table 6.17, Construction Noise Levels After Mitigation. As shown in Table 6.17, with implementation of these measures, temporary construction-related noise impacts would be considered less than significant and in accordance with City requirements and standards.

Mitigation Measures:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

N-1 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

N-2 The project contractor(s) shall employ noise minimization strategies when using mechanized construction equipment. To the maximum extent practical, demolition and construction activities shall be scheduled and coordinated so as to avoid operating several pieces of equipment simultaneously, which cause high noise levels. Construction equipment shall not idle when not in use. The contractor shall place noise construction equipment as far from the Project Site edges as practicable.

N-3 The project contractor shall use power construction equipment with noise shielding and muffling devices to the extent available and feasible. The noise mufflers shall be consistent with manufacturers' standards and be equipped with all construction equipment, fixed or mobile.

N-4 The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 14.5 dBA reduction in sound level.

N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Table 6.17
Estimated Exterior Construction Noise
at Nearest Sensitive Receptors After Mitigation

ID [a]	Address/Land Use [a]	Existing Exterior Ambient Noise (dBA L_{eq})	Maximum Construction Noise Levels Before Mitigation (dBA L_{eq})[b]	Mitigation Attenuation Factor (dBA)	Construction Noise Level After Mitigation (dBA L_{eq}) [b]	Significant Impact After Mitigation? (Yes/No)
1	335 N. Juanita Avenue / Multifamily Residential	63.8	83.3	-20	63.3	No
2	340 N. Madison Avenue / Multifamily Residential	74.1	83.3	-20	63.3	No
3	3755 Beverly Boulevard / Institutional	63.8	82.6	-20	62.6	No
4	400 N. Vermont Avenue / Multifamily Residential	66.7	77.7	-20	57.7	No
5	305 N. Westmoreland Avenue / Multifamily Residential	67.5	63.3	NA	63.3	No
6	346 N. Vermont Avenue / Multifamily Residential	76.6	60.9	NA	60.9	No
7	320 N. Vermont Avenue / Institutional	76.6	70.3	NA	70.3	No
8	152 N. Vermont Avenue / Institutional	58.6	58.8	NA	58.8	No
9	249 N. Juanita Avenue / Multifamily Residential	63.8	68.7	-20	48.7	No
10	317-321 N. Vermont Avenue / Hotel Buildings	76.6	56.0	NA	56.0	No

Notes

[a] See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.

[b] Sensitive Receptor No. 5, 6, 8, and 10 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Based on estimated A-weighted noise ratings published for standard HVAC equipment,[81] sound power from rooftop mounted HVAC equipment would be expected to range from 69 dBA L_{eq} to 74 dBA L_{eq} at the source. Therefore, as a conservative estimate, a reference level of 74 dBA L_{eq} was utilized to analyze HVAC equipment noise levels. Based on the respective distances to the sensitive receptors the maximum noise level produced by the HVAC equipment, the highest anticipated noise level is approximately 60.3 dBA $L_{eq,}$ which occurs at Sensitive Receptor No. 1 and 2. As this noise level is significantly below the ambient noise level, the sound of HVAC equipment would not be audible at the neighboring sensitive receptors. As such, noise from mechanical equipment would be less than significant.

Off-Site Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. Based on the principles of roadway noise, it would take a doubling of the roadway's traffic to generate a perceptible increase (3 dBA) in the ambient roadway noise volume. If a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Transportation Study, the proposed development would result in a net increase of 407 net daily vehicle trips, including 49 AM peak hour trips and 37 PM peak hour trips. For purposes of analyzing the Proposed Project's traffic noise impacts, the traffic volumes at the two adjacent intersections analyzed in the Proposed Project's Transportation Study, Vermont Avenue & Beverly Boulevard and Beverly Boulevard & Temple Street &

[81] *Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons.*

Westmoreland were analyzed. The Proposed Project's estimated 407 average daily trips would represent a small percent increase in the daily traffic volume at these intersections. Therefore, the Proposed Project would not double the traffic along the closest intersections and thus would not exceed the 3-dBA CNEL threshold of significance at the nearby study intersections and roadways. Thus, the Proposed Project's mobile source noise impact would be less than significant.

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

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

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

Construction

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities

associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 6.18, below.

Table 6.18
Construction Vibration Damage Criteria

Threshold Criteria	PPV (in/sec)	Approximate RMS velocity in decibels (VdB) (re 1 micro-inch/second)
Building Category		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: Federal Transit Administration, Office of Planning and Environment
Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.

Table 6.19, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 6.19, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 6.19
Vibration Source Levels for Construction Equipment

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

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

Structural Vibration Impacts

There are three buildings immediately adjacent to the Project Site's property lines. As such, the Proposed Project's construction activities would have the potential to create groundborne vibration impacts to the surrounding structures. As shown in Table 6.20, below, the estimated vibration level at the nearest buildings located 10 feet from the Project Site is 0.21 PPV in/sec, which is well below the threshold of 0.3 PPV in/sec. As such, the Proposed Project's construction activities would have no groundborne vibration impact to any surrounding structures.

Table 6.20
Estimated Structural Vibration Damage Levels at Nearest Structures

No.	Sensitive Land Use	Distance from Project Site (ft)	Estimated Vibration Levels (PPV in/sec)	Threshold of Significance	Significant Impact?
1	340 Juanita Avenue (Commercial building west of the Project Site	<10 ft	0.21	0.3	No
2	3737 Beverly Boulevard (Commercial building south of the Project Site)	<10 ft	0.21	0.3	No
3	3701 Beverly Boulevard Commercial building south of the Project Site	<10 ft	0.21	0.3	No

Source: Source: Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006. Parker Environmental Consultants, 2019.

Operation

The Proposed Project is a residential development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) along Juanita Avenue, Oakwood Avenue, and Madison Avenue, the proposed land uses would not result in a substantial increase in the use 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, the collection of refuse would occur within the enclosed first-floor levels which would effectively attenuate groundborne vibration and noise impacts. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

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

No Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports or private air strips within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact with Mitigation. Development of the Proposed Project in conjunction with the related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The closest related project is Related Project No. 20 (PATH II Affordable Housing project), which is located east of the Project Site, across Madison Avenue. The PATH II Affordable Housing project is currently under construction and is anticipated to be completed with construction activities by the time the Proposed Project begins construction. As such, construction activities would not overlap and there would be no potential for cumulative construction noise impacts to occur. As such, the cumulative construction noise impacts would be less than significant with mitigation.

6.14 Population and Housing

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

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). As shown in Table 6.21, below, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Table 6.21
SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	3,845,500	4,609,400	20%
Los Angeles County	9,923,000	11,514,000	16%
SCAG Region	18,322,000	22,138,000	21%
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	1,325,500	1,690,300	28%
Los Angeles County	3,257,000	3,946,000	21%
SCAG Region	5,885,000	7,412,000	26%
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	1,696,400	2,169,100	28%
Los Angeles County	4,246,000	5,226,000	23%
SCAG Region	7,440,000	9,872,000	33%

Source: SCAG, adopted 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.

Construction Impacts

Construction job opportunities created as a result of the Proposed Project are not expected to result in any substantial population growth in the project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Proposed Project, and as such, significant housing or population impacts would not result from construction of the Proposed Project. Therefore, construction-related population growth impacts would be less than significant.

Operational Impacts

The Project Site is currently developed with three commercial buildings used for the commercial operation of a telecommunications company, three existing single-family residential buildings, and one surface parking lot. The Proposed Project would include the demolition of the existing structures on-site; the renovation of an existing two-story commercial office building, and the construction, operation, and maintenance of five eight-story multi-family buildings with 454 dwelling units, of which 449 are permanent supportive housing and five managers' units, and related social services. The Proposed Project's population generation is shown in Table 6.22. The construction of 454 additional dwelling units with would result in an increase in up to approximately 564 net permanent residents in the City of Los Angeles.[82] The proposed increase in housing units and population would be consistent with the SCAG forecast of additional households and persons in the City of Los Angeles between 2012 and 2040.

[82] *Based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database, the City of Los Angeles' citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

Table 6.22
Project Estimated Population Generation

Land Use	Quantity	Occupancy Rates	Total Population
Project			
Apartments	370 1-Bedroom Units	1 per room	370
	71 2-Bedroom Units	2 per room	142
	13 4-Bedrooom Units	4 per room	52
		Total Increase in Population	**564**

Note: DU = dwelling unit
[a] This estimate is based on the planned occupancy of the Proposed Project.
Source: Flexible PSH Solutions, 2020.

With respect to employment growth, the additional employees generated by the Proposed Project would contribute to a fraction of one percent of SCAG's employment growth forecast for the City of Los Angeles. Thus, the increase in employment opportunities as a result of the Proposed Project is within SCAG's employment growth forecast. It can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. Thus, any population growth generated by the Proposed Project would be well within SCAG's population growth projections.

Localized Growth Forecasts

Table 6.21 shows the Southern California Association of Government's (SCAG) population and housing growth for the City of Los Angeles to the year 2040. The Proposed Project's 454 new units and estimated 564 future residents would be well within SCAG estimates of growth for the City between 2012 and 2040. Therefore, the Proposed Project would result in a less than significant impact with respect to population, housing, and employment growth. Additionally, the Proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, impacts related to any substantial unplanned population growth would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of five eight-story multi-family buildings with 454 dwelling units, on a site that is currently occupied by three commercial buildings, three single-family residential buildings (3 units, all of which are currently occupied), and one paved surface parking lot. All tenants will be receive relocation payments pursuant to applicable law and replacement units will be constructed on-site.

The Proposed Project would result in a net increase of 451 units. As such, the Proposed Project would provide additional housing within the community for the underserved target population. Additinally, the displacement of the existing residential units would be temporary as the Proposed Project would provide a net increase in housing. Relocation assistance for the existing tenants would be provided in accordance with all applicable laws and regulations and as specified in the LAMC. The Proposed Project would be consistent with the Wilshire Community Plan, the Vermont/Western SNAP, and the Wilshire Center/Koreatown Redevelopment Plan Area by providing a 100 percent affordable housing development. The proposed residential uses would be consistent with the allowable uses as permitted by the zoning and General Plan land use designations. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in Section6.14(a), the Proposed Project would not exceed the growth projections of SCAG's 2016-2040 RTP/SCS for the City of Los Angeles subregion. Because population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Related projects would also be reviewed for consistency with regional growth projections. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

6.15 Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. 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. Section 15382 of the CEQA guidelines defines "significant effect on the environment" 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. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.[83]

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response

[83] *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

distance between high density residential and commercial land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles with a required fire flow of 4,000 gpm. If either of these performance criteria were exceeded, all structures located in the applicable commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Proposed Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. Construction activities of the Proposed Project would result in a less than significant impact to fire services.

Operation

A project would result in 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, the construction of which results in a significant impact upon the environment. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company, or a truck company is one

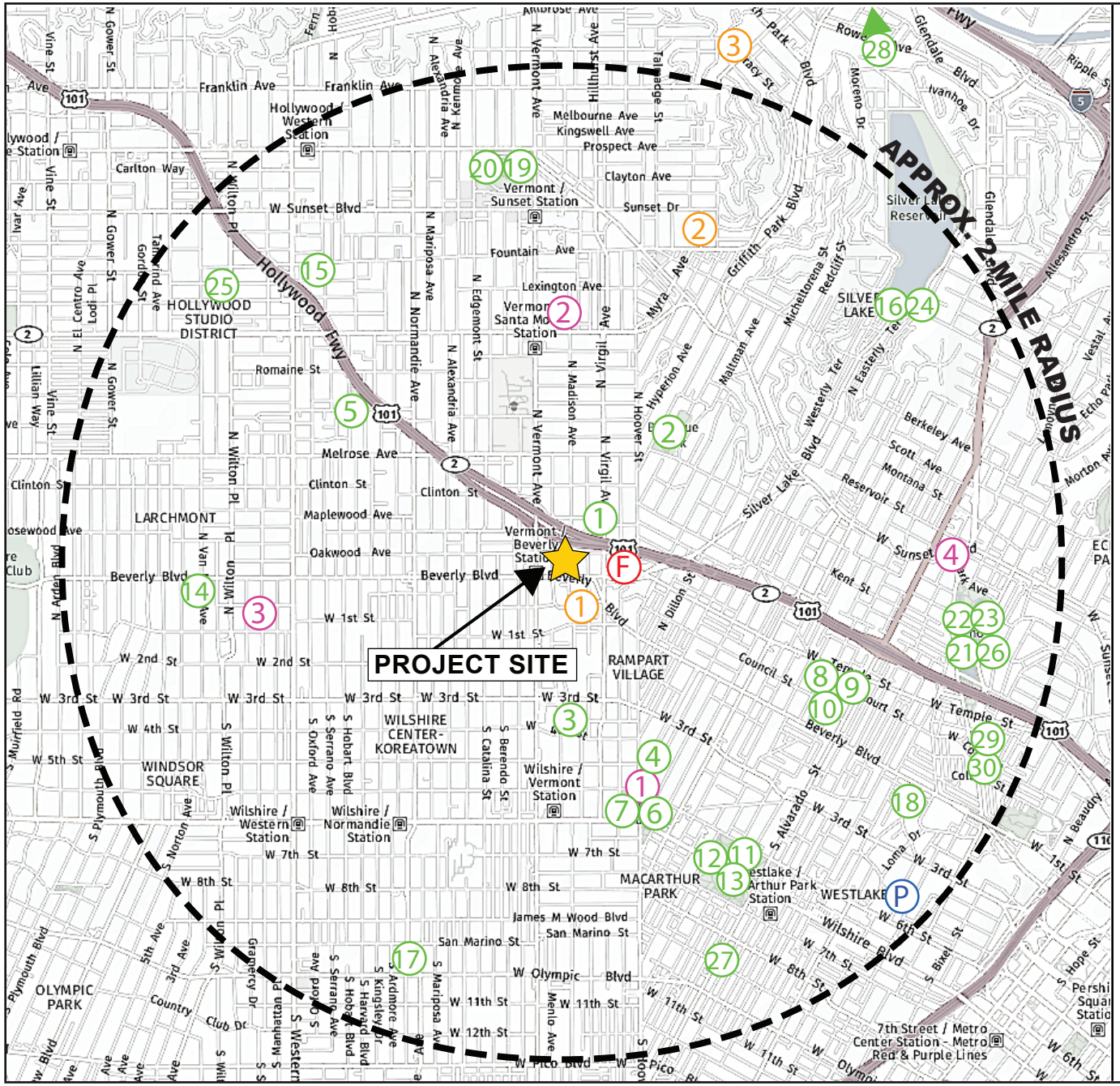
mile or 1.5 miles, respectively. If the distance is exceeded, all structures located in the applicable commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Proposed Project would include up to 454 dwelling units and 11,772 square feet of ground floor support services and would generate approximately 564 new residents.[84] The Proposed Project would increase the utilization of the Project Site, which is currently occupied by three commercial buildings, three single-family residential buildings, and one surface parking lot, and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 6, located at 326 N. Virgil Avenue, approximately 0.2 mile northeast (driving distance) of the Project Site. See Figure 6.4, Public Services in the Project Vicinity. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 6 to the Project Site, fire protection response would be considered adequate. The Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Beverly Boulevard, Juanita Avenue, Oakwood Avenue and Madison Avenue). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life

[84] *See Section 6.14, Population and Housing.*



LEGEND

- (F) LAFD Station No. 6
- (P) Rampart Division Police Station
- (#) Schools
  1. Dr. Sammy Lee Elementary Medical Health Science Magnet
  2. Thomas Starr King Middle School Magnet: Film and Media
  3. John Marshall Senior High School
- (#) Parks
  1. Madison West Park
  2. Bellevue Recreation Center
  3. Shatto Recreation Center
  4. Occidental Parkway
  5. Lemon Grove Recreation Center
  6. Lafayette Multipurpose Community Center
  7. Lafayette Skate Park
  8. Lake Street Community Center
  9. Lake Street Park
  10. Lake Street Skate Park
  11. MacArthur Park
  12. MacArthur Park Recreation Center
  13. MacArthur Park Lake
  14. Burns (Robert L.) Park
  15. La Mirada Park
  16. Silverlake Recreation Center
  17. Seoul International Park
  18. Unidad Park
  19. Barnsdall Art Park
  20. Barnsdall Art Park Museum
  21. Echo Park Cafe Concession
  22. Echo Park Lake
  23. Echo Park Pedal Boats Concession
  24. Silverlake Dog Park
  25. Seily Rodriguez Park
  26. Echo Park Recreation Center
  27. Hope and Peace Park
  28. Sunnynook River Park (off-map)
  29. Patton Street Park
  30. Echo Deep Indoor Pool
- (#) Libraries
  1. Felipe de Neve Branch Library
  2. Cahuenga Branch Library
  3. Wilshire Branch Library
  4. Edendale Branch Library

Source: Yahoo Maps, 2019.

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Figure 6.4
Public Services in the Project Site Vicinity

hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. According to the LAFD, minimum fire flow requirement for the Proposed Project is 6,000 to 9,000 gallons per minute (gpm) from six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) would be prepared and approved for the Proposed Project by the Department of Water and Power (LADWP) to ensure that fire flow requirements are considered adequate for the Project Site. With approval from LADWP, development of the Proposed Project would result in a less than significant impact to fire flow requirements. 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 Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site. Operation of the Proposed Project would not result in the increased demand for additional LAFD facilities and, therefore, result in a less than significant impact to fire protection services.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. Section 15382 of the CEQA guidelines defines “significant effect on the environment” 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. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment. In other words, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety

services alone are not an environmental impact that CEQA requires a project applicant to mitigate.[85]

The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Rampart Division Police Station, located at 1401 W. 6th Street, approximately 2.3 miles southeast (driving distance) from the Project Site. The Rampart Community Police Station area is approximately 5.54 square miles and includes the communities of Angelino Heights, Echo Park, Historic Filipinotown, Korea Town, Lafayette Park, MacArthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake. The service boundaries for Central Area are as follows: Stadium Way, Pasadena Freeway (SR-110) to the north, Washington Boulevard, 7th Street to the south, Los Angeles River to the east, and the Harbor Freeway (I-110) to the west.

Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant is required to ensure the site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. The Applicant will also provide on-site security personnel to secure the site on a 24-hour a day basis during construction. As such, with adherence to regulations and project conditions, Proposed Project impacts would be less than significant during the construction period.

Operation

Development of the Proposed Project would result in an increase of residents, employees, visitors, and patrons to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site over the current conditions. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Applicant will provide an on-site security personnel to operate 24 hours a day, seven days a week.

[85] *City of Hayward et al. v. Board of Trustees of th88e California State University (2015).*

Upon completion of the Proposed Project, the Applicant would also provide the Rampart Area Commanding Officer with a diagram of each portion of the Proposed Project. The diagram should include access routes and any additional information that might facilitate police response. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of people at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents and employees would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD. With incorporation of the security design features identified in the LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", which will be confirmed through the Site Plan Review process, the Proposed Project's potential impact upon LAPD services would be reduced to a less than significant level.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2 and Board District 5. The Project Site is currently served by one elementary school, one middle school, and one high school. Table 6.23, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table 6.23
Resident Schools Serving the Project Site

School Name	Grades	Address
Dr. Sammy Lee Elementary Medical Health Science Magnet	K-5	3600 Council Street
Thomas Starr King Middle School Magnet: Film and Media	6-8	4201 Fountain Avenue
John Marshall Senior High School	9-12	3939 Tracey Street

Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed August 2019.
Parker Environmental Consultants, 2019

As shown in Table 6.24, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 103 elementary students, 28 middle school students and 59 high school students, for a total of approximately 190 students. Based on correspondence from the LAUSD, no new school construction is planned within the

project's service area. Both the Dr. Sammy Lee Elementary Medical Health Science Magnet School and the Thomas Starr King Middle School Magnet: Film and Media School are currently operating near or above capacity and are projected to have overcrowding conditions in the near future. As such, the Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of all applicable School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

Table 6.24
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Existing Uses (to be removed)					
Single-family	3 du	1	0	0	1
Total Existing Students:		**1**	**0**	**0**	**1**
Proposed Project					
Multi-Family [a]	454 du	104	28	59	191
Total Estimated Students:		**104**	**28**	**59**	**191**
Less Existing:		*1*	*0*	*0*	*1*
Net Student Generation:		**103**	**28**	**59**	**190**

Notes: sf = square feet; du = dwelling units; emp = employees

[a] *Student generation rates are as follows for multi-family and single-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range

standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Project Site is located within a highly urbanized area of the Wilshire community and, as shown in Table 6.25, Recreation and Park Facilities within the Project Area, has access to approximately 123 acres of parkland and public recreation facilities within a two-mile radius. As summarized in Table 6.25 below, these facilities range in size from a 0.29-acre pocket park to the 31-acre MacArthur Park. The Proposed Project would provide approximately 36,580 square feet (0.84-acres) of total common open space and amenities on-site available exclusively to serve Project residents and guests. The Proposed Project includes a variety of on-site amenities including, but not limited to, a second level amenity deck and terraces, thereby achieving the required square feet of open space required by the LAMC. Given the Project Site's proximity to an abundance of parks and recreational facilities and its provision of on-site open space, the Proposed Project's increased demands upon public parkland and recreation facilities would be reduced to less than significant levels.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the Proposed Project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the

demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Table 6.25
Recreation and Park Facilities within the Project Area

Park Name	Size (acres)	Park Amenities	Approx. Distance from Project Site (miles)
1. Madison West Park	0.5	Open space (lawns), and children's play area	0.21
2. Bellevue Recreation Center	9.33	Auditorium, barbecue pits, baseball diamond, basketball courts, children's play area, indoor gym, picnic tables, jogging path, kitchen, multipurpose sports field, and stage	0.63
3. Shatto Recreation Center	5.43	Auditorium, baseball diamond, basketball courts, children's play area, community room, tennis courts, jogging path, kitchen, multipurpose sports field, outdoor fitness equipment, and stage	0.68
4. Occidental Parkway	3.14	Open space	0.74
5. Lemon Grove Recreation Center	5.15	Auditorium, barbecue pits, baseball diamond, basketball courts, children's play area, picnic tables, batting cages, jogging path, kitchen, outdoor fitness equipment, stage, and TV area	1.03
6. Lafayette Multipurpose Community Center	8.46	Auditorium, basketball courts, children's play area, community room, picnic tables, soccer field, tennis courts, jogging path, kitchen, and synthetic field	1.10
7. Lafayette Skate Park	0.77	Skate park	1.10
8. Lake Street Community Center	2.05	Basketball courts, children's play area, community room, indoor gym, small grass area, and skate park	1.25
9. Lake Street Park	1.02	Basketball courts, children's play area, community room, indoor gym, volleyball courts, skate plaza, and grass area	1.27
10. Lake Street Skate Park	0.81	Children's skateboarding classes	1.27
11. MacArthur Park	19.6	Baseball diamond, children's play area, picnic tables, lake	1.35
12. MacArthur Park Recreation Center	3.6	Children's play area, picnic tables, bandshell, kitchen, outdoor fitness equipment, synthetic field, multipurpose room	1.35
13. MacArthur Park Lake	7.8	Barbecue pits, children's play area, pedal boats, picnic tables, synthetic field, walking paths, fishing	1.48
14. Burns (Robert L.) Park	1.65	Children's play area, picnic tables	1.49
15. La Mirada Park	0.16	Outdoor fitness equipment, picnic tables	1.54
16. Silverlake Recreation Center	3.95	Children's play area, community room, indoor gym, picnic tables, multipurpose sports field	1.69
17. Seoul International Park	3.38	Auditorium, baseball diamond, children's play area, picnic tables, basketball courts, community room, outdoor fitness equipment, waking path, outdoor fitness area	1.70
18. Unidad Park	0.29	Open space (lawns), and children's play area	1.72
19. Barnsdall Art Park	10.52	Open space	1.72
20. Barnsdall Art Park Museum	1.28	Exhibitions, performances, school outreach, special events, tours, visual and performing arts programs	1.72
21. Echo Park Café Concession	0.16	Concession stand	1.74

22. Echo Park Lake	24.53	Fishing, pedal boats, picnic tables, and walking paths	1.74
23. Echo Park Pedal Boats Concession	0.11	Pedal boat rentals	1.74
24. Silverlake Dog Park	1.26	Open space, picnic tables, dog park	1.76
25. Seily Rodriguez Park	0.28	Basketball courts, children's play area, picnic tables, benches	1.77
26. Echo Park Recreation Center	1.61	Barbecue pits, baseball diamond, basketball courts, children's play area, community room, soccer field, tennis courts, stage, picnic tables, indoor gym, season pool	1.79
27. Hope and Peace Park	0.53	Basketball courts, benches, open space	1.79
28. Sunnynook River Park	3.76	Walking path, benches, picnic tables	1.83
29. Patton Street Park	0.4	Children's play area, outdoor fitness equipment, walking path, benches	1.87
30. Echo Deep Indoor Pool	1.92	Year-round pool, and open space	1.96
Total Parkland (Approximate):	**123.45**		

Sources: Park distances, size, and amenities were determined using:
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/; and
(2) Navigate LA, http://navigatela.lacity.org/navigatela/, accessed May 2019.
Parker Environmental Consultants, 2019.

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branch currently serving the Project Site include:

- Felipe de Neve Branch Library, located at 2820 W. 6th Street, approximately 1 mile south of the Project Site;
- Cahuenga Branch Library, located at 4591 Santa Monica Boulevard, approximately 1.2 miles north of the Project Site;
- Wilshire Branch Library, located at 149 N. Saint Andrews Place, approximately 1.4 miles west of the Project Site.
- Edendale Branch Library, located at 2011 W. Sunset Boulevard, approximately 1.8 mile east of the Project Site.[86]

LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square foot facilities for communities with less than a population of 45,000 and 14,500 square foot facilities for communities with a population of more than 45,000. At 500,000 square feet the Central Library, which serves the entire City, far

[86] *City of Los Angeles Public Library, Hours and Locations, website: http://www.lapl.org/branches, accessed August 2019.*

exceeds these criteria and currently meets the library demands of the surrounding community.

Construction

Construction workers of the Proposed Project would not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. Therefore, potential impacts to library service and facilities would be less than significant during construction of the Proposed Project.

Operation

The Proposed Project would generate approximately 564 residents. The additional residents represent a negligible amount of the current service population of the Felipe de Neve Branch Library, Cahuenga Branch Library, Wilshire Branch Library, and Edendale Branch Library, and would be accommodated in the future service population of the Central Library, which serves the entire City. Furthermore, the LAPL does not have any current or proposed plans to construct additional libraries within the Project's service area. Therefore, potential impacts to library service and facilities by residents would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City,

the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant**.**

Police

With respect to police services, the Proposed Project, in combination with the related projects, would increase the demand for police protection services in the project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Schools

With respect to cumulative impacts upon schools, the Proposed Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. However, each of the new housing units would be responsible for paying mandatory school fees as applicable to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Proposed Project in conjunction with related projects could result in an increase in permanent residents residing in the surrounding area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with the LAMC which may include payment of Parks and Recreation Fees for market rate residential projects. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[87] Moreover, the Central Library far exceeds the LAPL criteria for its service area. Thus, the additional population generated by the Proposed Project and the related projects would not make a cumulatively considerable impact upon the City's library system.

[87] *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

6.16 Recreation

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

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

Less Than Significant Impact. For the purpose of this SCEA, a significant impact may occur if the project would include substantial employment or population growth, which would 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.

The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Proposed Project would generate approximately 564 residents and would provide a minimum of 36,580 square feet of open space areas, including a 28,644 square foot ground-floor outdoor courtyard and ground-floor community rooms located in each of the five residential buildings. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services.

Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table 6.25, above, there are 30 existing, new, and recently improved parks within an approximate 2-mile radius of the Project Site totaling approximately 123 acres that are available to serve the future residents, guests, and visitors to the Project Site. In addition, the Proposed Project would provide approximately 36,580 square feet (0.84 acres) of open space and recreational facilities on-site that would be available exclusively to serve Project residents and their guests. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially 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. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 30 existing, new, or recently improved parks within an approximate 2-mile radius of the Project Site totaling approximately 123 acres that are available to serve the future residents, guests, and visitors to the Project Site. The Proposed Project would also provide approximately 36,580 square feet of open space and recreational facilities on-site. Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the Wilshire area to accommodate cumulative

demands created by increased residential development. The related projects that include market-rate residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

6.17 Transportation/Traffic

	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?	☐	☐	☒	☐

The City of Los Angeles has updated its travel demand model, impact evaluation methodology and transportation impact thresholds based on vehicle miles traveled (VMT). The City adopted the new CEQA thresholds and methodology for VMT, along with revised Transportation Assessment Guidelines (TAG) in July 2019. However, because this Project has a signed MOU and submitted its Affordable Housing Referral[88] application to the Department of City Planning (DCP) prior to the City's adoption date, and because the Transportation Study has already been in substantial progress, the Transportation Study utilizes the (previous) guidelines that were in effect when the study commenced. Accordingly, the following section summarizes the information provided in the Transportation Study, prepared by The Mobility Group, dated January 2020 for

[88] *Application submitted July 3, 2019 and its review fee was paid on July 11, 2019.*

addressing threshold questions a, c, and d. The Transportation Study is provided in its entirety in Appendix I to this SCEA. With respect to Threshold Question b, this SCEA relies on the findings of the supplemental Enlightenment Plaza Project – VMT Analysis, dated February 5, 2020 contained in Appendix I.2. The City of Los Angeles Department of Transportation (LADOT) correspondence of approval (dated May 3, 2020, Re: DOT Case #CEN19-48497) is also provided in Appendix I to this SCEA.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. The following analysis of applicable programs, plans, or policies is based on the Transportation Study provided in Appendix I-1.

Driveway and Site Circulation

The main vehicular access (ingress and egress) is to be provided from Madison Avenue. A centralized drop-off and pickup will also be provided on Madison Avenue. Vehicular access will also be provided via driveways on Oakwood Avenue and Juanita Avenue to parking for those components of the Project. Project traffic will therefore use Madison Avenue, Juanita Avenue and Oakwood Avenue to access the Project.

All Project driveways will be designed according to LADOT standards, so there will be no significant impacts due to roadway design hazards.

It is anticipated that the vacated portions of Madison Avenue and Oakwood Avenue would not be available for general public use, and would be controlled by a control arm type device. Project residents and employees would pass through the vacated street section with use of key card or similar device to operate the control barrier. A similar option would be provided for the adjacent PATH project on the east side of Madison Avenue to Oakwood Avenue. The public would not however be able to use the vacated sections of Madison Avenue and Oakwood Avenue.

Access and circulation for the Proposed Project would there remain unchanged with the potential street vacations. Other than traffic from the Proposed Project and from the adjacent PATH project, traffic volumes currently using this segment of Madison Avenue are negligible, and as Juanita Avenue and Oakwood Avenue offer alternate access routes to Beverly Boulevard and Virgil Avenue, the street vacation is not expected to cause significant traffic impacts. Thus, no significant impacts due to roadway design hazards would occur under the proposed roadway vacations.

Congestion Management Program (CMP)

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

Transit Impacts

The Project Site is well served by transit. The Metro Red Line subway rail station at Vermont Avenue and Beverly Boulevard is located one block from the Project site. It also located within walking distance of six bus routes – Metro 14, Metro 201, Metro 204, one Metro Rapid Route – Metro 754, as well as one LADOT Commuter Express line – CE422, and one LADOT DASH bus line – Wilshire Center/Koreatown. Additionally, there are 11 bus stops within three blocks of the Project Site. The following includes a summary of the transit lines service the project rea:

- Metro Red Line (Metro Rail) runs between Downtown Los Angeles and North Hollywood via Vermont Avenue in the vicinity of the Project. It operates between approximately 4:20 a.m. and 1:20 p.m. on weekdays and weekends. It runs at about 10 minute headways during weekday peak periods and around 15-20 minute headways on weekends.

- Metro 754 (Metro Bus Rapid Transit) runs between Athens and Hollywood via Vermont Avenue. It operates between approximately 5:10am and 9:25pm on weekdays and between 6:40 a.m. and 9 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 15-20 minute headways on weekends.

- Metro 14 runs between Beverly Hills and Downtown Los Angeles via Beverly. It operates between approximately 5:10 a.m. and 12:50 a.m. on weekdays and between 5:30 a.m. and 12:50 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 20 minute headways on weekends. It also operates Owl Schedule, between 1:50 a.m. and 4:50 p.m. Monday thru Sunday.

- Metro 201 runs between Glendale and Koreatown Athens and Hollywood via Vermont Avenue in the vicinity of the Project. It operates between approximately

5:45 a.m. and 8:40 p.m. on weekdays and between 7 a.m. and 9 p.m. on weekends. It runs at about 55 minute headways during weekday peak periods and around 60 minute headways on weekends.

- Metro 204 runs between Athens and Hollywood via Vermont Avenue. It operates between approximately 4:50 a.m. and 5 p.m. weekdays and between 5:40 a.m. and 5 p.m. on weekends. It runs at about 10 minute headways during weekday peak periods and around 20 minute headways on weekends.

- LADOT Commuter Express 422 runs between Hawthorne and Downtown Los Angeles via Highway 101 in the vicinity of the Project. It operates between approximately 5:25 a.m. and 8:30 a.m. and between 3:35 p.m. and 7:40 p.m. on weekends only. It runs at about 20 minute headways during weekday peak periods.

- LADOT DASH Wilshire Center/Koreatown has a bus stop located on Vermont Avenue at the 1st Street intersection. It operates between approximately 7:30am and 7:10Pm on weekdays and between 9:30 a.m. and 6:30 p.m. on weekends. It runs at about 20 minute headways during weekdays and weekends.

Additionally, it should be noted that the Proposed Project incorporates a turn-about driveway and drop off zone on Madison Avenue that is designed to accommodate paratransit vehicles to service the project's residents. The turn-about is designed to accommodate full size city busses should any transit stops be proposed for this location.

CMP Transit Impacts

Transit adjustments were applied to the proposed and existing commercial uses only, since the trip generation rates applied to the residential use already account for transit availability and usage. The net vehicle trips via transit/walk adjustments were developed for the proposed and existing commercial uses, but they must still be determined for the proposed residential use. Given that the capacity of one standard bus is 40 riders, and there are nine bus lines with a reasonable walking distance of the Project site, with several more bus lines and rail facilities slightly outside the reasonable walking distance (but within approximately one-half mile), the Proposed Project is anticipated to have a minimal impact on the surrounding transit network. Therefore, it is expected that the incremental additions of Project person transit trips would not have a significant impact on transit service in the study area.

Bicycle Facilities

The Mobility Plan 2035 designates a network of bicycle lanes (Tier 1, Tier 2 and Tier 3) and bicycle paths in the area of project. Tier 1 Bicycle Lanes are bicycle facilities on

arterial roadways with physical separation. Tier 2 and Tier 3 Bicycle Lanes are bicycle facilities on arterial roadways with striped separation. Bicycle Paths are facilities outside of the roadway. Bicycle Routes are identified routes for bikes and are streets signed to alert drivers to bicyclists sharing the roadway spaces – often with the use of "sharrow" symbols painted on the street.

Existing bicycle facilities in the project area comprise a Bicycle Lane or Bicycle Route on the following streets:

- New Hampshire Avenue south of Rosewood Avenue - Bicycle Route
- Rosewood Avenue between New Hampshire Avenue and Serrano Avenue – Bicycle Route
- 1st Street between Vermont Avenue and Beverly Boulevard - Bicycle Lane on both sides
- Hoover Street south of Council Street and north of Temple Street - Bicycle Route
- Temple Street between Hoover Street and Robinson Street - Bicycle Route
- Robinson Street between Temple Street and Council Street - Bicycle Route
- Council Street between Hoover Street and Robinson Street - Bicycle Route
- Clinton Street between Heliotrope Drive and Hoover Street - Bicycle Route
- Bellevue Avenue east of Hoover Street - Bicycle Route
- Heliotrope Drive between Melrose Avenue and Rosewood Avenue - Bicycle Lane

The Mobility Plan 2035 identifies designated bicycle facilities planned for implementation over the longer term. The Mobility Plan 2035 designates approximately 1,200 miles of street in the City's Bicycle Network that includes a Bicycle Enhanced Network and a Bicycle Lane Network. The Bicycle Enhanced Network consists of Bicycle Paths, Tier 1 Bicycle Lane (Protected Bicycle Lane) and Neighborhood Enhanced Network. The Bicycle Lane Network consists of Tier 2 and Tier 3 Bicycle Lanes.

In the area of the Project, the Mobility Plan 2035 recommends Tier 2 bike lanes along Beverly Boulevard east of Westmoreland Avenue, on Silverlake Boulevard east of Virgil Street, on 1st Street between Virgil Street and Beverly Boulevard; Tier 3 bike lanes along Beverly Boulevard west of Westmoreland Avenue, on Temple Street east of Westmoreland Avenue, and along Virgil Avenue. These are in addition to, or change to the existing bicycle facilities.

For the remaining facilities, the Mobility Plan 2035 will implement the overall list of improvements in phases over many years, and in many cases the proposals are conceptual and the plan does not identify the specific street configurations or geometries that will be necessary to accommodate the proposed bike lanes on those streets – which are details to be worked out in the future.

At the time of preparing this report, none of the designated planned facilities in the area as identified above are programmed for completion before the Project design year of 2023 so there are no definitive details on roadway layouts to accommodate the improvements, and they are not included in the following analysis. These facilities will be evaluated by LADOT over time as the Mobility Plan 2035 is implemented in future phases. The Proposed Project would not prevent or hinder these improvements from being constructed in the future. Therefore, the Proposed Project would not conflict with any existing or planned bicycle facilities and impacts would be less than significant.

Pedestrian Facilities

The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. Adjacent to the Project site there is a fifteen-foot sidewalk on Juanita Avenue west of the Project site, a twelve-foot sidewalk on Oakwood Avenue north of the Project Site, and an eight-foot sidewalk on Madison Avenue east of the Project Site. Beverly Boulevard, south of the Project Site, is currently improved with a thirteen-foot sidewalk.

According to Walkscore.com[89], the area of the Project has a walkability score of 96 (out of 100) – which is described as a "Walker's Paradise" where 'most errands can be accomplished on foot'. (Walkscore also allocates a transit score of 100 - 'riders paradise, world class public transportation', and a bike score of 63 – bikeable, flat as pancake, minimal bike lanes') to the area of the Project.

The Mobility Plan 2035 defines Pedestrian Enhanced Districts to identify "where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to/from manor destinations within communities." The Mobility Plan 2035 aims to promote walking and reduce reliance on other modes for shorter trips by providing more attractive and wider sidewalks, and adding pedestrian signalization, street trees, and other design features that encourage people to take trips on foot instead of by car.

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[89] *Walk Score is a large-scale, public access walkability index that assigns a numerical walkability score to any address in the United States, Canada, and Australia. Walk Score is based on analysis of walking routes to nearby amenities, as well as measuring pedestrian friendliness by analyzing population density and road metrics such as block length and intersection density.*

The Mobility Plan 2035, in identifying Pedestrian Enhanced Districts, has designated the following arterial streets in the area of the Project as Pedestrian Street Segments: Beverly Boulevard, Virgil Avenue, Hoover Street, Temple Street, Silver Lake Boulevard, and 3rd Street.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian-friendly street edges along Juanita and Madison Avenues. Along Madison Avenue, a new on-site passenger loading zone with turn-around will be centrally located between Enlightenment Plaza & PATH Metro Villas on the east side of the street. The sidewalk on Madison Avenue adjacent to the Project, will be widened to up to 12 feet wide in most locations. On Juanita Avenue existing 12 foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood & Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita & Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Project becoming more pedestrian oriented.

These improvements, along with the vacation of part of Madison Avenue and portions of Oakwood and Juanita Avenues will also help secure the Project Site seamlessly engage the campuses of PATH Metro Villas and Enlightenment Plaza. Thus, the Proposed Project would not conflict with any applicable policies related to pedestrian circulation and impacts would be less than significant.

Vision Zero

The City of Los Angeles Department of Transportation is implementing a program called Vision Zero Los Angeles[90], which represents a citywide effort to eliminate traffic deaths in the City of Los Angeles by 2025. Vision Zero has two goals: a 20% reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions, and where LADOT has determined that pedestrian enhancement improvements will be most effective in meeting these goals. The HIN is comprised of 386 corridors that represent 6% of Los Angeles' street miles, and 65% of all deaths and severe injuries involving people walking and biking occur on these 6% of streets.

The Proposed Project is located near Beverly Boulevard, which is on the High Injury Network (HIN). Other streets in the vicinity of the Project Site that are located on the High

[90] *Vision Zero Los Angeles 2015-2025 – Action Plan, January 2017.*

Injury Network are Vermont Avenue, Temple Street – east of Robinson Street, and Virgil Avenue – north of Middlebury Street.

The Proposed Project introduces various streetscape improvements to encourage more pedestrian friendly street edges along Juanita and Madison Avenues. Along Madison Avenue, a new onsite passenger loading zone with turn-around will be centrally located between Enlightenment Plaza & PATH Metro Villas on the east side of the street. The sidewalk on Madison Avenue adjacent to the Project, will be widened to up to 12ft wide in most locations. On Juanita Avenue existing 12-foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood & Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Twelve new bike racks will be strategically located along both Juanita & Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Project becoming more pedestrian oriented. These improvements, along with the vacation of part of Madison Avenue and portions of Juanita Avenue and Oakwood Avenue will also help seamlessly engage the campuses of PATH Metro Villas and Enlightenment Plaza. As such, the Proposed Project would not conflict with Vision Zero policies and impacts upon pedestrian safety would be less than significant.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing Major Transit Stop or a stop along an existing High Quality Transit Corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On July 30, 2019, the City of Los Angeles adopted LADOT's CEQA Transportation Assessment Guidelines (TAG), which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts in conformance with SB 743. The adopted TAG establishes VMT as the City's formal method of evaluating a project's transportation impacts. As part of the preparation of this version of the City's TAG, the City updated its travel demand simulation model and transportation impact thresholds to be consistent with the VMT impact methodology. As discussed above, for purposes of addressing the projects consistency with CEQA Guidelines Section 15064.3, the following analysis is based on the findings

and conclusions of the supplemental Enlightenment Plaza Project – VMT Analysis, dated October 2019 contained in Appendix I.2 to this SCEA.

VMT Screening

The preparation of a transportation assessment, which includes a VMT analysis, is required for any project that would generate a net increase of 250 or more daily vehicle trips and requires discretionary action. Table 6.26, below, shows the VMT trip generation screening comparison of the existing daily trips and proposed daily trips to determine if a VMT analysis is required. Because the 374 net trips generated by the Proposed Project exceed the threshold of 250 trips, a VMT analysis was conducted to determine the VMT impacts for the Proposed Project.

Table 6.26
VMT Trip Generation – Project Screening Comparison

	Land Use	Scale	Daily Trips
Proposed	Permanent Supportive Housing	449 DU	
	Apartments	5 DU	
	Subtotal		544
Existing	AT&T Yard	7,862 sf	
	Subtotal		170
	Net Difference [Proposed – Existing]		**374**
	Analysis Required [Net Difference > 250]		Yes

Notes:
DU = Dwelling Units
sf = square feet
Source: The Mobility Group, Enlightenment Plaza Project VMT Analysis, February 5, 2020.

VMT Thresholds

LADOT has identified thresholds for significant VMT impacts by sub-area of the City, by Area Planning Commission (APC) area. The State of California Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15% or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA. CEQA allows lead agencies to set or apply their own significance thresholds. LADOT set its significance thresholds as follows: a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15% below the existing average work VMT

per employee for the APC area in which it's located. (LADOT Guidelines, page 17.) The Project is located in the Central APC. For this area of the City the following specific thresholds have been identified:

Household VMT Per Capita:	6.0
VMT Per Employee:	7.6

VMT Analysis

As shown in Table 6.27, below, with the Proposed Project, the Household VMT per Capita would be 5.4 compared to the threshold of 6.0, and the Work VMT per Capita would be 0 compared to the threshold of 7.6. Therefore, it is concluded that the Project would not cause significant VMT impacts for either Household VMT and/or Work VMT. As such, no mitigation is warranted. The LADOT VMT calculation worksheets are provided in Appendix I-2 to this SCEA.

Table 6.27
Summary of VMT Analysis

Category	*Household*			*Work*		
Scenario	*Household VMT Threshold*	*Household VMT Per Capita*	*Impact*	*Work VMT Threshold*	*Work VMT per Employee*	*Impact*
Proposed Project	6.0	5.4	No	7.6	0.0	No
Source: The Mobility Group, Enlightenment Plaza Project VMT Analysis, February 5, 2020.						

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include any unusual or hazardous design features.

Current vehicular access is provided by driveways located along Juanita Avenue and Madison Avenue, that provide access to the surface parking lot and manufacturing uses on the Project Site. As shown in Figure 3.7, Plot Plan, the main vehicular access (ingress and egress) is to be provided from Madison Avenue. A centralized drop-off and pickup will also be provided on Madison Avenue. Vehicular access will also be provided from Oakwood Avenue and Juanita Avenue. All Project driveways will be designed according

to LADOT standards, so there will be no significant impacts due to roadway design hazards.

It is anticipated that the vacated portions of Madison Avenue and Oakwood Avenue would not be available for general public use, and would be controlled by a control arm type device. Project residents and employees would pass through the vacated street section with use of key card or similar device to operate the control barrier. A similar option would be provided for the adjacent PATH project on the east side of Madison Avenue to Oakwood Avenue. The public would not however be able to use the vacated sections of Madison Avenue, Juanita Avenue and Oakwood Avenue. Access and circulation for the Proposed Project would there remain unchanged with the potential street vacations. Thus, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section 6.9(f), the Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.[91] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[92]

Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. As required for all development projects that have the potential to result in partial street or sidewalk closures, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LADOT to ensure that

[91] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

[92] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Accordingly, any temporary construction traffic impacts would be less than significant.

6.18 Tribal Cultural Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or

object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Responses to a and b: Less Than Significant Impact. For purposes of this analysis, Dudek was retained to prepare a Tribal Cultural Resources Report to assess the potential for significance of the Project to impact resources associated with California Native American tribes. The following section is based on the following technical report:

- Dudek, Draft Tribal Cultural Resources Report for the 316 N. Juanita Avenue Project, City of Los Angeles, Los Angeles County,April 2020.

For the purposes of the Tribal Cultural Resources Report, the entire block in which the Proposed Project Site is situated is considered the Study Area. The Study Area is on a relatively flat lot and is currently developed with nine buildings. The Study Area is situated within a residential and commercial zone in the northeastern corner of the Wilshire Community Plan Area and the northwest corner of the Rampart Village of the City of Los Angeles. Surrounding uses in the immediate vicinity of the Study Area include commercial uses to the east, west, and south and residential uses to the north. The Study Area is also located immediately south of the US-101 Freeway. The entirety of the Study Area is developed with exposed ground surface and a few trees identified within APNs 5501-001-016 and 5501-001-019. Additionally, the Proposed Project Site includes a tree well situated in the west portion of the parking lot within APN 5501-001-800.

The Study Area is situated in the valley representing Downtown Los Angeles, approximately 12.4 miles northeast of the Pacific Ocean. Existing development is underlain by older alluvial sediments and marine sediments. Soils are dominated by the urban land-Montebello complex, associated with low-slope conditions and soils derived from older alluvium and human transported soils. Urban land soils make up the majority (70%) of Urban land-Montebello complex and are characterized by areas that have been developed with structures, parking lots, buildings, etc. and are underlain by disturbed natural soils. Any cultural deposits that are or may have been present within the Proposed Project Site would likely have been located on or near the surface, within the younger quaternary alluvium that makes up the surficial deposits within the entire Study Area. However, given that the entire surface of the Proposed Project Site has been disturbed for the extant developments, cultural resources located on or near the surface may have

been adversely impacted or destroyed, though it is possible that the asphalt covering the Proposed Project Site has capped deeper cultural deposits.

Dudek completed a CHRIS records search conducted at the SCCIC on April 8, 2019 of the Study Area and a 0.5-mile (804 foot) record search area. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Study Area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The SCCIC records indicate that 22 cultural resources investigations have been conducted within a half-mile of the Study Area. Of these, two studies have been conducted within a portion of the Study Area. Both of these reports are cultural resource studies prepared by LSA Associates, Inc. in support of a proposed wireless service facilities to be developed by AT&T Fixed Wireless Services. Neither study identified archaeological resources within a half-mile of the Study Area and neither project required ground disturbance. Therefore, it was determined that there would be no potential to impact any unrecorded archaeological resources.

SCCIC records indicate that a total of 16 previously recorded cultural resources fall within the records search area, none of which are within the Study Area. All 16 resources are historic-era buildings or structures. No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within a half-mile of the Study Area.

Native American Correspondence

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on April 4, 2019. The NAHC emailed a response on April 25, 2019, which indicated that the SLF search was completed with negative results. Documents related to the NAHC SLF search are included in Appendix J to this SCEA.

Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known tribal cultural resources no mitigation measures are required. Nonetheless, adherence to the regulatory compliance measures referenced above in Section 5, Cultural Resources, would ensure impacts associated with the accidental

discovery of any archaeological resources or human remains, including Native American resources would be less than significant. As noted above, in Section 5, if an unexpected discovery of archaeological resources should occur, compliance with the following regulatory compliance measure would be required:

- Cultural Resources (Archaeological Resources): In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Compliance with the above-listed regulatory compliance measures substantially conforms to SCAG RTP/SCS Program EIR MM-CUL-2(b)CUL and would reduce any potentially significant impacts to less than significant levels.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to tribal cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate -regulatory compliance measures. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.

6.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

PROJECT-SPECIFIC IMPACTS

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 increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The determination of whether a project results in a significant impact on water shall be made considering the

following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The LADWP ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[93] In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd.[94]

As shown in Table 6.28, the Proposed Project would generate a net increase in water demand of approximately 37,053 gallons per day (gpd) of water (or approximately 41.5 acre-feet per year), which is significantly below available capacity. Because the Proposed Project's residential growth is within SCAG's forecast, the Proposed Project's increased water demand would not measurably reduce the LAAFP's capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less than significant impact.

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of

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93 *U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization—-oxygen-plant-replacement, accessed May 2019.*

94 *Los Angeles Department of Water and Power, Water, L.A.'s Drinking Water Quality Report, website: http://www.ladwp.com/, accessed May 2019.*

Table 6.28
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Uses (to be removed)			
Commercial	7,881 sf	0.05 gpd/sf	394
Single-family residential	3 du	140 gpd/du	420
		Total Existing Water Demand:	**814**
Proposed Project			
Residential Units (454 total)			
Studio	370 du	75 gpd/du	27,750
One Bedroom	71 du	110 gpd/du	7,810
Two Bedroom	13 du	150 gpd/du	1,950
Open Space			
Landscaped Area	7,627 sf [b]	(see Appendix C)	357
		Total Project Site Water Demand:	**37,867**
		Less Existing Water Demand:	*(814)*
		Net Water Demand:	**37,053**

Notes: sf =square feet; du = dwelling units

[a] *Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012. It is assumed that all water usage would convert to wastewater.*

[b] *Based on 7,627 square feet of landscaped area per the Landscape Concept Plan Sheet L001 dated November 2019.*

Source: Parker Environmental Consultants, February 2020.

a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project Site. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. 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 a peak wet weather flow of 800 mgd.[95] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 6.29 below, the Proposed Project would generate a net increase of approximately 37,645 gpd of wastewater, representing a fraction of one percent of the available treatment capacity at HTP.

With respect to local infrastructure, the Project Site is presently served by a network of sewer lines that are located beneath major streets that convey sewage from the Project Site to the HWRP. Based on correspondence with BOS dated August 26, 2019 (see Appendix G to this SCEA), the sewer infrastructure in the vicinity of the Proposed Project includes an existing 8-inch line of Juanita Avenue. The sewage from the existing 8-inch line feeds into a 20-inch line on Berendo Street before discharging into a 48-inch sewer line on Normandie Avenue. Based on the estimated flows, the existing sewer system has adequate capacity to accommodate the total wastewater flows generated by the Proposed Project.

Table 6.29
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Uses (to be removed)			
Commercial	7,881 sf	0.096 gpd/sf	757
Single-family residential	3 du	140 gpd/du	420
		Total Existing Wastewater Generation:	**1,177**
Proposed Project			
Residential Units (454 total)			
Studio	370 du	75 gpd/du	27,750
One Bedroom	71 du	110 gpd/du	7,810
Two Bedroom	13 du	150 gpd/du	1,950
Supportive Services [b]	11,772 sf	50 gpd/1,000 sf	982
Common Areas [c]	14,600 sf	50 gpd/machine	330
		Total Project Site Water Demand:	**38,822**
		Less Existing Water Demand:	*(1,177)*
		Net Water Demand:	**37,645 gpd**

Notes: sf =square feet; du = dwelling units
[a] *Wastewater generation rates are based on the City of Los Angeles Department of Public Works, Bureau of Sanitation, Enlightenment Plaza Project – Request for Wastewater Service Information, August 26, 2019 (See Appendix G to this SCEA).*
[b] *Supportive Services include but are not limited to community rooms, case management offices, computer rooms and/or kitchen areas.*
[c] *Common areas include but are not limited to lobbies, mailrooms, laundry rooms, and/or other common decks and interior rooms.*
Source: Parker Environmental Consultants, 2020.

[95] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed May 2019.*

A final evaluation of sewer flows would need to be verified as part of the permit process and to identify a specific sewer connection point for the Project Site. This process ensures that the system can accept the anticipated wastewater flows from the Proposed Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. However, based on the configuration of sewer lines serving the Proposed Project, and the BOS correspondence dated August 26, 2019, it is anticipated that the Proposed Project's sewer flows would be routed to connect to the existing lines under Juanita Avenue and Madison Avenue. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

Stormwater Drainage Facilities

As described in Section 6.10, Hydrology and Water Quality, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with three commercial buildings, three single-family residential buildings, and one surface parking lot. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in Section 6.10, the Proposed Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Proposed Project impacts on stormwater drainage infrastructure would be considered less than significant.

Electricity and Natural Gas

As discussed in response to Question VI(a), energy, electricity and natural gas are provided by the LADWP and Southern California Gas, respectively. Adequate electricity and natural gas service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of electricity and natural gas is dependent upon adequate generating capacity, adequate fuel supplies, and a reliable distribution system. The estimated power requirement for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. Construction and operation of the Proposed Project would not necessitate the construction of off-site facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. As such, project impacts would be less than significant.

Telecommunications

Adequate telecommunications services exist within in the immediate the Proposed Project's vicinity and would be provided to the Project Site based on demand. Construction and operation of the Proposed Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. As such, Proposed Project impacts to telecommunication facilities would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project (SWP), and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data

from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 Acre-feet per year (AFY) in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 6.28, the Proposed Project's net increase for water demand would be 37,053 gallons per day. The Proposed Project's population, housing, and employment growths are within SCAG's forecast. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green) and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section 6.14, Population and Housing, the Proposed Project's population and employment growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. Similar to the Proposed Project, each related project would be evaluated to determine whether the water demand was accounted for in the UWMP or would otherwise be required to obtain approval from the LADWP certifying that the LADWP has sufficient water supplies available to serve the project. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan, and impacts associated with increased water demand would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. A significant impact would also occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and

discharge requirements. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. As discussed above, the Hyperion Water Reclamation Plant has sufficient capacity for the Proposed Project. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity.

Local Wastewater Generation

Similar to the Proposed Project, each related project would be required to obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significant reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be

made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[96] 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.[97]

In order to meet the above state requirements and local solid waste diversion goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

The Project Site is located within the North Central Commercial Waste Franchise Zone, which is serviced under contract to Athens Services. Under the existing contract, the service provider is required to deliver all solid waste resources collected to the certified facilities specified in Table 6.30, below. After processing at the designated diversion and recycling facility centers, the remaining landfill-bound waste from areas within the North

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[96] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

[97] *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

Central Commercial Waste Franchise Zone would utilize the Chiquita Canyon Landfill, Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, Victorville Sanitary Landfill, and the Savage Canyon Landfill. For purposes of providing a conservative analysis, it is assumed that all of the Proposed Project's solid waste would be disposed of at the Chiquita Canyon Landfill.

Table 6.30
North Central Zone Authorized Disposal Facilities

Facility Name	Facility Address	Primary or Secondary
Mid-Valley Sanitary Landfill	2390 N Alder Ave Rialto, CA 92377	Primary/Secondary
Chiquita Canyon Landfill	29201 Henry Mayo Dr. Castaic, CA 91384	Primary/Secondary
San Timoteo Sanitary Landfill	San Timoteo Canyon Rd. Redlands, CA 72373	Primary/Secondary
Victorville Sanitary Landfill	18600 Stoddard Wells Rd Victorville, CA 92307	Primary/Secondary
Savage Canyon Landfill	13919 E Penn St. Whittier, CA 90602	Primary/Secondary
Athens Industry MRF	14048 E Valley Blvd. City of Industry, CA 91746	Secondary (Transfer)
Athens Sun Valley MRF & Transfer Station	11121 Pendleton St. Sun Valley, CA 91353	Primary (Transfer)
Central LA Recycling & Transfer Station (CLARTS)	2201 E Washington Blvd. Los Angeles, CA 90034	Secondary (Transfer)

Source: City of Los Angeles Department of Public Works, Personal Services Contract between the City of Los Angeles and Arakelian Enterprises, Inc., DBA Athens Services, for Exclusive Franchise to Provide Collection, Transfer, Processing, and Disposal Services for Solid Resources to Commercial Establishments and Applicable Multifamily Establishments in the West Los Angeles, North Central, and Harbor Zones, September 2016.

The Chiquita Canyon Landfill has an annual limit intake of combined solid waste and beneficial use materials (e.g. green waste and compost) not to exceed 2,800,000 tons per year (tpy) through the year 2024, and 1,800,000 tpy beginning in 2025 through the year 2047.[98] Based on the current conditional use permit (CUP 2004-00042(5)), the overall average daily capacity of all incoming materials received for processing, disposal, and beneficial use at the facility shall not exceed 6,730 tons per day.[99] The maximum tonnage of any combination of solid waste and other materials received by the facility for processing, beneficial use materials (including composting) and disposal shall not exceed 12,000 tons on any given day, provided the monthly tonnage

[98] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2017 Annual Report, April, 2019 (at page 25).*

[99] *County of Los Angeles, Project No. R2004-00559-(5), Conditional Use Permit No. 2004-0042-(5) July 25, 2017.*

capacity shall not be exceeded.[100] In 2017, the Chiquita Canyon Landfill had an average disposal intake of 4,588 tons per day.[101]

Based on the calculations provided in Table 6.31, it is estimated that the proposed construction activities would generate approximately 5,934 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. Pursuant to Section 66.32 of the LAMC, the Proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

Table 6.31
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a]	Generated Waste (tons)
Demolition			
Commercial	7,881 sf	155 lbs/sf	611
Single-family Residential	1,519 sf	155 lbs/sf	118
Soil Export	3,040 cy	2,400 lbs/cy	3,648
Asphalt Export	845 cy	2,400 lbs/cy	1,014
Construction			
Residential and Support Services	247,812 sf	4.38 lbs/sf	543
		Total Debris:	**5,934**

Notes: sf= square feet
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
Source: Parker Environmental Consultants, 2019.

As shown in Table 6.32, below, Estimated Operational Solid Waste Generation, the Proposed Project's net generation during operation of the Proposed Project would be 5,381 pounds per day, as compared to the existing uses on the Project Site. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste

[100] *Ibid.*

[101] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2017 Annual Report, April, 2019 (at page 63).*

collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and the Proposed Project's impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. The amount of solid waste generated by the Proposed Project is within the available capacities of area landfills, and the Proposed Project's impacts to regional landfill capacity would be less than significant.

Table 6.32
Expected Operational Solid Waste Generation

Type of Use	Size [b]	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses (to be removed)			
Commercial (7,881 sf)	15 emp	10.53 lbs/employee/day	134
Single-family Residential	3 du	12.23 lbs/du/day	37
Total Existing Solid Waste Generation:			**171**
Proposed Project			
Multi-family Residential	454 du	12.23 lbs/du/day	5,552
Total Project Solid Waste Generation:			**5,552**
Less Existing:			*171*
NET TOTAL Solid Waste Generation:			**5,381**

Notes: sf = square feet, emp = employees
[a] *Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *The employee generation factor for commercial and residential uses was taken from the United States Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
Source: Parker Environmental Consultants, 2019.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of

recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Proposed 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 an on-site recycling area or room of specified size. The Proposed Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing

the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2017 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 126.4 million tons in the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons.[102] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with the Proposed Project is within those projections. In addition, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[103] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, back yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and

[102] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.*

[103] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

6.20 Wildfire

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

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

Responses a through d:

No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department (LAFD) 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. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Proposed Project, and no impact would occur.

6.21 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. A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or pre-history. As noted in the analysis above, the Project Site is developed with three commercial buildings, three single-family residential buildings, one office building, and one surface parking lot and does not support any substantial habitat of a fish or wildlife species. Vegetation on the Project Site is limited to trees on the Project Site, trees in the public right-of-way, and limited landscaping. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals of 4 non-protected trees, should construction commence during the breeding season.

Additionally, although no known direct impacts to historic resources are anticipated, compliance with existing regulations would ensure any impacts upon cultural resources are less than significant level in the unlikely event any such historic, or archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance, any impacts to paleontological resources would be less than significant. Therefore, with adherence to regulatory compliance measures, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the analysis above, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts to humans would be reduced to less than significant through the implementation of the applicable mitigation measures identified within this SCEA analysis.